

Declaration of Product Compliance

Minuteman Spring Company, Inc. • Millbury, MA • May 4, 2026

Minuteman Spring Company, Inc. provides precision custom springs and wire forms to our customers manufactured to specifications and designs dictated by the customer. Based on applicable regulations, our products meet the full definition of "articles." We do not deliver, in the form of our products or packaging, any articles that involve the intentional release of hazardous substances.

This declaration is based on information provided by our primary raw material wire suppliers — Gibbs Wire & Steel (Combined Metals Company / Gibbs Interwire) and Industrial Steel & Wire Company — both of whom have provided their own product compliance declarations. This declaration applies to springs and wire forms manufactured by Minuteman Spring and does not apply to any materials subsequently added, altered, or converted by others.

1. EU RoHS

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☒ **Comply**

☐ Do Not Comply

☐ Comply with exemption

with EU RoHS — as defined in Commission Delegated Directive (EU) 2015/863 of 31 March 2015 containing the 10 substances amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances.

RoHS guide: <https://www.rohsguide.com/>

2. EU REACH SVHC

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

listed substances at concentrations above de minimis (<0.1%) concentrations according to the most recent REACH SVHC regulatory listing of 11/6/2025 and the EC No 1272/2008 Annex VI CLP ATP20 list of candidate Substances of Very High Concern (SVHC).

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

3. EU REACH ANNEX XIV

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

listed substances at concentrations above de minimis (<0.1%) concentrations according to the most recent REACH Annex XIV list.

Authorization List: <https://echa.europa.eu/authorisation-list>

4. EU REACH ANNEX XVII

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

listed substances at concentrations above de minimis (<0.1%) concentrations according to the most recent REACH Annex XVII list.

REACH guide: <https://echa.europa.eu/regulations/reach/understanding-reach>

5. California Proposition 65

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

banned or restricted substances listed in California Proposition 65 list (last updated 1/3/2025).

Note: Many steel alloys contain Nickel; however, there is an exemption for Nickel in alloys which allows these parts to be considered compliant.

Prop 65 list: <https://oehha.ca.gov/proposition-65/proposition-65-list>

6. US TSCA — PBT Section 6(h)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

TSCA-PBT listed chemicals as per the US EPA Persistent, Bioaccumulative, and Toxic Chemicals, TSCA Section 6(h). (last updated 1/2025)

US EPA TSCA-PBT: <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/persistent-bioaccumulative-and-toxic-pbt-chemicals-under>

7. US TSCA — Chemicals Under Evaluation

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

chemical substances currently undergoing risk evaluation under TSCA Section 6(b)(4).

TSCA Risk Evaluations: <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/ongoing-and-completed-chemical-risk-evaluations-under>

8. Persistent Organic Pollutants (POP)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

listed substances in the Persistent Organic Pollutant (EU POP) regulation (EU) 2019/2021 as updated September 16, 2025, including all PFOA and PFOS restrictions listed in Annex I, II, III, and IV.

EU POP: <https://echa.europa.eu/pops-legislation>

9. Per- & Polyfluoroalkyl Substances (PFAS)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

listed Per- and Polyfluoroalkyl substances by the US EPA.

US EPA PFAS: <https://www.epa.gov/pfas>

10. Medium-Chain Chlorinated Paraffins (MCCP)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

medium-chain chlorinated paraffin compounds.

ECHA Proposal: <https://echa.europa.eu/documents/10162/2beed524-ab79-06eb-5101-15112b042f51>

11. Prior Informed Consent Regulation (PIC)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

listed substances in Annex I, Annex V or mixtures containing such chemicals in a concentration that triggers labelling obligations under the CLP Regulation (EC) No 1272/2008, per PIC regulation as of 8/31/2023.

ECHA: <https://echa.europa.eu/regulations/prior-informed-consent/understanding-pic>

12. EU Medical Device Regulation (MDR)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

listed substances in the EU MDR, Annex VI, ATP22, section 10.4.1 in any concentration.

ECHA CLP list: <https://echa.europa.eu/information-on-chemicals/annex-vi-to-clp>

13. EU Ozone Regulation

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

ozone depleting substances listed in EC #1005/2009 Annex A, B, C, D, E, F.

Montreal Protocol: <https://ozone.unep.org/treaties/montreal-protocol/montreal-protocol-substances-deplete-ozone-layer>

14. IEC 62474 Declarable Substance List (DSL)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

substances on the IAEG Declarable Substance list of 8/7/2024.

