



664 Danbury Rd  
Ridgefield, CT 06877

Declaration of Conformity to EU RoHS

Products listed below (or attached to this letter ) that are manufactured by Ullman Devices are in compliance with Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (also known as “RoHS Recast”). In addition, this declaration of conformity is issued under the sole responsibility of Ullman Devices. Specifically, products manufactured do not contain the substances listed in the table below in concentrations greater than the listed maximum limit.

On June 4, 2015, the European Delegated Directive (EU) 2015/863 added *four new substances* to the EU RoHS Directive. The restrictions for these additional substances enter into force on *July 22, 2019* for all electrical and electronic equipment (EEE) excepting Category 8 and Category 9 products. Category 8 and Category 9 products must comply by July 22, 2021.

Substance	Maximum Limit (ppm)
Lead (Pb)	1000
Cadmium (Cd)	100
Mercury (Hg)	1000
Hexavalent Chromium (Cr6+)	1000
Poly Brominated Biphenyls (PBB)	1000
Poly Brominated Diphenyl ethers (PBDE)	1000
<i>Bis(2-ethylhexyl) phthalate (DEHP)</i> (CAS: 117-81-7)	1000
<i>Benzyl butyl phthalate (BBP)</i> (CAS: 85-68-7)	1000
<i>Dibutyl phthalate (DBP)</i> (CAS: 84-74-2)	1000
<i>Diisobutyl phthalate (DIBP)</i> (CAS: 84-69-5)	1000

Exemptions: *NOTE: List any RoHS exemptions claimed for any parts or materials covered by this DoC.*

Product Identification:

*NOTE: Use one or more of these choices:*

- Discrete part numbers
- Part family descriptions
- Part number series
- “All parts manufactured by <manufacturer name>.”
- Date codes or other identification, when not all versions of the part may be compliant.

Date of Issue: July 22, 2022  
Signature: *Michael Fox*  
Title: Director-Consultant  
Telephone: 423-956-2900  
Email: [mfox@aertn.com](mailto:mfox@aertn.com)

Place of Issue: Ullman Devices  
Name (printed): Michael Fox



July 28, 2022

EU RoHS 3/REACH  
Information request

To Whom It May Concern,

Ullman Devices manufactures and assembles a variety of tools and accessories for distribution. These tools and accessories are supplied to many customers.

Restriction of Hazardous Substances (RoHS) compliance is utilized to improve the protection of human health and the environment from the risks posed by certain chemicals. These chemicals are considered to be Substances of Very High Concern (SVHC) for the European Union (EU).

RoHS 3 (EU Directive 2015/863) added Category 11 (catch-all) products and adds four new restricted substances - all phthalates. The four phthalates are mainly used as insulation plasticizers, and are on the list of Substances of Very High Concern (SVHC).

Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) for the European Chemicals Agency (ECHA), compliance is utilized to improve the protection of human health and the environment from the risks posed by certain chemicals. These chemicals are considered to be SVHCs for the European Union.

The parts listed below are recognized under this information request:

- **Product #C-2 2-1/4" Round Telescoping Inspection Mirror, Extends from 10-1/8" to 14-1/8"**

To show that the Ullman Devices manufacturing businesses comply with the Restriction of Hazardous Substances (RoHS) and Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) the following applies:

- Ullman Devices Corporation does not manufacturer or otherwise use chemicals that are listed in the EU RoHS 3 list of materials.
- Ullman Devices does not manufacturer or otherwise use chemicals that are listed in the European Chemicals Agency ECHA list of 224 SVHCs released in June 2022.

Ullman Devices Corporation continues to manufacture quality products while adhering to environmental compliance through RoHS/REACH.

Should you have any questions in regard to this notification, please contact me by email at [mfox@aertn.com](mailto:mfox@aertn.com).

Sincerely,

*Michael Fox*

Michael Fox  
Director-EHS Services/Consultant  
Appalachian Environmental Resources, Inc.