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To whom it may concern

Baar, 24. June 2022

**California Proposition 65** 

## **Manufacturer Statement**

California Proposition 65 (Proposition 65), officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in November 1986. Proposition 65 protects the State's drinking water sources from being contaminated with chemicals known to cause cancer, birth defects or other reproductive harm, and requires businesses to inform Californians about exposures to such chemicals prior to the exposure.

In August 2016, the California Office of Environmental Health Hazard Assessment (OEHHA) adopted extensive revisions to the Proposition 65 regulations, which set forth the method and content deemed to be clear and reasonable for Proposition 65 warnings. The warnings must be given if, in the course of doing business, a person knowingly and intentionally exposes an individual in California to a chemical known to the State to cause cancer or reproductive toxicity (such chemicals are identified on the Proposition 65 List). The new warnings are required for consumer products manufactured after August 30, 2018.

Almost all electronic components and products contain one or more chemicals included on the Proposition 65 List (such as lead, nickel alloys/plating, antimony oxide, gallium arsenide, carbon black ...). To guide businesses in determining whether a warning is necessary, OEHHA has developed over 300 regulatory safe harbor levels for Proposition 65 chemicals. A safe harbor level identifies a level of exposure to a listed chemical that does not require a Proposition 65 warning. A business is not required to provide a warning if exposure to a chemical occurs at or below these levels. These safe harbor levels consist of No Significant Risk Levels (NSRL) for chemicals listed as causing cancer and Maximum Allowable Dose Levels (MADL) for chemicals listed as causing birth defects or other reproductive harm.

Traco Electronic (TRACO) manufactures components for building into system and equipment and does not typically manufacture or market consumer products. However, the parts and components that TRACO manufactures and markets (under its TRACO POWER brand name) may be incorporated directly or indirectly into consumer electronic products (e.g., computers, white goods, ...), industrial, automotive or medical products. TRACO POWER products (like almost all electronic products) may contain one or more chemicals on the Proposition 65 list. If present, these chemicals are not intended to be exposed to users, nor are they intended to be released or discharged during normal product use.

Due to that circumstance, TRACO decided to provide warning information for all products containing substances included on the Proposition 65 list, independent of the fact that the residual risk of exposure to customers using our components (built into consumer products) is extremely low. If there is evidence of a chemical identified on the Proposition 65 list in one of our products (based on supplier material declarations or chemical testing), we advise our distributors to provide adequate warning information, if selling these products to customers in California. If more than one listed chemical is present, we identify at least one of them on the warning information, as specified in the Proposition 65 regulations.

We ask our distributors to add these warnings in online and offline sales channels in a manner so as to ensure that a Proposition 65 warning is provided prior to selling such products to consumers in California.

The following is an example of the new Proposition 65 warning for a product containing lead:

**WARNING:** This product can expose you to chemicals including lead, which is known to the State of California to cause cancer and birth defects or other reproductive harm. For more information go to <u>www.P65Warnings.ca.gov</u>

Or as its short form (in case of limited space)

**WARNING:** Cancer and Reproductive Harm - <u>www.P65Warnings.ca.gov</u>

## Additional Information for End-Use Application Manufacturers

TRACO POWER products are intended to be used as components built into end-use applications, where direct contact is not possible. Built into end-use applications, our products are not intended to expose any person to any chemical on the Proposition 65 list during normal product use. The Proposition 65 warning on Components does not automatically require the end-use application to bear a warning as well. An assessment of whether or not the end-use application requires a Proposition 65 warning must be conducted by the manufacturer of the end-use application by taking all (electronic) components and materials assembled in the end-use application into account.

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Schaffhauser Stefan, CEO