IEC 62474 database: <https://std.iec.ch/iec62474/iec62474.nsf/Index?open&q=211109>

15. IAEG Declarable Substance List (AD-DSL)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

substances on the AD-DSL list of June 2024.

AD-DSL database: <https://www.iaeg.com/chemicalrpt/addsl/>

16. Chemicals Prohibition Ordinance — ChemVerbotsV (Germany)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☒ **Comply**

☐ Do Not Comply

ChemVerbotsV Ordinance.

ChemVerbotsV: <https://www.chemical-check.com/safety-at-work/prohibited-chemicals-ordinance-chemverbotsv/>

17. AltfahrzeughG — End-of-Life Vehicle Ordinance (Germany)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☒ **Comply**

☐ Do Not Comply

AltfahrzeughG End-of-Life Vehicle Ordinance.

AltfahrzeughG: <https://www.bmu.de>

18. Battery Directive (Directive 21308/88/EC)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☒ **Comply**

☐ Do Not Comply

Battery Directive 21308/88/EC.

Batteries Directive: <https://echa.europa.eu/understanding-batteries-regulation>

19. EU Waste Framework (SCIP) — Directive 2008/98/EC

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☒ **Comply**

☐ Do Not Comply

EU Waste Framework Directive 2008/98/EC.

Waste Framework: <https://eur-lex.europa.eu/eli/dir/2008/98/oj/eng>

20. Heavy Metals Compliance — Directive 94/62/EC

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☒ **Comply**

☐ Contains but comply with thresholds & labeling

☐ Do Not Comply

Heavy Metals Packaging Waste Directive 94/62/EC.

Packaging Waste Directive: <https://eur-lex.europa.eu/eli/dir/1994/62/oj/eng>

21. Recycled Content

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☒ **Pre-Consumer Content**

☐ Post-Consumer Recycled Content

☐ Bio-based Content

22. Global Automotive Declarable Substance List (GADSL)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

substances on the Global Automotive Declarable Substance List, revised 2025.

GADSL: <https://www.gadsl.org/>

23. Emergency Planning and Community Right-to-Know Act (EPCRA)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☒ **Contain**

☐ Do Not Contain

substances on the EPCRA hazardous chemical list. A TRI Form R is submitted for each TRI-listed chemical present in our raw wire materials as required. Our wire suppliers have similarly disclosed EPCRA-listed substances in their compliance documentation.

EPCRA: <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities#q1>

24. Classification, Labelling and Packaging (CLP)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

substances with a harmonized classification of Carcinogenic, Mutagenic or Toxic to Reproduction (CMRs) category 1A or 1B, or Skin Sensitizers category 1, as listed in Annex VI Part 3 of Regulation (EC) No 1272/2008 CLP Regulation.

CLP: <https://echa.europa.eu/en/information-on-chemicals/annex-vi-to-clp>

25. European Union Directive 2011/65/EC

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

lead, mercury, chromium (VI), polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), benzyl butyl phthalate (BBP), dibutyl phthalate (DBP), diisobutyl phthalate (DIBP) at a concentration above 0.1% by weight of the homogenous material, or cadmium at a concentration above 0.01% by weight of the homogenous material.

EU Directive 2011/65/EC: <https://eur-lex.europa.eu/eli/dir/2011/65/2023-09-01>

26. EU Directive 1994/62/EC — Packaging and Packaging Waste (PPW)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

packaging containing lead, cadmium, mercury or hexavalent chromium at a concentration above 100 ppm by weight combined.

PPW: <https://eur-lex.europa.eu/eli/dir/1994/62/oj>

27. Consumer Product Safety Improvement Act (CPSIA)

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

products containing lead and/or phthalates.

CPSIA: <https://www.cpsc.gov/Regulations-Laws--Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act>

28. Canada Chemicals Management Plan 2023

Minuteman Spring Company, Inc. hereby certifies that products manufactured and sold by Minuteman Spring,

☐ Contain

☒ **Do Not Contain**

Schedule 1 substances at a concentration equal to or above 0.1% by weight.

CMP 2023: <https://canadagazette.gc.ca/rp-pr/p1/2023/2023-06-24/html/notice-avis-eng.html#na2>

For questions related to product compliance, please contact:

Authorized Signature

Title: _____

Minuteman Spring Company, Inc.

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