



HUGRO-Armaturen GmbH • Rudolf-Blessing-Str. 5 • 79183 Waldkirch

## **Declarations of material conformity**

To the best of our knowledge, no HUGRO products contain any substances that are prohibited from being placed on the market. We are in close contact with our production partners and suppliers at all times and also monitor relevant changes and adjustments in the market and in legislation.

This declaration applies to all HUGRO products and services and has been prepared based on current knowledge. We reserve the right to amend the following declarations accordingly in the event of changes.

1. **REACH-declaration (EG) Nr. 1907/2006**  
**POP-declaration (EU) 2019/1021**  
**Montrealer protocol und F-Gase declaration (EU) Nr. 517/2014**
2. **RoHS-Directive 2011/65/EU - amendment 2015/863**  
**Restriction of Hazardous Substances (RoHS)**
3. **Toxic Substances Control Act (TSCA) - Compliance Certificate**
4. **Statement on the use of conflict minerals (Dodd-Frank Act)**
5. **POP 65 - California Proposition 65**  
**Safe drinking water and toxic enforcement act of 1986**
6. **SCIP-sheet**
7. **PFAS**  
**Compliance with EU rules on the use of per- and polyfluoroalkyl**

All of the above confirmations and declarations are also available on our website at [www.hugro.com/services/download](http://www.hugro.com/services/download).

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## **Declarations regarding compliance with further requirements and regulations**

Compliance with all of the requirements and regulations listed below is an essential obligation for HUGRO. This applies to all of our actions, and we expect the same from all of our production partners and suppliers.



HUGRO-Armaturen GmbH • Rudolf-Blessing-Str. 5 • 79183 Waldkirch

**8. Environmental management - Sustainability**

**9. 2014/512/CFSP and Regulation (EU) No. 833/2014**

**Confirmation: Unconditional compliance with and observance of all restrictive measures against Russia**

**10. Dual-Use-declaration (VO (EU) 2021/821)**

All of the above confirmations and declarations are also available on our website at [www.hugro.com/services/download](http://www.hugro.com/services/download).

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Mit freundlichen Grüßen

**HUGRO Armaturen GmbH**

ppa. Ralf Kaszemek



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**1.**

**REACH-Verordnung (Verordnung (EG) Nr. 1907/2006)**

**POP-Verordnung (Verordnung (EU) 2019/1021)**

**Montrealer Protokoll und F-Gase Verordnung (Verordnung (EU) Nr. 517/2014)**

Waldkirch, June 2025

This declaration is made with reference to the guidelines and regulations listed below. The declaration is made on the basis of our current knowledge. We are in constant contact with our suppliers in order to always be able to provide up-to-date information regarding the ingredients of our products. As soon as we become aware of any deviating information, we will inform you immediately.

**REACH Regulation (Regulation (EC) No 1907/2006)**

Article 33 of the European Union legislation on chemicals (1907/2006 REACH) requires all those involved in a supply chain to provide information on SVHC concentrations above 0.1% weight by weight (w/w) in their products.

The declaration was prepared on the basis of the current candidate list (with 250 substances) for Annex XIV REACH Regulation at the time of issue. This can be viewed at the following link:

<https://echa.europa.eu/de/candidate-list-table>

Additional SCIP information is available at <https://echa.europa.eu/de/scip-database>

- We are in contact with the pre-suppliers of relevant raw materials which are processed in our products and we require a binding statement on whether the raw materials contain any listed SVHCs in a concentration above 0.1% w/w.
- EU pre-suppliers of articles which are processed in our products in relevant quantities are also obliged to inform us immediately and without being asked if any of the products they supply contain an SVHC in a concentration above 0.1% w/w. Should we receive information to this effect from our suppliers and thereby gain knowledge that the 0.1% w/w threshold for SVHCs has been exceeded in our products, we will inform you immediately.
- We enter into separate agreements with all non-EU pre-suppliers of articles processed in our products in relevant quantities, as they are not automatically subject to the obligation to provide information stipulated by REACH. For this reason, we require non-EU suppliers to confirm in writing that we will be informed immediately if the 0.1% w/w threshold for SVHCs is exceeded in a product supplied to us.

