GLOBAL PFAS COMPLIANCE DECLARATION OF CONFORMITY

EPA TSCA (USA) ▪ State Regulations (Minnesota, New Mexico) ▪ Japan CSCL

U.S. Environmental Protection Agency (EPA) Toxic Substances Control Act (TSCA)
Section 6(a), Section 6(h) and Section 8(a)(7) PFAS Reporting and Recordkeeping
Minnesota Statute Section 116.943 (Amara's Law) PFAS in Products
New Mexico PFAS Protection Act (House Bill 212)
Japan Chemical Substance Control Law (CSCL) PFAS Restriction

1. Product Scope

This declaration applies to the following WIBU-SYSTEMS hardware products:

- Product Type: **WibuKey and CodeMeter-Stick/-Card/-ASIC**
- Product Series: **all WibuBox, CmStick, CmCard, CmASIC Dongles**
- Part Number: **all Hardware-Types**

2. Federal EPA TSCA Compliance (United States)

a) TSCA Section 6(h) – Persistent, Bioaccumulative, and Toxic Substances

Applicable Regulation:
Environmental Protection Agency (EPA), published January 6, 2021

Restricted Substances:

- Decabromodiphenyl Ether (DecaBDE), CAS-No. 1163-19-5
- Hexachlorobutadiene (HCBD), CAS-No. 87-68-3
- Phenol, Isopropylated Phosphate (3:1) (PIP 3:1), CAS-No. 68937-41-7
- Pentachlorothiophenol (PCTP), CAS-No. 133-49-3
- 2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP), CAS-No. 732-26-3

Manufacturer Declaration:
WIBU-SYSTEMS AG does not use, intentionally add, nor distribute any prohibited PBT chemicals listed above.

b) TSCA Section 6(a) – Chlorinated Solvents

Applicable Regulation:
Environmental Protection Agency (EPA), published December 18, 2024

Restricted Substances:

- Trichloroethylene (TCE), CAS-No. 79-01-6
- Perchloroethylene (PCE), CAS-No. 127-18-4
- Carbon Tetrachloride (CTC), CAS-No. 56-23-5

Manufacturer Declaration:
WIBU-SYSTEMS AG does not use, intentionally add, nor distribute any prohibited chlorinated solvents listed above.

WIBU-SYSTEMS AG reserves the right to change products or specifications without any notice.

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c) TSCA Section 8(a)(7) – PFAS Reporting and Recordkeeping

Applicable Regulation:
Environmental Protection Agency (EPA), published September 28, 2023

Scope:
Reporting requirement for manufacturers of per- and polyfluoroalkyl substances (PFAS) as defined in TSCA Section 3(2) and
40 C.F.R. Section 705.3

Manufacturer Declaration:
WIBU-SYSTEMS AG is not a producer, manufacturer, or importer of PFAS-containing substances. The hardware products manufactured by WIBU-SYSTEMS AG do not contain chemical substances as defined in TSCA Section 3(2) that fall within the structural definition in 40 C.F.R. Section 705.3. Therefore, PFAS reporting under TSCA Section 8(a)(7) does not apply.

3. Regional PFAS Compliance

a) Minnesota (USA) – Statute Section 116.943 (Amara's Law)

Applicable Regulation:

- Minnesota Statute Section 116.943, enacted May 2023
- Minnesota Pollution Control Agency (MPCA) Rules (finalized December 8, 2025)

Reporting Deadline:
July 1, 2026 (initial report); annually thereafter by February 1

Scope:
Manufacturers of products containing intentionally added PFAS that are sold, offered for sale, or distributed in Minnesota must submit detailed product and chemical information to the MPCA.

Manufacturer Declaration:
WIBU-SYSTEMS AG confirms that the hardware products listed in Section 1 that are sold, offered for sale, or distributed in the State of Minnesota:

- Do NOT contain intentionally added PFAS as defined by Minnesota Statute Section 116.943 and Minnesota Rules
  Chapter 9184
- Do not contain per- and polyfluoroalkyl substances (PFAS) meeting the structural definition in Minnesota regulations

Reporting Status:
Based on the absence of intentionally added PFAS, reporting requirements under Minnesota Statute Section 116.943 do **NOT** apply to these products.

Supporting Evidence:
This declaration is based on Full Material Substance Declarations (FMD) according to IPC-1752 standard, provided by materials suppliers and verified through SGS testing reports for composite materials.

