

Product Stewardship and Regulatory Compliance - REACH Statement 2025

At HD MicroSystems L.L.C. (HD MicroSystems), Product Stewardship and Regulatory Compliance is an important aspect of our supply chain relationships. We maintain an unwavering commitment to the safety of our employees, vendors, customers, and the communities in which we operate. As part of that effort, HD MicroSystems has established a European team to address the new regulations and requirements of the European Union (EU) as they apply to our products. We would like to update you as to the status of several of these initiatives.

HD MicroSystems is making certain that our products are in compliance with the EU's REACH legislation. Under this regulation, we were obligated to register the solvent N-Methylpyrrolidone (NMP, CAS No. 872-50-4) by the end of 2010. NMP is the base solvent in many of our products.

We completed that registration in September 2010 and the registration number is 01-2119472430-46-0004. With that step, HD MicroSystems has secured the availability of the affected products to Europe and assured continuous supply to our customers. Additional registrations were completed before the required dates in 2013 and 2018, as well as potential actions to authorise the appropriate usage and/or products, as mixtures with NMP, according to REACH .

As required by Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP), we have modified the “P- and H-phrases” on our safety data sheets (SDSs) and labels for our products VM-651, PA-400R and PA-401D. All of our remaining products are classified as preparations under the CLP regulations and all labels and SDSs have already been updated since June 2015, as required.

In addition, we have updated the hazard classification on the labels and SDSs for our NMP-based products. The key change is the addition of the phrase “R61- May cause harm to the unborn child”. All affected SDS are available on request.

If you have any questions, please contact the European HD MicroSystems REACH Coordinator, Michael Knaus (Michael.Knaus@hdmicrosystems.com) or HD MicroSystems Regulatory and Compliance Manager, Patricia M. Bartlett (Patricia.M.Bartlett@hdmicrosystems.com).

To understand fully the obligations that you will have under REACH, we recommend that you consult the REACH web site at <http://echa.europa.eu>.

ADDITIONAL INFORMATION

- RBA Conflict Minerals and Extended Minerals Supplier Response

- 1) http://echa.europa.eu/chem_data/candidate_list_table_en.asp
- 2) Disclaimer: This information is based on our current level of knowledge and expresses only our intention. It does not constitute a binding obligation. Whilst the information is provided in good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information. As we cannot be aware of all aspects of your business and the impact REACH may have on your company, we strongly encourage you to get familiar with REACH, its requirements and timelines. HD MicroSystems has no intention to change its product portfolio due to the introduction of REACH, provided that REACH does not impose such a commercial or technical burden that it would impact the health of our business. However, since HD MicroSystems is dependent also on its suppliers HD MicroSystems may be forced to discontinue products as a result of a decision taken by such suppliers. Based on industry assessments, it is likely that a certain number of chemicals will no longer be available on the European market. This may necessitate product reformulation, and subsequent product / article re-qualification, or, in more critical cases, a complete product change.