

RoHS, REACH & Conflict Minerals – Compliance & Commitment

RoHS – Restriction of Hazardous Substances Directive (2011/65/EU and 2015/863/EU)

The company complies with the requirements of the RoHS Directive 2011/65/EU, as amended by Directive 2015/863/EU, which restricts the use of hazardous substances in electrical and electronic equipment.

This regulation applies to all relevant products placed on the EU market after July 1, 2006, with the goal of protecting human health and the environment by reducing the generation of hazardous waste.

The following substances are limited to maximum concentration values in homogeneous materials:

- Lead (Pb) – 0.1%
- Mercury (Hg) – 0.1%
- Cadmium (Cd) – 0.01%
- Hexavalent Chromium (Cr⁶⁺) – 0.1%
- Polybrominated Biphenyls (PBB) – 0.1%
- Polybrominated Diphenyl Ethers (PBDE) – 0.1%
- Bis(2-ethylhexyl) phthalate (DEHP) – 0.1%
- Butylbenzyl phthalate (BBP) – 0.1%
- Dibutyl phthalate (DBP) – 0.1%
- Diisobutyl phthalate (DIBP) – 0.1%

The company has implemented internal controls across its procurement, design, and manufacturing processes to ensure compliance with RoHS requirements. We work closely with our suppliers through binding agreements, rigorous material controls, and continuous quality validation to ensure that restricted substances are either eliminated or fall within legally permitted limits.

We guarantee that all products marketed within the European Union meet the requirements of the RoHS Directive and all applicable laws, as part of our broader commitment to environmental responsibility and product excellence.

REACH – Registration, Evaluation, Authorisation and Restriction of Chemicals (Regulation (EC) No 1907/2006) and SCIP – Substances of Concern In articles as such or in complex objects (Products) (Waste Framework Directive 2008/98/EC)

The European Union chemicals policy REACH entered into force on June 1, 2007. REACH aims to improve the protection of human health and the environment from risks posed by chemical substances. The regulation places the responsibility on manufacturers and importers to understand and manage the risks associated with chemicals throughout their entire life cycle.

Under REACH, substances manufactured or imported in the EU in quantities exceeding 1 tonne per year per legal entity must be registered with the European Chemicals Agency (ECHA), provided that the substance is intended to be released under normal or reasonably foreseeable conditions of use.

Our products are not designed to intentionally release substances under normal conditions of use, nor do we manufacture or import substances in excess of 1 tonne per year. Therefore, we are not subject to REACH registration requirements and is compliant with the relevant provisions.

In accordance with Article 7(2) of REACH, if a Substance of Very High Concern (SVHC) included in the ECHA Candidate List is present in an article in a concentration greater than 0.1% w/w, and the total quantity exceeds 1 tonne/year, a notification to ECHA is required unless exemptions apply. This obligation became effective in June 2011. Where applicable, the company takes all necessary steps to ensure compliance with this requirement.

In line with Article 33 of REACH, the company also ensures that, when SVHCs are present above 0.1% w/w in any article, downstream users and consumers are properly informed to enable safe use of the product.

Furthermore, the company is fully compliant with the SCIP (Substances of Concern In articles as such or in complex objects (Products)) database requirements, established under the Waste Framework Directive.

As of January 5, 2021, companies placing articles containing SVHCs above 0.1% w/w on the EU market are required to submit information to the SCIP database managed by ECHA. This ensures transparency regarding hazardous substances throughout the entire lifecycle of products, including the waste phase. The company actively contributes to this system, ensuring that the required data is submitted and accessible to waste operators and consumers.

REACH also includes additional obligations:

- Annex XIV: List of substances requiring prior authorisation for use.
- Annex XVII: List of restrictions on manufacture, placing on the market, and use of certain dangerous substances, mixtures, and articles.

These annexes are regularly updated. The company actively monitors and evaluates updates to these lists and assesses our suppliers' use of SVHCs to maintain ongoing compliance.

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Conflict Minerals – Dodd-Frank Act Compliance

Armed groups operating in the Democratic Republic of the Congo (DRC) and surrounding regions are known to control a significant number of mining sites. These groups have been associated with severe human rights violations, including terrorism, murder, and the use of forced labor.

Minerals extracted from such mines, specifically Gold (Au), Tin (Sn), Tantalum (Ta), and Tungsten (W), are referred to as Conflict Minerals, as their trade finances the continued activity of these armed groups.

In an effort to disrupt the financial support of such groups, the Dodd-Frank Wall Street Reform and Consumer Protection Act was enacted in the United States. This law requires U.S. publicly traded companies to perform due diligence and file reports with the Securities and Exchange Commission (SEC) regarding the origin and use of Conflict Minerals in their products.

Although we are not a U.S. publicly traded company and therefore not legally required to comply with the Dodd-Frank Act, we fully support the global initiative to eliminate the use of Conflict Minerals that finance violence and exploitation.

The company has proactively engaged with its supply chain to address this issue, requesting documentation and certifications based on the Responsible Minerals Initiative (RMI, formerly EICC-GeSI) framework. All collected declarations are constantly under review.

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