

Munich, 27.11.2025

Material Declaration of Compliance (M-DoC)

- European DIRECTIVE 2011/65/EU (**RoHS II**)
- Chinese MIIT Order 32 (**China-RoHS 2**)
- European **REACH** REGULATION (EC)1907/2006
- European **POP** REGULATION (EU) 2019/1021
- U.S. EPA **TSCA** Section 6(h) - **PBTs**
- U.S. EPA **TSCA** Section 8(a)(7) – **PFAS**
- **California Proposition 65** (Safe Drinking Water and Toxic Enforcement Act of 1986)
- PULS Statement regarding requirement "**Asbestos-Free**" devices
- PULS Statement regarding requirement "**Halogen-Free**" devices
- Free of paint wetting impairment substances (**LABS**) in accordance to VDMA 24364
- European REGULATION (EU) 2025/40 on packaging and packaging waste (**PPWR**) and Commission DECISION 97/129/EC on packaging identification

PULS Sales-number / Model Designation
PIRD20.241

European DIRECTIVE 2011/65/EU (RoHS II)

The declared device meets regulations regarding the restriction in the use of certain hazardous substances in electrical and electronic equipment according the DIRECTIVE 2011/65/EU (RoHS II) amended by DIRECTIVE (EU) 2017/2102.

The RoHS II conformity of the declared device has been in effect since the date of market launch and at the earliest when DIRECTIVE 2011/65/EU come into force.

The declared device meets the restricted substances referred to in Article 4 (1) and maximum concentration values by weight of homogeneous materials according to Annex II.

Annex II to the Directive 2011/65/EU was amended by DIRECTIVE (EU) 2015/863. PULS confirms compliance with these additional substance restrictions.

Applications exempted from the restriction in Article 4(1) according to Annex III are:

none

Note: The technical documentation as proof of compliance with the applicable RoHS DIRECTIVE 2011/65/EU is given in accordance with *EN IEC 63000:2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances)*.

Chinese MIIT Order 32 (China-RoHS 2)

The declared device meets the Measures for Restriction of the Use of Hazardous Substances in Electrical & Electronic Products Order No. 32 (China-RoHS II) of the Chinese Ministry of Industry and Information Technology (MIIT).

Toxic or Hazardous substances contained in all of the homogeneous materials for the declared device are within the limit requirement in GB/T 26572.

The declared device is marked with following symbol:

The product does not contain any dangerous substance and can be recycled.



European REACH Regulation (EC) 1907/2006

As a manufacturer of electronic power supplies, PULS GmbH is a "downstream user" with regards to the Regulation for the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). Therefore, PULS is providing information only on non-chemical articles (products). In principle, PULS GmbH is not subject to any obligation to register or to compile material safety data sheets.

PULS hereby confirms that its electronic power supplies comply with the legal obligations regarding Article 33 and the restrictions outlined in Annex XVII of the European REACH Regulation 1907/2006 which came into force on 01.06.2007.

PULS and its suppliers will continuously review the actual ECHA "Candidate List" for additions and updates and act accordingly in compliance with REACH regulations. The actual candidate list is provided on the European Chemicals Agency website at:

<https://echa.europa.eu/candidate-list-table>

The information requirement of REACH Article 33 is met by considering the ECJ-Judgment (Case C-106/14) for calculating the SVHC content in articles.

The SVHC weight calculation is done in recommendation according to the - ECHA Guidance on requirements for substances in articles.

For the declared device there is to-date no evidence within our supply chain that our product contain articles with a substance which is listed in the ECHA "candidate list" SVHC (Article 59) with a weight of >0.1%.

Note: The technical documentation as proof of compliance with the applicable REACH Regulation 1907/2006 is given in accordance with *EN IEC 63000:2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances)*.

European POP REGULATION (EU) 2019/1021

PULS confirms compliance with Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (POP).

Based on current information and supplier declarations, the declared device does not contain any substances listed in Annex I of the POP Regulation. Furthermore, no exemptions pursuant to Article 4 of the Regulation are used in the declared device.

Note: The technical documentation demonstrating compliance with the POP Regulation (EU) 2019/1021 is compiled in accordance with EN IEC 63000:2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances).

U.S. EPA TSCA Section 6(h) - PBTs

The United States Environmental Protection Agency (EPA) requires under the Toxic Substances Control Act (TSCA) Section 6(h) restrictions and information obligation regarding the 5 PBT substances.

For the declared device there is to-date no evidence within our supply chain that our products contain articles with prohibited PBT substances listed in TSCA Section 6(h).

Note: The technical documentation as proof of compliance with the applicable TSCA Section 6(h) (USA) is given in accordance with *IEC 63000:2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances)*.