Cable glands and accessories made of brass contain a lead content (CAS Nr.: 7439-92-1) of > 0.1%. Upon request, we will be happy to provide you with a detailed overview of the affected products including the SCIP numbers.

With the exception of the above-mentioned exception, there is currently no indication that our products contain SVHC substances in relevant concentrations.



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### **POP Regulation (Regulation (EU) 2019/1021)**

the POPs Regulation lays down detailed requirements regarding the production, placing on the market, use and release of persistent organic pollutants (POPs). It also deals with the restriction of releases of such substances and the establishment of provisions for the disposal of waste consisting of, containing or contaminated by such substances.

The POP Regulation is the European (EU) implementation of the Stockholm Convention on Persistent Organic Pollutants.

We confirm that none of the substances listed in the Stockholm Convention are contained in our products.

### **Montreal Protocol and F-Gases Regulation (Regulation (EU) No. 517/2014)**

The Montreal Protocol (to the Vienna Convention for the Protection of the Ozone Layer) is a global agreement to protect the Earth's stratospheric ozone layer by phasing out chemicals that deplete it. This phase-out includes both the production and consumption of ozone-depleting substances.

The Montreal Protocol was agreed in 1987 and entered into force in 1989. It has been revised and amended several times since then. Its most recent amendment is the Kigali Amendment and has been implemented in the EU by Decision (EU) 2017/1541 and has been in force since 2017.

Furthermore, the F-Gases Regulation is additionally applicable in the EU with the aim of reducing emissions of certain fluorinated greenhouse gases.

We confirm that all our products comply with the requirements of the Montreal Protocol and the F-Gas Regulation.

Best regards

**HUGRO Armaturen GmbH**

ppa. Ralf Kaszemek



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## 2. RoHS-Directive 2011/65/EU – amendment 2015/863 Restriction of Hazardous Substances (RoHS)

Waldkirch, June 2025

Dear Sir or Madam,

We have been working together with our suppliers to check our products in accordance with Directive 2011/65/EU. According to our raw material suppliers, the products you have received do not contain any substances which are banned from the market or must be declared according to Directive 2011/65/EU and its amendment 2015/863.

Please find add SCIP information on <https://echa.europa.eu/de/scip>

- Brass cable glands and accessories have a lead content of 2–3.5%. Currently, alternatives to the use of copper alloys containing up to 4% lead by weight cannot be considered scientifically or technically practicable. The exemption 6(c) of Annex III to Directive 2011/65/EU therefore permits the use of lead as an alloying element in copper containing up to 4% lead by weight for the categories 1 to 7 and 10 for the time being until 21 July 2021.
- Hexavalent chromium salts are present in chromed products. The amount does not exceed the total concentration of 0.1% permitted by Annex II to Directive 2011/65/EU.
- Our plastic products contain neither pentabromo derivatives (CAS No. 32534-81-9) nor octabromo derivatives (CAS No. 32536-52-0).
- Our products do not contain cadmium or mercury.
- Our products do not contain PBB, PBDE or deca-BDE.
- Our products also do not contain DEHP, BBP, DBP, or DIBP.

According to our current understanding, the products we deliver to you are free from all substances which the RoHS prohibits from being placed on the market.

Sincerely,

**HUGRO Armaturen GmbH**

ppa. Ralf Kaszemek



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### 3. Toxic Substances Control Act (TSCA) Compliance Certificate

Waldkirch Juni 2025

On January 6, 2021, the United States Environmental Protection Agency (EPA), which is considered the counterpart to the European Chemicals Agency (ECHA), finalized the rules of the Toxic Substances Control Act (TSCA) Section 6 (h). These rules were enacted to reduce exposure to the PBT chemicals listed below and became legally effective in March 2021.

