



Milan, 2025-07-01

## **RoHS Declaration**

## Slip Rings

RAVIOLI S.p.A. is aware that the EU Directive 2011/65/EU and subsequent amendments and additions (such as the Commission Delegated Directive 2015/863 known also as RoHS III) is limiting the use of certain hazardous substances in electric and electronic equipment.

In particular, the restricted substances are:

- 1. Mercury (Hg)
- 2. Hexavalent chromium (Cr6)
- 3. Cadmium (Cd)
- 4. Flame retardant and plasticizers PBB, PBDE, DEHP, BBP, DBP, DIBP
- 5. Lead (Pb)

The following statement regarding conformity of our products to the EU Directive 2011/65/EU and subsequent amendments and additions is based on our actual research and inquiries with our suppliers:

- RAVIOLI S.p.A. Slip Rings series comply with relevant local environmental legislation
- RAVIOLI S.p.A. does not manufacture nor deliver materials or parts containing hazardous substances above the threshold limit (Lead RoHS exemptions might be applied for compliances on component level: 6a, 6c)

Yours sincerely Roberto Rlandi

Ing. Roberto Orlandi QUALITY ASSURANCE





Milan, 2025-07-01

## **REACH Declaration**

## Slip Rings

REACH is a EU law on chemicals and their safe use. It is referred to Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and, according to it, most chemicals (chemical substances) must be pre-registered.

RAVIOLI S.p.A. hereby declares:

- We do not produce nor import chemical substances. We therefore do not have to register any substances or notify the European Chemical Agency (ECHA) on any of the substances use
- As "downstream user" in terms of this regulation we give attention to the substances, preparations and articles used in our products and ensure they are registered according the REACH.
- We are aware of the candidate list of Substances of Very High Concern (SVHC), issued by the ECHA and published on the following link <a href="https://echa.europa.eu/en/candidate-list-table">https://echa.europa.eu/en/candidate-list-table</a>
- We are working with suppliers to ensure products supplied are evaluated and assessed to ensure substance listed on the latest candidate list in a concentration above 0,1% w/w are identified
- We will continue to work with our suppliers to ensure compliance with future candidate list as they are published by ECHA
- Based on the present and best of our knowledge and based on information available to us received from the supply chain, some components within the product supplied contain lead in concentrations higher than 0,1% w/w (where RoHS exemptions do apply as mentioned in our RoHS declaration). This declaration refers to component concentration (article, as defined in the REACH Regulation), not to the concentration in the final product (complex article, as defined in the REACH Regulation)

Yours sincerely

Ing. Roberto Orlandi QUALITY ASSURANCE





Milan, 2025-07-01

# **Conflict Minerals Declaration**

### Slip Rings

"Conflict minerals" are defined by the Securities and Exchange Commission (SEC) as cassiterite, columbitetantalite, wolframite, and gold, and their derivatives, which are limited to tin, tantalum and tungsten (also known as 3TG).

*"DRC Conflict-free"* minerals are those that do not directly or indirectly benefit armed groups from Conflict-Affected and High-Risk Areas *("CAHRA"*), including the Democratic Republic of the Congo ("DRC"), the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and/or Angola.

Section 1502 of the *Dodd-Frank Financial Reform & Consumer Protection Act ("Dodd-Frank Act")* requires public companies in the U.S. to disclose their use of tin, tungsten, tantalum and gold (3TGs) in their products and determine if they are *"DRC conflict-free"*.

*Regulation (EU) 2017/821* of the European Parliament and of the Council of 17 May 2017 laying down supply chain *due diligence* obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from *CAHRA*.

Ravioli Spa hereby declares:

- we are not importer as defined by Regulation (EU) 2017/821;
- we are not a U.S. stock company;
- Among the 3TG metals only tin (used for solder wire and in copper alloys) and gold (used for surface treatments) are intentionally added during the manufacturing process of RAVIOLI S.p.A. Slip Rings;
- gold and tin are purchased from companies estabilished in the EU, which are therefore subjected to the same due diligence obligations;
- we voluntarily fulfills due diligence obligations by asking our suppliers to fully comply with conflict minerals regulations.

Yours sincerely

Ing. Roberto Orlandi QUALITY ASSURANCE





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# TSCA Compliance Declaration Section 6(h) & Section 8(a)(7)

#### Slip Rings

The Toxic Substances Control Act (TSCA) of 1976 grants the U.S. Environmental Protection Agency (EPA) the authority to require reporting, recordkeeping, testing, and to impose restrictions related to chemical substances and/or mixtures.

On January 6, 2021, the EPA completed risk evaluations and established a new regulatory management program for five persistent, bioaccumulative, and toxic (PBT) chemical substances. As a result, the EPA issued five final rules limiting or prohibiting the manufacture (including import), processing, and/or distribution in commerce (including within articles) of the following PBT chemicals:

- Decabromodiphenyl ether (DecaBDE)
- Phenol, Isopropylated Phosphate 3:1 (PIP 3:1)
- 2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP)
- Hexachlorobutadiene (HCBD)
- Pentachlorothiophenol (PCTP)

Furthermore, on October 11, 2023, the EPA published the final rule under TSCA Section 8(a)(7), establishing reporting and recordkeeping requirements for Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS).

To the best of our knowledge, and based on information provided by our raw material and component suppliers, Ravioli S.p.A. hereby declares that:

- The products and articles we supply do not contain any of the five PBT substances listed under TSCA Section 6(h);
- The products do not contain any intentionally added PFAS, nor are they manufactured with PFAS, as defined by the EPA under TSCA Section 8(a)(7);
- None of these substances are intentionally added or used during the manufacturing process.

This declaration is based on information provided by our suppliers of raw materials and/or components used in the production of our goods.

This declaration is issued in good faith and based on current data and supplier declarations available as of the date indicated.

Yours sincerely

Ing. Roberto Orlandi QUALITY ASSURANCE