



## Bonnell Aluminum Product Compliance Declaration

**Effective: September 15, 2023**

This document contains information on whether products manufactured by Bonnell Aluminum are compliant with certain global regulation requirements. This document covers all aluminum extruded products manufactured by Bonnell Aluminum except for products with thermal barriers, vinyl, Tredsafe inserts (see Futura Transitions by Bonnell Aluminum), accessories including but not limited to LED light kits, hardware, fasteners, and panel accessories (see TSLOTS by Bonnell Aluminum).

Bonnell Aluminum does not directly place its products on the European Union (EU) market and is therefore not subject to EU legislation. REACH<sup>i</sup>, CLP<sup>ii</sup>, RoHS<sup>iii</sup> and/or BPR<sup>iv</sup> only apply to products imported into the EU and place obligations on EU importers and/or non-EU manufacturers who export such products to the EU. Bonnell Aluminum's products are considered "articles" within the scope of REACH and CLP. RoHS applies to electric and electronic equipment (EEE). BPR applies to biocidal products and/or treated articles.

**The Customer should independently assess any requirements it might have under REACH, CLP, RoHS, and/or BPR when supplying products supplied by Bonnell Aluminum to the EU, including products containing Bonnell Aluminum's products as parts or components.**

Aluminum billets used in the manufacturing of aluminum extrusions are produced from elements extracted from the Earth's crust and recycled aluminum and may contain minute traces of impurities such as lead, cadmium, and mercury. None of these impurities are intentionally added as they are considered contaminants to our process.

As of this writing, Bonnell Aluminum confirms that its products may contain substances of very high concerns (SVHC) as identified under EU Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) Candidate List and CLP and/or substances restricted by the RoHS Directive. These substances when present are assumed below their thresholds: cadmium 0.01% by weight (100 parts per million [ppm]), lead 0.1% by weight (1000 ppm), mercury 0.1% by weight (1000 ppm), hexavalent chromium 0.1% by weight (1000 ppm).

Bonnell Aluminum products **do not contain** substances restricted by **BPR**.

Bonnell Aluminum is also committed to compliance with specific State requirements within the United States. **California Proposition 65<sup>v</sup>** does not have threshold limits and aluminum alloys typically contain lead, cadmium, and mercury at de minimus concentrations. Exposure to any of these elements that may be present could occur during fabrication (cutting, drilling, grinding) of Bonnell Aluminum's product. **Customer products containing products supplied by Bonnell Aluminum must be evaluated by the Customer whether a California Proposition 65 label is required.**

Bonnell Aluminum products **do not contain Polychlorinated Biphenyls (PCBs)**.

**Per- and polyfluoroalkyl substances (PFAS)** are a group of man-made chemicals that includes PFOA, PFOS, GenX, and many other chemicals. Bonnell Aluminum products **do not contain PFAS** chemicals, excluding any painted or coated products where PFAS chemicals may exist within the Customer's specified coating or paint.

Bonnell Aluminum's products **do not contain** any **asbestos**. Raw materials used in the production of Bonnell Aluminum's products do not contain any asbestos nor have the products come into contact with any asbestos during manufacturing, packing or shipping.

Paints and coatings applied by Bonnell Aluminum to the product as specified by the Customer may include additional restricted substances or chemicals as listed under California Proposition 65, REACH SVHC or RoHS, or EPA TSCA<sup>vi</sup>. Following the application process for the Customer's specified paints and coatings, it is assumed any regulated substances present in the Customer's specified paints and coatings will be below their respective thresholds (<0.1% w/w) based on paint concentrations and applied coating thickness.

Bonnell Aluminum will update this document annually in accordance with the regulations in effect at the date of publication. The Customer agrees to pay all costs and expenses relative to requests for updated documentation beyond the scheduled annual update and publication or requests to provide evidence of compliance.

*Carl Czarnik*

Carl Czarnik, Vice President of Operations  
Bonnell Aluminum, Inc.

---

<sup>i</sup> EU REACH 1907/2006: The Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation requires the identification of Substances of Very High Concern (SVHC) contained in substances and mixtures above the threshold 0.1% weight by weight manufactured and marketed in the EU. This declaration is inclusive of the **SVHC Candidate List, effective June 14, 2023**.

<sup>ii</sup> Regulation (EC) No 1272/2008 on the Classification, Labeling and Packaging of substances and mixtures (CLP): CLP introduces the United Nations globally harmonized system (UN GHS) for classification and labeling of chemicals into Europe. CLP entered into force on 20th January 2009. The CLP Regulation, Article 46, on Enforcement and Reporting, states that all necessary measures, including maintaining a system of official controls, to ensure that substances and mixtures are not placed on the market, unless they have been classified, labelled, notified, and packaged in accordance with this Regulation.

<sup>iii</sup> RoHS 2 Directive 2017/2102/EU (Amending Directive 2011/65/EU): The Restriction of Hazardous Substances (RoHS) Directive restricts the use of specific substances above an identified threshold, without applicable exemption, for products placed on the market in EU member states. Commission delegated Directive 2015/863 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances referred to in Article 4(1), **effective July 22, 2019**. The RoHS Directive currently restricts the use of ten substances: lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP).

<sup>iv</sup> Biocidal Properties Regulations (BPR) EC (528/2012) and EU (1062/2014): BPR requires the identification of Active Substances (as such term is defined in the Regulations) used in Biocidal products to be (i) registered and (ii) approved for use (from a list of approved active substances and suppliers). Biocidal products are substances or mixtures that contain Active Substances applied to articles with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by chemical or biological means.

<sup>v</sup> California Proposition 65 (Cal. Code Regs. Tit. 27 § 27001): requires the labeling of products containing any of the chemicals known to cause cancer, birth defects or other reproductive harm (Legal Reference Safe Drinking Water and Toxic Enforcement Act of 1986). Exposure levels and discharges to drinking water sources that are below the safe harbor levels are exempt from the requirements of Proposition 65. The current California Proposition 65 list is dated **August 11, 2023**.

<sup>vi</sup> U.S. EPA Toxic Substances Control Act (TSCA) (15 U.S.C. §2601 et seq. (1976)): requires reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Section 8 (b) of the TSCA requires EPA to compile, keep current and publish a list of each chemical substance that is manufactured or processed, including imports, in the United States for uses under TSCA. The non-confidential portion of EPA's TSCA Inventory is updated approximately every six months. The TSCA Inventory contains 86,718 chemicals, of which 42,242 are active, **effective August 2023**.