Two of the five chemicals are already covered by REACH/SVHC or POP in Europe (as of June 2021). The remaining three are not yet listed in the SVHC list, but will continue to be declared separately with this declaration.

Decabromodiphenyl ether (DecaBDE)	CAS 1163-19-5
Phenol, isopropylated, phosphate 3:1 (PIP 3:1)	CAS 68937-41-7
2,4,6-Tris(1,1-dimethylethyl)phenol (2,4,6-TTBP)	CAS 732-26-3
Hexachlorobutadiene (HCBd)	CAS 87-68-3
Pentachlorobenzene thiol (PCTP)	CAS 133-49-3

HUGRO Armaturen GmbH is committed to environmental and health safety. Based on our knowledge and that of our suppliers, none of our products contain any substances from the TSCA list as listed above.

Best regards

**HUGRO-Armaturen GmbH**

ppa. Ralf Kaszemek



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#### 4.

#### Statement on the use of conflict minerals (Dodd-Frank Act)

Waldkirch, June 2025

Dear Sir or Madam,

The U.S. Securities and Exchange Commission has adopted a new version of the Dodd-Frank Act. The legislation expands on Section 1502 which concerns the subject of conflict minerals. In doing so, it addresses the trading of minerals and their derivatives which originate in countries affected by armed conflicts.

Concerned are the following raw materials and their derivatives:

- Tantalum
- Tin
- Tungsten
- Gold

This legislation requires suppliers of publicly-listed U.S. companies to produce evidence by 31 May 2014 and thereafter on an annual basis to demonstrate that the minerals/materials used do not originate in countries where armed conflicts are taking place and that the use of these substances does not contribute to supporting/financing said conflicts.

HUGRO Armaturen GmbH takes its responsibilities extremely seriously. As a result, all suppliers in question are requested to disclose the origin of the minerals listed and to confirm in writing their compliance with the provisions of the Dodd-Frank Act (the prevention of trade with raw materials from conflict regions).

Our suppliers and pre-suppliers have assured us that the relevant minerals/materials in their products do not come from regions where the revenue from the minerals trade could be used to finance armed conflict.

There is therefore no reason to suggest that our products contain conflict minerals.

Best regards

**HUGRO Armaturen GmbH**

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5.

## **POP 65 - California Proposition 65 Safe Drinking Water and Toxic Enforcement Act of 1986**

Waldkirch, June 2025

Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, California Proposition 65 requires businesses to warn Californians when exposure to toxic chemicals known to the state may cause cancer, birth defects, or other reproductive harm.

California Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, requires companies to warn Californians when exposure to toxic chemicals known to the state may cause cancer, birth defects or other reproductive harm.

Proposition 65 requires companies to label products that are known or intended to expose a person to a chemical known to the State of California to cause cancer or reproductive toxicity.

To ensure that our products are always in compliance with current regulatory requirements, we review them regularly and maintain close contact with our production partners for Brass cable glands and accessories contain lead.

Lead is classified as a carcinogen and reproductive toxicant under Proposition 65 and must be labelled as such in the State of California:

Please take information for all details from attached SCIP-sheet.  
(pls see 2<sup>nd</sup> page)

