

General Supplier Declaration (GLE)

Information on product compliance

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1 Introduction

Optec AG is committed to ensuring that all relevant international legislation, customer requirements, standards and the latest technology are taken into account in the manufacture of product conformity.

We monitor changes to regulations and take them into account promptly in the affected product life cycle phases. We proceed as follows:

- Our suppliers guarantee compliance with the statutory regulations and official requirements applicable to the contractual products, in particular with regard to environmental and safety requirements.
- Delivered parts are subjected by our suppliers to an appropriate quality control in terms of type and scope by means of random sampling.
- Quality assurance measures are initiated immediately in the event of abnormal analysis results.
- Products within the scope of one or more EU CE marking directives receive a CE marking and a uniform declaration of conformity.

As there more and more inquiries about requirements, we would like to provide an overview of the most common topics and the information we provide on them below.

We ask for your understanding that cannot answer all questions at this .

If your question not answered, please get in touch with your sales contact at Optec AG.

2 Physical and technical aspects

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

To guarantee the technical requirements for product safety, EMC, radio and measuring devices, Optec AG applies a protection target-oriented methodology.

At this point, we give the highest priority to the protection of life and limb.

Every effort is made to ensure that our products do not cause any personal injury, environmental damage or damage to property.

2.2 CE marking

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

The abbreviations in the titles stand for the following guidelines:

Acronym	Directive designation	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 you on the manufacturer websites of the respective product families.

3 Chemical law aspects (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, Authorization and Restriction of .

As a manufacturer of electronic products, Optec AG acts in the role of a "downstream user" within the meaning of REACH.

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

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

The regular amendments and additions to REACH Annexes XIV, XVII and the announcements of new candidate substances (SVHCs) are continuously monitored by our suppliers/manufacturers.

SVHC are chemical substances that properties of very high concern. This means that they can:

- cause serious and irreversible damage to human health and/or
- damage ecosystems in such a way that their structure and functionality are disrupted in the long term.

Optec AG and its suppliers/manufacturers always take into account the current SVHC candidate list of the EU Chemicals Agency ECHA: <https://echa.europa.eu/de/home>.

If we have information on SVHC in Bender products, this has been reported to ECHA and can be retrieved by querying the Bender part number: <https://echa.europa.eu/de/scip-database>.

ECHA is responsible for the availability and linking of the data provided by our suppliers/manufacturers in the SCIP database.

Optec AG has no influence on this.

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 appliances and electronic components.

When providing information on 2011/65/EU, the extended scopes (e.g. cables), the associated CE marking, the expiry dates of exemptions and the additional substance bans according to the delegated version (EU) 2015/863 are taken into account.

Due to the current supply chain situation, we and our suppliers/manufacturers are required to take into account the application of the valid exemptions of Annex III and IV from 2011/65/EU in our EU RoHS-compliant labeling.

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

All new devices are designed to be lead-free wherever possible, depending on the application. Older devices will only be converted to low-lead or lead-free according to requirements and proportionality.

Products that fall directly within the scope of the EU RoHS are provided with a CE marking.

EU-RoHS-compliant products receive an EU Declaration of Conformity, which you will find linked to the respective product family on the manufacturer's website in the download area.

If you require detailed information on the RoHS exemptions applied to our products, please contact us at info@optec.ch.

Ensuring RoHS compliance has a long tradition at Optec AG, as the first RoHS-compliant device left the production line of our supplier/manufacturer Bender GmbH back in 2005.

3.2.2 Halogen-free

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

Many halogens and halogen compounds have long been regulated by law, e.g. under EU POPs, US TSCA or as harmful greenhouse gases.

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

IEC 61249-2-21, for example, is used for PCB production.

This standard requires that printed circuit boards must not contain more than a total of 1,500 ppm of halogens.

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

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

The halogen chlorine can also be contained, for example, in terminals, cables, cable assemblies, heat-shrink tubing and wires.

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

3.3 POP

3.3.1 EU-POP, PFAS

The second POP Regulation (EU) 2019/1021 currently applies in the EU in implementation of the 2001 Stockholm Convention.

It regulates the ban on persistent organic pollutants because they remain in the environment for a long time without decaying on their own, accumulate in the food chain and cause damage to human health and the environment.

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

We currently have no information that products from our suppliers/manufacturers contain persistent organic pollutants or PFAS or that such substances are used or applied in production processes.

3.4 Conflict minerals

Optec AG is a privately held company and is not currently subject to the legal regulations on conflict minerals.

Nevertheless, we and our suppliers/manufacturers are aware of our social responsibility and stand behind the regulatory goal of preventing the possibility of financing armed groups through the extraction and trade of mineral raw materials and curbing the associated human rights violations.

Conflict minerals could only be contained in our products, if at all, in an already processed form.

Due to the complexity of the supply chains and the distance of material procurement, clear traceability back to the smelter is not possible.

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

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

4 Eco-efficiency, circular economy, waste

4.1 Devices

At present, the appliances developed and manufactured by our suppliers/manufacturers are not subject to any statutory ecodesign requirements of which we are aware.

In accordance with the quality policy of our suppliers/manufacturers, we take into account the latest scientific and technical findings in order to be able to offer our customers the most efficient and environmentally friendly appliances possible.

4.2 Batteries

Some of the products we sell are equipped with long-life device batteries. These are neither manufactured by us nor by our suppliers/manufacturers.

When procuring, our suppliers/manufacturers pay attention to the applicable legal and normative requirements and, in particular, take into account the new legal framework envisaged by EU policy, which aims to make batteries more sustainable, circular and safer than before from 2024.

4.3 Packaging

4.3.1 Switzerland, EU and EU member states

As Switzerland is not a member of the European Union, the EU regulations on packaging are not for our country. Nevertheless, the authorities are endeavouring to harmonize the national regulations with the EU rules in the interests of an unhindered exchange of goods with other countries. Swiss legislation, in contrast to that of neighboring countries aims not directly on all packaging: a There is no general packaging ordinance in this country, and none is planned. However, there are regulations concerning certain types or properties of packaging (see <https://www.bafu.admin.ch/bafu/de/home/themen/abfall/abfallwegweiser-a-z/verpackungen.html#:~:q=78822579>)

4.4 Waste

4.4.1 Electrical and electronic devices

Retailers, manufacturers and importers are obliged to take back disused electrical and electronic appliances in their product range free of charge.

4.4.2 Disposal/recycling

Electrical and electronic appliances are classified as "other controlled waste" in accordance with the Ordinance on the Movement of Waste (VeVA - <https://www.veva-online.admin.ch/veva/start.cmd>).

Disposal companies in Switzerland that accept appliances require a permit from the canton in which they are located. The export and import of such waste requires a permit from the FOEN. Exports to countries that are not members of the OECD or the EU are prohibited.

5 Environment & Human Rights

Switzerland is part of international agreements that promote human rights and sustainability.

5.1 Environmental legislation

Switzerland has comprehensive environmental legislation that also affects SMEs such as Optec AG:

- Environmental Protection Act (EPA): Companies are obliged to minimize environmental pollution and comply with legal limits (e.g. emissions, waste disposal).
- CO₂ Act: Companies that are particularly energy-intensive must measures to reduce CO₂ emissions. However, there are funding programs that support SMEs in becoming more climate-friendly.

5.2 Labor law and human rights

Optec AG is committed to respecting fundamental labor rights as laid down in international agreements such as the core labor standards of the ILO (International Labor Organization):

- No child or forced labor.
- Equal pay for work of equal value.
- Safe and fair working conditions.

Wetzikon, February 1, 2025

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