

EU Compliance and Responsible Sourcing Policy

1 Purpose

- 1.1** This policy establishes our commitment to ensuring that all products we design, manufacture, or distribute comply with applicable European Union (EU) regulations and directives, as well as ethical sourcing requirements. Our goal is to guarantee product safety, environmental responsibility, and social accountability throughout our supply chain.

2 EU product compliance system

2.1 Scope

This policy applies to:

- All products and components where Electrum Automation AB exercises the full product ownership i.e Electrum is the Manufacturer (this is further explained under paragraph 3).
- Process material typically not listed in the customer article list added by manufacturing process, such as printed circuit boards, solder paste, flux and coating material etcetera.
- Ensuring specification of, at the time of design, compliant materials while performing design related tasks on Manufacturer's products.

This policy does NOT apply to products and components produced or assembled on behalf of a Manufacturer.

2.2 Regulatory Framework

We adhere to the principles of the **EU product compliance system**, including:

- **Regulation (EC) No 765/2008** on accreditation and market surveillance.
- **Decision 768/2008/EC** on common framework for product legislation.
- **Regulation (EU) No 2019/1020** on market surveillance and requirements for EU-established economic operators.
- **CE marking** and **EU Declaration of Conformity** for all applicable directives.

Our products comply with all relevant EU directives and regulations, including but not limited to:

- **Low Voltage Directive (2014/35/EU)** – Electrical safety.
- **EMC Directive (2014/30/EU)** – Electromagnetic compatibility.
- **RoHS Directive (2011/65/EU)** – Restriction of hazardous substances.
- **WEEE Directive (2012/19/EU)** – Waste electrical and electronic equipment.
- **Radio Equipment Directive (2014/53/EU)** – Wireless communication.
- **ESPR (EU) 2024/1781** – Ecodesign for sustainable products.
- **ATEX Directive (2014/34/EU)** – Equipment for explosive atmospheres.

2.3 Chemical compliance

In addition to CE-related requirements, we ensure compliance with EU chemical legislation:

- **REACH Regulation (EC) No 1907/2006**, including:
 - Communication of Substances of Very High Concern (SVHC) above 0.1% w/w in articles.
 - Compliance with Annex XVII restrictions.
- **POPs Regulation (EU) 2019/1021** – Prohibition and restriction of persistent organic pollutants in substances, mixtures, and articles.

2.4 Responsible sourcing

We are committed to ethical sourcing of raw materials and compliance with:

- **EU Conflict Minerals Regulation (2017/821)** – Due diligence obligations for tin, tantalum, tungsten, and gold (3TG) sourced from conflict-affected and high-risk areas.

3 Manufacturer according to the European Commission

In accordance with Decision 768/2008/EC, further explained in the “Blue Guide”, published by the European Commission, on the implementation of EU product rules, Electrum Automation AB is not responsible for products placed on the market under another person’s or company’s trademark.

3.1 The ‘Blue Guide’ on the implementation of EU product rules 2022 (2022/C 247/01)

“The manufacturer is any natural or legal person who is responsible for designing or manufacturing a product and places it on the market under his own name or trademark.

The definition contains two cumulative conditions: the person has to manufacture (or have a product manufactured) and to market the product under his own name or trademark. So, if the product is marketed under another person’s name or trademark, this person will be considered as the manufacturer.”

4 Document history

Document revision	Description	Release date
A	Initial release	2025-10-23