Best regards

**HUGRO Armaturen GmbH**

ppa. Ralf Kaszemek





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## 6. SCIP sheet

Product names	Identifiers	Reference number (SCIP NUMBER)	SVHC Substance	CAS-Number of SVHC Substance
Feststeller MS Kupplung, Feststeller MS Kupplung (Feststeller Ms M mit metrischem Gewinde)	319.XX.XX	ba7c068b-0c6d-41c1-bfbb-72618617f1d8	Lead	7439-92-1
Endtüllen Stabilisierungshülsen für Schutzschläuche, Endtüllen Stabilisierungshülsen (Endtülle Pg)	721.XXXX.XX, 721.XXXX.XA	19ed69cf-78c5-43ed-a9a5-25685d868161	Lead	7439-92-1
KV EXIOS 116 für armiertes Kabel, KV EXIOS 116 für armiertes Kabel (KV EXIOS M, KV EXIOS NPT mit metrischem und NPT - Gewinde)	116.XXXXXX	fbd56fb1-60ed-4706-8044-5feadedc449e	Lead	7439-92-1
Barrier KV CR-C, CR-U, CR-X, Barrier KV CR-C, CR-U, CR-X mit metrischem Gewinde	XCC.XXXXXX.XX, XCC.XXXXSXXX.XX, XCC.XAXAXX.XX, XCC.XFXFXX.XX, XCC.XAXAXX.XX, XCC.XXXXSXXX.XX, XCU.XXXXXX.XX, XCU.XXXXSXXX.XX, XCU.XAXAXX.XX, XCU.XFXFXX.XX, XCU.XAXAXX.XX, XCU.XXXXXX.XX, XCC.XXXXSXXX.XX, XCU.XAXAXX.XX, XCU.XFXFXX.XX, XCU.XXXXXX.XX	91b3aa1b-086e-494b-9f78-de6133b80ff8	Lead	7439-92-1
KV Blue Globe-MS, KV Blue Globe-MS (KV Blue Globe Ms M mit metrischem Gewinde)	103.XXXXXX.XX, 103.XFXXXX.XX	c8f5944b-2038-43c7-a4c0-7fd31c5fd99d	Lead	7439-92-1
KV SKINTOP, standard und EMV - Version, KV SKINTOP (KV SKINTOP-M Pg, KV SKINTOP-M M mit metrischem und PG-Gewinde) KV SKINTOP-SC Pg, KV SKINTOP-SC M mit metrischem Gewinde und PG - Gewinde, KV SKINTOP-BRUSH M mit metrischem Gewinde	153.XXXX, 153.XRXX, 153.XAXX, 153.XRXX, 153.XXXX.XX, 159.XXXX, 159.XXXX.XX, 159.XAXX.BK, 159.XRXX.BK, 159.XXXX.BK, 159.XRXX.BK	ba756585-b1a1-4844-b72b-7b3155b8290c	Lead	7439-92-1
KV EXPLO und KV Ex-Compact für Ex d e, KV EXPLO und KV Ex-Compact (KV EXPLO Ms Pg, KV EXPLO Ms G, KV EXPLO Ms M mit metrischem, NPT und Gasgewinde) KV EX Compact M, KV EX Compact / ZE-EX M mit metrischem Gewinde	118.XXXX, 118.XXXX.XX, 118.XXXX.XX.ZE	a5302b4a-53d2-42e8-b928-2ea3cf204cd1	Lead	7439-92-1
