



REACH/ (China-)RoHS/California Prop65/ELV/TSCA/CMRT-declaration

Declaration about the “guideline 2011/65/EU of the European Parliament and of the European Council of 08 June 2011 on the restriction of using certain hazardous substances in electrical and electronic equipment,” last amended by the delegated directive 2017/2012 from 15 Nov. 2017.

The products manufactured by Isabellenhütte Heusler GmbH & Co. KG do not fall under this directive according to annex 1 of the directive 2011/65/EU and annex 2 of the directive 2015/863/EU (except for no. 9 “Monitoring and control instruments, including monitoring and control instruments in industry”), but they are largely used in such applications. From the current point of view, it can be confirmed that all products of Isabellenhütte correspond to the directive 2011/65/EU and directive 2015/863/EU and that they do not contain substances above the limit values specified in the directive (except for products for space applications). Furthermore, no exceptions apply according to the annexes III or IV of the directive. This applies equally for the substances restricted in their use according to China-RoHS.

The same applies to the information obligations according to article 33 of the ordinance (EC) no. 1907/2006 of the European Parliament and of the European Council from 18 December 2006 regarding the registration, evaluation, authorization and restriction of chemical substances (REACH), published on 30 December 2006 in the EU official gazette 396/1 (as of: 11 Jan. 2018). Isabellenhütte Heusler GmbH & Co. KG sees itself as a downstream user or supplier of products in the sense of the ordinance. After detailed checks of the candidate list (as of: 4th February 2026), Annex XIV, Annex XV and Annex XVII in its newest version, it can be determined that there are currently no substances above the limit of 0.1% by mass in the products of Isabellenhütte Heusler GmbH & Co. KG.

The California "Safe Drinking Water and Toxic Enforcement Act" of 1986, published in the "California Health & Safety Code Section 25249.6," is referred to as "California Proposition 65", or "CP65" for short. The Proposition 65 list (published by OEHHA - as of *December 8th, 2025*) contains around 1000 substances that have been declared as carcinogenic, mutagenic or hereditary (CMR) in the state of California. Isabellenhütte confirms compliance with the specifications of this list by comparing and testing the substances used. The specified limit values have been complied with.



The Toxic Substances Control Act 1976 (TSCA) is a US law that was passed in 1976 and is administered by the United States Environmental Protection Agency (EPA). The TSCA is an inventory of chemicals currently used in the US market.

Isabellenhütte Heusler GmbH & Co. KG sees itself as a downstream user or supplier of products within the meaning of US law. After detailed checks of the bans (as of December, 2025) it can be determined that there are currently no substances in the products of Isabellenhütte Heusler GmbH & Co. KG.

The international material data system IMDS (www.mdsystem.com) is used to ensure transparency. This complies with the high standards of the automotive industry and ensures that the requirements of the End of Life Vehicles Directive (ELV directive 2000/53/EC) are met. This tool is used to verify the compliance of all materials used by suppliers that remain in our products. In addition, this instrument covers all globally applicable legal regulations regarding substance restrictions (see GADSL – Global Automotive Declarable Substance List).

Our information about conflict materials is available by request (according to CFSI – CMRT template).

Isabellenhütte Heusler
GmbH & Co. KG

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Environmental Management

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