BENDER Group

Information on Product Compliance

for the Bender Group

DocID: res003-11043

1. Introduction

The Bender Group is strongly committed to ensuring that all relevant international legal provisions, customer requirements, standards, and the latest state of the art are taken into account when it comes to establishing product compliance.

We constantly monitor changes in regulations and immediately take these into account in the affected product life cycle phases. For this we proceed as follows:

- Our suppliers assure us that they comply with the statutory regulations and official requirements applicable to the respective contractual products, in particular with regard to environmental and safety requirements.
- Internal and external teams of experts review the products for the most important risk factors.
- Supplied parts undergo a quality control appropriate in scope and kind in the form of random sampling.
- In the case of anomalous analysis results, we immediately initiate quality assurance measures.
- Products within the scope of one or more EU CE marking Directives receive a CE marking and a standardised declaration of conformity.

As there are more and more enquiries about requirements from all over the world, we would like to provide an overview of the most common topics and the information we provide on them.

We ask for your understanding that not all questions can be answered here.

If your question is not answered here, please contact your sales contact at Bender or use one of the channels mentioned here.

2. Physical-technical aspects

2.1 Product safety, electromagnetic compatibility, radio equipment, measuring instruments

To ensure that the technical requirements for product safety, EMC, radio and measuring devices are met, Bender's approach is oriented towards achieving protection objectives.
Our highest priority here is the protection of life and limb.

Every effort is made to ensure that our products do not cause personal injury or damage to the environment or property.

2.2 CE marking

If a product falls within the scope of a CE-related legal provision (e.g. EU RED, LVD, EMC, MID, RoHS), it has been provided with the CE mark by Bender, and an EU declaration of conformity is available.

The abbreviations in the titles stand for the following Directives:

Acronym	Name of regulation	No.
EU RED	Radio Equipment Directive	2014/53/EU
EU LVD	Low Voltage Directive	2014/35/EU
EU EMC	Electro-magnetic Compatibility Directive	2014/30/EU
EU MID	Measuring Instruments Directive	2014/32/EU
EU RoHS	Restriction of Hazardous Substances Directive	2011/65/EU

EU declarations of conformity can be found on our website for the respective product family in the download area linked under the designation "CE declaration of conformity", e.g. here.

2.3 UKCA marking

Since Brexit, goods subject to labelling that are placed on the market in Great Britain (England, Wales and Scotland) must be marked with the label "UKCA" (United Kingdom Conformity Assessed).

If a product falls within the scope of a UKCA regulation (e.g. UK RED, LVD, EMC, MID, RoHS), by the end of the transition period on 31.12.2024 it will either – where possible – be marked directly by Bender with the UKCA mark or it will be provided with the relevant UKCA accompanying documents containing the UKCA mark, and a UK Declaration of Conformity will be available.
The abbreviations in the titles stand for the following regulations:

Acronym	Name of regulation	No.
UK RED	Radio Equipment Regulations 2017	S.I. 2017/1206
UK LVD	Electrical Equipment (Safety) Regulations 2016	S.I. 2016/1101
UK EMC	Electromagnetic Compatibility Regulations 2016	S.I. 2016/1091
UK MID	Measuring Instruments Regulations 2016	S.I. 2016/1153
UK RoHS	The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012	S.I. 2012/3032

We ask for your understanding that the UKCA requirements are implemented gradually at Bender and that we cannot yet list all devices as UKCA-compliant before 31.12.2024.

Where available, you will find a link to the UK declarations of conformity on our websites for the respective product family in the download area under the designation "UK declaration of conformity".

3. Aspects of legal requirements for chemicals (material compliance)

3.1 REACH

3.1.1 EU REACH

REACH stands for the EU Chemicals Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals.

As a manufacturer of electronic products, Bender acts in the role of a "downstream user" for the purposes of the REACH regulation.

Our products are exclusively articles, we do not supply substances or mixtures.

Bender also currently has no volume-based obligations to register articles.

Our products are not intended to release substances for the purposes of REACH, nor do they release regulated substances under normal or reasonably foreseeable conditions of use.