KV EF 115.01 Ex d e für armiertes Kabel, KV EF 115.01 Ex d e für armiertes Kabel (mit metrischem und NPT - Anschlussgewinde KV EF Ms M, KV EF Ms NPT)	115.XXXX.XX.W, 115.XXXX.XX.WR, 115.XXXX.XX.W, 115.XAXA.XX.WE, 115.XAXA.XX.WR, 115.XXXX.XX.WR, 115.XXXX.XX.W, 115.XFXF.XX.W, 115.XXXX.XX.WR	b61defcb-f624-44b9-9434-41399e48766f	Lead	7439-92-1
KV ALF Ex d e, KV ALF Ex d e (mit metrischem und NPT - Anschlussgewinde KV ALF Ms M, KV ALF Ms NPT)	119.XXXX.XX, 119.XXXX.XX, 119.XAXA.XX, 119.XXXX.XX, 119.XFXF.XX	2e84bd1b-c807-4bfe-980b-cdc06bee483d	Lead	7439-92-1
Schiffskabelverschraubung nach DIN 89280 mit entsprechenden Innenteilen Ausrüstungsart W / Z, KV DIN 89280 mit metrischem und PG - Anschlussgewinde (KV 89280 Ms Pg X, KV 89280 Ms Pg XX, KV 89280 Ms M, KV Innenteile 89280 WXX, KV Innenteile 89280 WXXX, KV Innenteile 89280 ZXX, KV Innenteile 89280 ZXX AXX, KV Innenteile 89280 ZXX EE Xaa)	129.XXXX.WXXX, 129.XXXX.WX, 129.XXXX.ZXX, 129.XXXX.ZX, 129.XXXX.ZXX.X, 629.WXXX, 629.WXXX, 629.ZXXX	ffd4a454-c54f-4e6a-9a92-61d6b8597ae5	Lead	7439-92-1
Klemmring für Schlauchverschraubung, Klemmring für Schlauchverschraubung (Klemmring MS für Schl. AD XX mm)	611.XX	22e2c493-2bf6-45a0-ac32-19e882aefaa	Lead	7439-92-1
KV mit Zugentlastung, mit Zugentlastung und Knickschutz, mit Zugentlastung und Biegeschutz, KV mit Zugentlastung, Biegeschutz und Knickschutz mit PG und metrischem Gewinde (KV Zug Ms, KV Zug Ms Uni/NBR, KV ZE/Knicksch. Ms, KV BS-ZUG Ms, KV BS-ZUG Ms, KV BS-ZUG Ms Uni/NBR)	140.XX, 140.XXXX, 140.XXXX.XX, 140.XX.XX, 142.XX, 142.XXXX, 142.XX.XX, 142.XXXX.XX	fb78e39e-f97f-49f6-8edd-92642ce1c2f4	Lead	7439-92-1
Erweiterungen, Reduktionen und Übergangsstücke, Erweiterungen, Reduktionen und Übergangsstücke nach DIN 46320 mit und ohne O-Ring, Ex e, Ex d - Varianten. (mit PG, metrischem, NPT oder entsprechenden Gewindekombinationen)	530.XXXX, 530.XXXX.EX, 530.XXXX.SK, 524.XXXX, 526.XXXX, 527.XXXX, 527.XXXX.XX, 527.XXXX.EX, 531.XXXX.XX, 531.XXXX.EX, 535.XXXX.XX	1908d524-fd6e-4a16-8eb6-4cad44bd6210	Lead	7439-92-1
KV Standard, KV DIN 46320, mit PG und metrischem Gewinde, einfacher und Universal - Dichteinsatz, FLAKA - Version für Flachkabel	121.XX, 121.XX.XX, 138.XX, 138.XXXX	c9143f5a-c0d8-48fa-9092-cd969be98f24	Lead	7439-92-1