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b) New Mexico (USA) – PFAS Protection Act (House Bill 212)

Applicable Regulation:

- New Mexico PFAS Protection Act (HB 212), signed into law April 8, 2025
- Implementation by New Mexico Environment Department (NMED) and Environmental Improvement Board (EIB)

Effective Date:
January 1, 2027 (reporting and labeling requirements)

Scope:
Manufacturers of products containing intentionally added PFAS that are sold, offered for sale, or distributed in New Mexico must:

- Submit detailed product and chemical information to NMED
- Label products with specified PFAS content notifications (using NMED-provided words and symbols)

Manufacturer Declaration:
WIBU-SYSTEMS AG confirms that the hardware products listed in Section 1 that are sold, offered for sale, or distributed in the State of New Mexico:

- Do NOT contain intentionally added PFAS as defined by the New Mexico PFAS Protection Act (HB 212)
- Do not contain per- and polyfluoroalkyl substances (PFAS) meeting the structural definition under NMED regulations

Compliance Status:
Based on the absence of intentionally added PFAS:

- Reporting requirements (effective January 1, 2027) do **NOT** apply
- Product labeling requirements (effective January 1, 2027) do **NOT** apply

Supporting Evidence:
This declaration is based on Full Material Substance Declarations (FMD) according to IPC-1752 standard, provided by materials suppliers and verified through SGS testing reports for composite materials.

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c) Japan – Chemical Substance Control Law (CSCL) PFAS Restriction

Applicable Regulation:

- Japanese Chemical Substance Control Law (CSCL), Class I Specified Chemical Substances
- Jointly issued by Ministry of Health, Labour and Welfare (MHLW), Ministry of Economy, Trade and Industry (METI), and Ministry of the Environment (MOE)

Effective Date:
January 10, 2025 (currently in force)

Scope:
Prohibition of manufacture, import, and use of 138 specified PFAS chemicals under CSCL. This restriction applies to all products containing these PFAS that are manufactured, imported, or sold in Japan.
Covered Substances: 138 per- and polyfluoroalkyl substances (PFAS) designated as Class I Specified Chemical Substances under CSCL, including but not limited to:

- Perfluorooctanoic acid (PFOA) and related compounds
- Perfluorooctane sulfonic acid (PFOS) and related compounds
- Perfluorohexane sulfonic acid (PFHxS) and related compounds
- Perfluorononanoic acid (PFNA) and related compounds
- And 134 additional specified PFAS chemicals

Manufacturer Declaration:
WIBU-SYSTEMS AG confirms that the hardware products listed in Section 1 that are manufactured, imported, or sold in Japan:

- Do **NOT** contain any of the 138 PFAS chemicals designated as Class I Specified Chemical Substances under Japanese CSCL
- Do **NOT** contain per- and polyfluoroalkyl substances (PFAS) prohibited under the CSCL regulation effective January 10, 2025

Compliance Status:
COMPLIANT. The products are in full compliance with Japanese CSCL PFAS restrictions and can be legally manufactured, imported, and sold in Japan.

Supporting Evidence:
This declaration is based on comprehensive material analysis according to IPC-1752 standard, supplier declarations covering all 138 CSCL-listed PFAS, and third-party laboratory verification (SGS reports) confirming the absence of regulated PFAS chemicals.

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4. Documentation and Supporting Evidence

This comprehensive declaration is based on:

- Full Material Substance Declarations (FMD) according to IPC-1752 standard provided by all materials suppliers
- SGS analytical testing reports for composite materials and components
- Manufacturer certifications from assembly partners
- Component specifications and Material Safety Data Sheets
- Supply chain due diligence in accordance with ISO 14001 environmental management principles
- CSCL-specific screening against all 138 Japanese-regulated PFAS chemicals

WIBU-SYSTEMS AG can provide objective evidence and supporting documentation upon request, including:

- Complete supplier declarations on PFAS content
- Detailed material composition analysis (IPC-1752 compliant)
- Component-level analytical screening results
- Third-party laboratory component test reports (SGS)

Important Note:
This information on WIBU-SYSTEMS AG products is based upon the information provided by the materials suppliers and assembly manufacturers used by WIBU-SYSTEMS AG to manufacture these products. As such, WIBU-SYSTEMS AG makes no independent representations or warranties, expressed or implied, and assumes no liability in connection with the use of this information.

5. Manufacturer Information

This declaration is made on behalf of the manufacturer:

WIBU-SYSTEMS AG, Zimmerstrasse 5, 76137 Karlsruhe, Germany

Please do not hesitate to contact us should you have any questions. We will be happy to share our expertise and data with you.

WIBU-SYSTEMS AG, April 14, 2026



i.A. Remo Albrecht
Head of Quality Management

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