We continuously monitor the regular amendments and additions to Annexes XIV and XVII of REACH as well as the announcements of new candidate substances (SVHCs).

SVHCs are chemical substances that have properties of very high concern.
I. e. they can:
- cause serious and irreversible damage to human health and/or
- damage ecosystems in such a way that their structure and functioning are impaired in the long run.

Bender always takes into account the current SVHC candidate list of the European Chemicals Agency ECHA: https://echa.europa.eu/candidate-list-table.

For technical reasons, we temporarily comply with the obligation to inform about SHVC as per Article 33 of the REACH Regulation via our SCIP reporting to ECHA required by the EU Waste Framework Directive (EU-WFD).
If we have information on SVHC in Bender products, these have been reported to ECHA and can be retrieved by querying the Bender part number, here: https://echa.europa.eu/de/scip-database.

ECHA itself is responsible for the availability and linking of the data provided by Bender in the SCIP database.

Bender has no influence on this.

3.1.2 UK REACH

After Brexit, the UK has retained the basic principles of the EU REACH Regulation in UK REACH with "The REACH etc. (Amendment etc.) (EU Exit) Regulations".

Nevertheless, the UK REACH and EU REACH regulations must be taken into account independently of each other.
Regarding UK Reach, the statements made under EU REACH by Bender apply accordingly.
Currently Bender has no volume-based obligation to notify the British authority HSE (equivalent to the ECHA in the EU) of substances containing SVHC.

3.2 RoHS

3.2.1 EU RoHS

Directive 2011/65/EU serves to restrict the use of certain hazardous substances in electrical and electronic equipment.

It regulates the use and placing on the market of hazardous substances in electrical equipment and electronic components.

When providing information on 2011/65/EU, we take into account its extended scope (e.g. cables), the corresponding CE marking, the expiry dates of exemptions, and the additional substance bans according to the delegated version (EU) 2015/863.

The current supply chain situation constrains us, and we must consider the application of the valid exemptions of Annexes III and IV of 2011/65/EU in our EU RoHS compliant labelling.

Some products are therefore subject to RoHS exemptions, which are essentially those under 6.a, 6.c, 7.a, or 7.c-I.

Depending on the respective application, all new devices are designed to be lead-free wherever possible. Older devices will only be changed to low-lead or lead-free depending on requirements and reasonableness.
Products that fall directly within the scope of the EU RoHS are CE marked.

EU-RoHS-compliant products receive an EU Declaration of Conformity, which you can find linked in the download area on our website for the respective product family.

If you require detailed statements on RoHS exemptions applied in our products, please contact our environmental management at ecm@bender.de.

Ensuring RoHS compliance has a long tradition at Bender, as the first RoHS-compliant device left our production line as early as 2005.

Because we have all the supplier information on EU RoHS, we can offer our customers an overall declaration here:

Download: EU RoHS Declaration of Conformity – Full Product Range

3.2.2 Halogen-free

Halogens comprise one of the six non-metallic elements of group 17 of the periodic table, e.g. fluorine, chlorine, bromine, or iodine.

Many halogens or halogen compounds have been legally regulated for some time under e.g. EU POP, US TSCA, or as harmful greenhouse gases.

Where the use of halogens is not prohibited by law, "halogen-free" may be defined in standards.

For PCB production, for example, IEC 61249-2-21 is applied.
This standard requires that printed circuit boards must not contain more than a total of 1,500 ppm halogens.

In addition, this standard limits the amount of the specific halogens bromine and chlorine to no more than 900 ppm each.

In contrast to EU RoHS, compliance with these limits does not focus on the concentration in the homogeneous substance but, as with REACH, on the proportion in the article as a whole.

Bender does not currently apply "halogen-free" designs.
Also, the halogen chlorine can be contained in terminals, cables, cable assemblies, heat shrink tubing and wires.

Connectors and cables may also contain brominated or chlorinated flame retardants.

3.2.3 EU SRR, Hong Kong Convention, IHM

According to the "International Convention for the Safe and Environmentally Sound Recycling of Ships" (Hong Kong Convention), shipyards must draw up a hazardous materials inventory for every new ship.
This Inventory of Hazardous Materials (IHM) shall be prepared in accordance with Resolution MEPC.269(68).