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## 7.

### PFAS

#### Compliance with EU rules on the use of Per- and Polyfluoroalkyl substances

Waldkirch, Juni 2025

On 7 February 2023, the European Chemicals Agency (ECHA) published the proposal for a ban on the manufacture, use and placing on the market (including import) of per- and polyfluoroalkyl substances (PFAS). The aim of the ban is to reduce the release of PFAS into the environment.

According to the latest estimates, the PFAS substance group comprises more than 10,000 different substances, the identity and uses of which are only partially known. The most common representatives include PFOS, PFOA, PFT and PFC.

Due to the variety of uses and the difficulty of substitution in some cases, a ban is a complex and time-consuming process. For this reason, the authorities initially only regulated those PFAS that were detected in the highest concentrations in the environment and whose effects on the environment or human health could be justified. In the past, however, this approach has led to the regulated PFAS being partially replaced by other, as yet unregulated PFAS.

The following regulations currently exist for perfluoroalkyl and polyfluoroalkyl substances in the EU:

- Perfluorooctane sulfonates (PFOS; perfluorooctane sulfonic acid, metal salts, halides, amides and other derivatives including polymers) and preparations with a mass content of 0.001% PFOS are listed in Annex I, Part A of Regulation (EU) 2019/1021 (POP).
- PFOA (perfluorooctanoic acid, C8), including its salts and related compounds, was added to Annex A of the Stockholm Convention in 2019. This ban was implemented in the European Union on 8 April 2020 with Delegated Regulation (EU) 2020/784. In mixtures, the upper limit for PFOA is 25 ppb and for PFOA precursor compounds 1000 ppb.
- PFHxS (perfluorohexane sulfonic acid, C6) including its salts and related compounds was added to Annex A of the Stockholm Convention in 2022. In order to ensure that waste containing PFHxS is managed in accordance with the Convention, the substance was also included in Annexes IV and V of Regulation (EU) 2019/1021 (POPs). Inclusion in Annex I is still pending.





**HUGRO®**  
Qualität aus Waldkirch

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- Since 25 February 2023, the placing on the market, manufacture and use of C9-C14 perfluorocarboxylic acids (PFNA, PFDA, PFUnDA, PFDoDA, PFTTrDA, PFTTeDA) have been restricted in Annex XVII, point 68 of Regulation (EC) 1907/2006 (REACH).
- In the EU, PFOA, PFHxS, HFPO-DA, PFBS and the C9-C14 perfluorocarboxylic acids (PFNA, PFDA, PFUnDA, PFDoDA, PFTTrDA, PFTTeDA) were also evaluated as substances of very high concern (SVHC) in the sense of Regulation (EC) 1907/2006 (REACH).

We hereby confirm that we comply with the current legal requirements for PFAS within the EU. However, we cannot completely exclude the possibility that some of our articles contain non-regulated PFAS.

However, we are monitoring the legal and regulatory developments in this area very closely. Should the legal situation change and a direct information obligation arise, we will inform you in good time.

Mit freundlichen Grüßen / Best regards

**HUGRO-Armaturen GmbH**

ppa. Ralf Kaszemek



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## 8. Environmental management - Sustainability

Dear Sir or Madam

Because of our company size and -structure we have done it without installing a separate environmental management according to DIN ISO 14001.

Since January 2025, HUGRO has been certified according to "SUSTAINABILITY RATING" (ecovadis). For details, please refer to our website at [www.hugro.com/services/downloads](http://www.hugro.com/services/downloads)

We would like to point out that we adhere to national and international guidelines.

Best regards

**HUGRO Armaturen GmbH**

ppa. Ralf Kaszemek



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9.

**2014/512/CFSP and Regulation (EU) No. 833/2014**

**Confirmation: Unconditional compliance with and observance of all restrictive measures against Russia**

Due to Russia's actions, which have destabilized the situation in Ukraine, the European Union has imposed sanctions against Russia. The legal basis for the sanctions measures is Decision 2014/512/CFSP and Regulation (EU) No. 833/2014.

In response to Russia's attack on Ukraine, the European Union has expanded and tightened the measures in place since 2014 to include extensive economic and financial sanctions. These relate in particular to export and import restrictions, restrictions in the area of capital markets, rating services, auditing and tax advisory services, as well as services in the fields of architecture and engineering, legal advice, and IT consulting.

We confirm our unconditional compliance with and observance of all restrictive measures against Russia.

Kind regards

**HUGRO-Armaturen GmbH**

ppa. Ralf Kaszemek



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10.

## Dual-Use-Verordnung (VO (EU) 2021/821)

Waldkirch, 01.07.2025

„NO DUAL USE“ for HUGRO products and HUGRO services

Dear HUGRO-customer,

We hereby confirm that all HUGRO products and HUGRO services are designed and manufactured exclusively for civilian purposes.

### 1. Intended use

All products and services are intended exclusively for civilian use.

### 2. Technical specifications:

The technical characteristics and functions are designed in such a way that no military application is possible or supported.

### 3. Trade restrictions:

We have no knowledge of any intention or possibility that our products and services will be used for military applications.

### 4. Compliance:

We are committed to complying with all relevant national and international regulations concerning dual use.

This declaration is intended to provide clarity about the intended use and characteristics of HUGRO products and HUGRO services.

**HUGRO Armaturen GmbH**

ppa. Ralf Kaszemek