

AMPCO METAL S.A.

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Date of issue: 12th May 2026

Document reference: AMPCO-DEC-RoHS-2026-01

Declaration of material compliance with Directive 2011/65/EU (RoHS) as amended by (EU) 2015/863**To whom it may concern**

This declaration confirms the position of AMPCO METAL S.A. and its group entities ("AMPCO") regarding the supply of copper-based alloys in respect of Directive 2011/65/EU of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS), as amended by Commission Delegated Directive (EU) 2015/863 (RoHS 3).

Scope of this declaration

This declaration covers all alloys placed on the market by AMPCO in the AMPCO®, AMPCOLOY®, AMS and Standard Alloys product ranges, supplied as semi-finished metallurgical products (bars, plates, tubes, profiles, castings). AMPCO supplies these products as raw material inputs. Whether RoHS applies to a given application is determined by the finished electrical or electronic equipment ("EEE") into which the alloy is integrated. Responsibility for finished-product RoHS conformity rests with the EEE manufacturer.

Restricted substances under RoHS as amended

Directive 2011/65/EU as amended by (EU) 2015/863 restricts the following ten substances in homogeneous materials at the maximum concentration values stated:

- Lead (Pb): 0.1% w/w
- Mercury (Hg): 0.1% w/w
- Cadmium (Cd): 0.01% w/w
- Hexavalent chromium (Cr⁶⁺): 0.1% w/w
- Polybrominated biphenyls (PBB): 0.1% w/w
- Polybrominated diphenyl ethers (PBDE): 0.1% w/w
- Bis(2-ethylhexyl) phthalate (DEHP): 0.1% w/w
- Butyl benzyl phthalate (BBP): 0.1% w/w
- Dibutyl phthalate (DBP): 0.1% w/w
- Diisobutyl phthalate (DIBP): 0.1% w/w

Position of AMPCO

Mercury, cadmium, hexavalent chromium, polybrominated biphenyls, polybrominated diphenyl ethers and the four restricted phthalates are not constituents of AMPCO copper-based alloys, are not intentionally added at any stage of production, and are present at concentrations below the maximum concentration values stated above.

Lead is present above the 0.1% w/w threshold in specified AMPCO grades. For those grades, the position is governed by Annex III, exemption 6(c) of Directive 2011/65/EU: "Copper alloy containing up to 4% lead by weight."

Grade-by-grade position on lead

Group A — Grades within Annex III exemption 6(c) ($Pb \leq 4\%$ by weight). Eligible for use in EEE under the exemption.

Grade	Designation	Lead content
CuSn12-C	CC483K	up to 0.7%
CuSn11Pb2-C	CC482K	0.7 – 2.5%
CuSn10-C	CC480K	up to 1.0%
CuSn10Zn (RG10)	2.1086	up to 1.5%
CuZn39Pb3 (MS58)	CW614N	2.5 – 3.5%
CuZn36Pb2As	CW602N	1.7 – 2.8%
CuZn37Mn3Al2PbSi	CW713R	0.2 – 0.8%
CuZn35Ni3Mn2AlPb	CW710R	0.2 – 0.8%
TENAX K	—	0.2 – 0.8%
CuZn31Si1	CW708R	up to 0.8%
CuZn40Mn2Fe1	CW723R	up to 0.5%
CuZn34Mn3Al2Fe1-C	CC764S	up to 0.3%
CuZn25Al5Mn4Fe3-C	CC762S	up to 0.2%

Group B — Grades exceeding Annex III exemption 6(c) (Pb > 4% by weight). Exemption 6(c) is not applicable to these grades.

Grade	Designation	Lead content
CuSn7Zn4Pb7-C	CC493K	5.0 – 8.0%
CuSn5Zn5Pb5-C	CC491K	4.0 – 6.0%
CuSn10Pb10-C	CC495K	8.0 – 11.0%
CuSn7Pb15-C	CC496K	13.0 – 17.0%

For Group B grades, RoHS exemption 6(c) does not apply. These grades are not RoHS-compliant for EEE applications without an alternative applicable Annex III or Annex IV exemption. Customers integrating these grades into EEE are responsible for confirming the availability of an alternative exemption appropriate to the specific application.

Aluminium bronzes, AMPCOLOY and AMS grades

AMPCO® aluminium bronze alloys (including AMPCO 18, AMPCO M4 and equivalent grades), AMPCOLOY® high-copper alloys and AMS aerospace bronzes do not contain lead above trace levels. These grades are compliant with RoHS in respect of all ten restricted substances.

Validity and review

This declaration is valid for twelve months from the date of issue, unless superseded earlier by an updated declaration. AMPCO reviews this declaration annually and at any event triggering material change to alloy compositions, production processes, or the underlying regulation.

Signed:

Nicholas Achment

Group Head of Risk, IMS and ESG

AMPCO METAL S.A.

Signature: ACHMENT

Date: 12/May/2026