Furthermore, the EU has adopted a Ship Recycling Regulation (EU) No 1257/2013 (EU-SRR) to facilitate the ratification of the Hong Kong Convention.

The EU SSR applies generally to all ships above a certain size from EU member states that operate across borders and to ships from third countries that call at a port or anchorage in an EU member state.

Also ships subject to EU SRR must carry an inventory of hazardous substances (IHM).
In order to prepare the IHM, shipyards require corresponding material declarations (MD) and supplier's declarations of conformity (SDoC) for all installed components.

Suppliers who, like Bender, work directly with shipyards must produce MDs and SDoCs for each component and/or assembly supplied.

Portable equipment and assembled printed circuit boards as such are exempt from both regulations, but not enclosure parts, cables or cable assemblies.

The substances listed in MEPC.269(68), Table A or identically in (EU) No 1257/2013, Annex I, such as asbestos, ozone-depleting substances, PCBs or PFOS, must not be used in Bender products.

For the substances listed in MEPC.269(68), Table B or identically in (EU) No 1257/2013, Annex II, please refer to our information on EU RoHS.

As long as no other information is available from our suppliers, we assume that our products are IHM-compliant.

It is Bender's aim to be able to provide its customers also with the respective MD and SDoC in individual cases on request after a corresponding verification starting with the first quarter of 2024.

3.2.4 UK RoHS

Currently the only difference between UK RoHS and EU RoHS is the UKCA marking.

For UK RoHS we therefore refer to the corresponding statements made by Bender under EU RoHS.

3.2.5 China RoHS

Certain Bender products are contained in the product catalogue of the Chinese RoHS (GB/T 26572).
We make equipment and packaging intended for the Chinese market compliant with SJ/T 11364-2014 and furnish these with an EFUP marking.

3.3 POP

3.3.1 EU POP, PFAS

In implementation of the Stockholm Convention of 2001 the second POP Regulation (EU) 2019/1021 is currently applicable in the EU.

It regulates the prohibition of persistent organic pollutants as they can remain in the environment for a long time without degrading naturally, accumulate in the food chain, and harm human health and the environment.

Since 2020, a subgroup of perfluorooctanoic acid (PFOA), PFAS and its salts, as well as PFOA precursors have also been banned under EU POP.

We currently have no information that Bender products contain persistent organic pollutants or PFAS or that such substances are used in production processes.

3.3.2 US TSCA

The Toxic Substances Control Act (TSCA) regulates the manufacture, processing, distribution, use and disposal of commercial and industrial chemicals in the USA.

The US EPA is responsible for its implementation.

The EPA regulation "Persistent, Bioaccumulative and Toxic (PBT) Chemicals" under TSCA Section 6 refers to persistent chemicals similar to those regulated the EU POP regulation.

We currently have no information that would cast doubt on the compliance of Bender products with regard to TSCA.

3.3.3 US Maine PFAS

To the best of our information, no PFASs are intentionally added to Bender products, but we cannot rule out their presence in traces.

We work under the assumption that Bender products are not affected by the corresponding requirements of the US State of Maine.

3.4 Conflict minerals

Bender is a privately owned company and is not currently subject to conflict minerals legislation.

Nevertheless, we are aware of our social responsibility and stand behind the regulatory goal to prevent the funding of armed groups through the extraction and trade of mineral raw materials as well as to curb associated human rights violations.

We do not procure directly from smelting works.

Conflict minerals, if any, may be present in our products only in already processed form.

Due to the complexity of the supply chains and since Bender's material procurement is far removed from the original smelter, clear traceability back to the smelter is not possible.

As a manufacturer, we are therefore not in a position to certify the country of origin of the minerals contained in the products manufactured by our suppliers.

However, we will pass on pertinent information regarding products in the supply chain that, to our knowledge, may contain conflict-related materials, provided it is communicated to us by the component manufacturers themselves or our suppliers.