U.S. EPA TSCA Section 8(a)(7) – PFAS

PULS is not a manufacturer of substances from the PFAS substances group. Our responsibility and option for action therefore lies in analyzing the supply chains of our supply materials regarding PFAS applications.

PULS hereby confirms that it will report the PFAS substances contained in this device as soon as we have information from our supply chain. Furthermore, we confirm that we will comply with the legal reporting obligations of **U.S. EPA TSCA Section 8(a)(7)** regarding the PFAS substances contained in this device in a timely manner.

As of now, we have the following information from our supply chain about PFAS substances for the device declared here:

None (no PFAS information from supply chain)

Note: The technical documentation as proof of compliance with the applicable TSCA Section 8(a) (7) (USA) is given in accordance with *IEC 63000:2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances)*.

California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)

This PULS declared device may contain one or more substances listed under California Proposition 65 (Title 27, California Code of Regulations). As required under Proposition 65, we hereby inform our business customers (B2B) in the state of California that such substances may be present above the regulatory thresholds. In accordance with Section 25607.1 of the regulation, we provide this written notice to comply with Proposition 65 requirements for business-to-business transactions. No product labeling is required when such notice is properly communicated and acknowledged.

A current list of Proposition 65 substances can be found at: <https://www.p65warnings.ca.gov/chemicals>

The following substance(s) may be present in this product:

Substance	CAS Number	Application Context
none	none	none

These substances are encapsulated or present in solid form, and no significant exposure is expected under normal handling and use. This information is provided in good faith and based on the best available data from our suppliers.

PULS Statement regarding requirement “Asbestos-Free” devices

The **declared device is “asbestos free”** as regulated by the REACH Regulation (EC)1907/2006.

Note: The technical documentation as proof of compliance with the applicable REACH Regulation 1907/2006 is given in accordance with *EN IEC 63000:2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances)*.

PULS Statement regarding requirement “Halogen-Free” devices

Based on IEC 61249-2-21, PULS GmbH declares its devices as halogen-free if the total concentration of halogens in the device does not exceed 1500 ppm.

The halogen content of the device declared here is **less than 1500 ppm** in relation to the total weight of the device. The device will therefore be declared as - **halogen-free**.

Note: The technical documentation as proof of halogen-free compliance based on IEC 63000:2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances).

Free of paint wetting impairment substances (LABS) in accordance to VDMA 24364

The declared device is free of paint wetting impairment substances (LABS).

The investigation for substances that impair paint wetting was carried out in accordance with VDMA 24364: 2018-05. The results are shown in the table below:

Test Report	Test class	Lacquer type	Designation of the LABS conformity
LAB-21-966	C1	solvent + water based (L/W)	VDMA24364-C1-L/W

European REGULATION (EU) 2025/40 on packaging and packaging waste (PPWR) and Commission DECISION 97/129/EC on packaging identification

This compliance declaration refers exclusively to the product-specific original individual packaging materials. Other packaging materials used within the supply chain for outer packaging or repackaging purposes may

vary depending on the mode of transport or are not always under our control. They are therefore not included in the following compliance declaration.

Compliance with the Requirements of Regulation (EU) 2025/40:

- The original single packaging of the declared device complies with the essential requirements concerning composition, recyclability, reusability, and the minimization of environmental impact as defined in Regulation (EU) 2025/40.
- The concentration levels of heavy metals (lead, cadmium, mercury, and hexavalent chromium) in the packaging materials do not exceed the permitted threshold values specified in Article 5 of the Regulation.
- Measures have been implemented to support the reuse, recycling, and environmentally sound management of packaging waste in accordance with the obligations of the Regulation.

Compliance with the Requirements of Directive 97/129/EC:

- The original single packaging of the declared device is marked in accordance with the identification system for packaging materials established by Directive 97/129/EC to facilitate sorting, reuse, and recycling.
- The following table shows the packaging materials used for the original individual packaging.

Packaging part name	Material name	Packaging code	Weight (in mg)
Box inlay	PAP Corrugated fibreboard	20-PAP	355000
Installation manual	Paper	22-PAP	2700
Folding cardboard	PAP Corrugated fibreboard	20-PAP	32500

Name and address of the responsible manufacturer

PULS GmbH
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Germany

Friedrich Haunschild*

Expert Material Compliance

**The M-DoC is valid with electronical signature.*

Validity and Updates of this Material Declaration of Compliance (M-DoC)

This M-DoC reflects the latest available information from our supply chain and is based on the applicable legal requirements and substance restrictions in effect at the date of issue.

The M-DoC is reviewed regularly and updated as necessary — particularly in the event of:

- relevant changes in applicable regulations,
- additions to the candidate lists (e.g., SVHC),
- or new declarations from suppliers.

This M-DoC remains valid until a revised version is officially issued and published by PULS. It is not necessary to request updates proactively; the latest version is always made available via our official communication channels.