3.4.1 US Dodd-Frank Act (DFA)

The Dodd-Frank Act, which has been in force in the USA since 2010, regulates under Section 1502 disclosure and reporting obligations for US listed companies regarding the use of certain raw materials originating from the Democratic Republic of the Congo or its neighbouring states.
The raw materials tantalum, tin, gold, and tungsten are considered conflict minerals if their extraction and the trade in these raw materials contribute to the financing or other type of support of armed groups in the Democratic Republic of the Congo or its neighbouring states.
As a non-US listed company, Bender has no legal obligation to comply with the conflict minerals requirements of Section 1502 of the Dodd-Frank Act.

3.4.2 EU Conflict Minerals Regulation

The Conflict Minerals Regulation (EU) 2017/821 is aimed at companies importing raw materials into the EU.
As a result, EU importers of the conflict minerals tin, tantalum, tungsten, their unprocessed ores and gold (3TG) have become also subject to extensive due diligence and verification obligations along the supply chain.
Bender does not currently import any such raw materials into the EU.
Therefore, also Regulation (EU) 2017/821 is not applicable to us.

3.4.3 CMRT

Nevertheless, in order to assist our clients in complying with their conflict minerals reporting obligations, we voluntarily provide information in the form of a CMRT (Conflict Minerals Reporting Template) within the limits of our capabilities.
The information in the CMRT is primarily based on information from our upstream suppliers.
Additionally, we use the information from the Silicon Expert database to obtain further information on conflict minerals directly from producers and manufacturers.
We already take this information into account when selecting our components.
Please note that especially the CMRT data on smelting works can be incomplete and lead to error messages when they are imported into customer databases.
We ask for your understanding that we cannot provide any further information or assistance via special questionnaires, lists, forms, or web portals here.
You can download our current CMRT here.

3.4.4 EMRT

Bender is not yet able to provide an Extended Minerals Reporting Template (EMRT) for cobalt and mica.
Bender is currently not subject to any legal obligation to do so.

3.5 Greenhouse gases

3.5.1 Montreal Protocol

{TBD}

3.5.2 Carbon footprint

Bender recognises climate change as one of the greatest human challenges.
To make our commitment to climate and environmental protection tangible, we draw up our carbon footprint in accordance with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard.

3.5.3 US GHG / Clean Air Act

{TBD}

4. Eco-efficiency, recycling management (circular economy), waste

4.1 Devices

At present, the devices developed and manufactured by Bender are not subject to any statutory eco-design requirements known to us.

In accordance with Bender's quality policy, we take into account the latest findings from science and technology so that we can offer our customers devices that are as efficient and ecologically sound as possible.

4.2 Batteries

Some Bender products are equipped with long-life device batteries.

Bender does not manufacture these batteries.

When procuring them, we pay attention to the applicable legal requirements and the specifications laid down in standards and, in particular, take into account the new legal framework aimed at by EU policy, with which batteries are to be made more sustainable, more recycling-oriented and safer than before, effective from 2024.

4.3 Packaging

4.3.1 EU and EU member states

Bender complies with the requirements of the EU and its member states for product and transport packaging.

4.3.2 US TPCH

{TBD}

4.4 Waste

4.4.1 EU WEEE

Bender is registered with the Waste Electrical Equipment Register (EAR) under the WEEE number "DE 43 124 402".

We will take back devices that are no longer to be used which were purchased after 23 March 2006 free of charge.

Please register any return via our online form.

4.4.2 EU WFD, SCIP

Bender makes all relevant SCIP entries on an ongoing basis.

You can find more information here in the section on EU REACH.

5. Sustainability & human rights

5.1 EU supply chain Directive (CSRD)

Directive (EU) 2022/2464 regarding corporate sustainability reporting still needs to be transposed into national law by 6 July 2024.

It is also referred to as the EU Supply Chain Law.

Bender is following events closely and plans to introduce a corresponding sustainability reporting system from 2025.

5.2 German Supply Chain Act (LkSG)

The business activities of Bender's German sites will be subject to the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (abbreviated to: Supply Chain Act or LkSG) from 1 January 2024.

We are currently preparing everything necessary for this.

We are aware that some of our customers have already been subject to these requirements since 1 January 2023, and we expect corresponding enquiries about this.

In this respect, we ask for your understanding that Bender will not be able to comprehensively answer all questions before Q1-2025.