



Custom Molded Products Safety Statement

In compliance with California Proposition 65 (Prop 65), Custom Molded Products has developed a Compliance Program consisting of third-party lab testing of all related materials. The evaluation was structured to include all major applicable California Proposition 65 substances, with a focus on substances included in known California Proposition 65 examinations and applicable exposure scenarios.

CMP is pleased to provide material data sheets and supporting documentation. As part of our Compliance Program, we keep and maintain detailed records throughout our entire supply chain.

CMP's Third-Party Lab testing includes components manufactured from the following list of materials:

- ❖ *PVC*
- ❖ *ABS*
- ❖ *Polyurethane*
- ❖ *Kynar*
- ❖ *EPDM*
- ❖ *EVA*
- ❖ *Xylex*
- ❖ *AES*
- ❖ *Polypropylene*



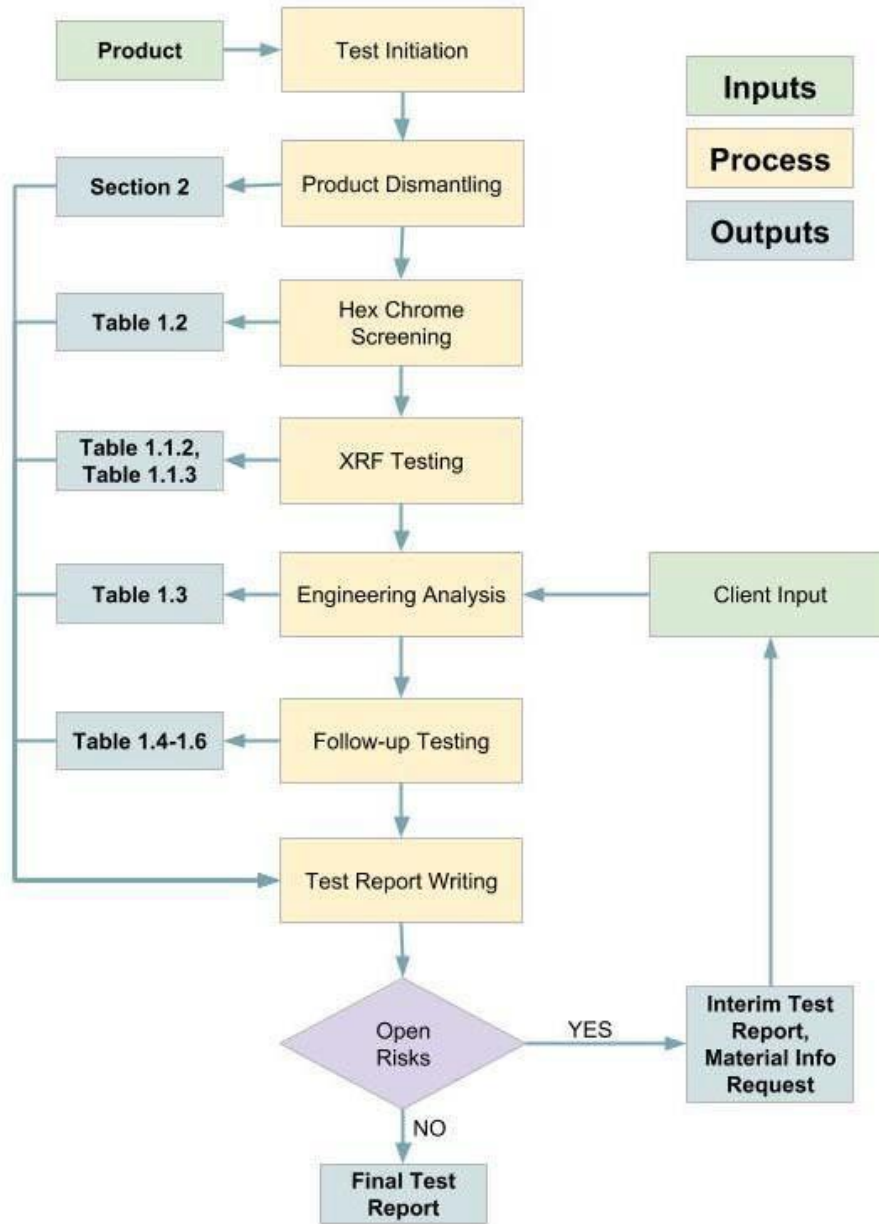
CMP will be providing updates to requests for Prop 65 information.

Thank You

Appendices

Appendix A Test Methodology

A.1 Product Analysis Process Flow Chart



Restricted Materials Conformity Report

CETR-CMP01.2



Prepared for:	CMP Corporation
Part Name:	9 Items
Part/Model Number:	-
Samples Received Date:	August 14, 2018
Testing Period:	August 28 and September 11, 2018
Tests Requested:	California Proposition 65 (The Safe Drinking Water and Toxic Enforcement Act, 1986) Date of Report: September 12, 2018

Results

Directive / Regulation	Conclusions	Substances
Proposition 65	Compliant contingent	2-MBT

Legend

Compliant:	Compliant for all evaluated substances.
Compliant contingent:	Compliance is contingent upon client addressing identified substances. The action may include a review of risk, application, or use of an applicable declaration/warning.
Compliant pending:	Compliant for most substances. Further testing/evaluation of identified substances by ClaiGAN is required to address remaining risks.
Open risk:	Identified substance risks require client information or feedback to resolve.
Not compliant:	Not compliant for identified substances.



1 Test Results

For additional information on testing and regulatory thresholds, and exemption notation, please see Appendices A and B of this report.

1.1 XRF Spectroscopy

1.1.1 General Remarks

1. LOD = limit of detection for that element in that matrix material.
2. The quoted measurement uncertainty represents 2 standard deviations.
3. All measurements were carried out using the Niton® XRF analyzer (Section A.2).

1.1.2 Elements Listed Under RoHS

Sample		Results (ppm)			
Number	Description	Pb	Cd	Hg	Br
21110-040 PVC					
4326-1	White Tub	<LOD	<LOD	<LOD	<LOD
4326-2	Plastic Bag	<LOD	<LOD	<LOD	14 ± 5
26200-237-300 EPDM					
4327-1	White Washer	<LOD	<LOD	<LOD	<LOD
25240-200-000 PC					
4330-1	Plastic Component	<LOD	<LOD	<LOD	<LOD
7-2010 EVA Tube					
4332-1	Black Tube	<LOD	<LOD	<LOD	<LOD
29252-099-000					
4334-1	Screw	<LOD	<LOD	<LOD	<LOD
4334-2	Black Insert	<LOD	<LOD	<LOD	<LOD
4334-3	White Insert	<LOD	<LOD	<LOD	<LOD
4334-4	Blue Housing	<LOD	<LOD	<LOD	<LOD
25201-007 ABS					
4336-1	White Housing	<LOD	<LOD	<LOD	<LOD
4336-2	White Insert	<LOD	<LOD	<LOD	73 ± 4
4336-3	Grey Seal	<LOD	<LOD	<LOD	<LOD
4336-4	Dark Grey Lid	<LOD	<LOD	<LOD	<LOD
4336-5	Screw	<LOD	<LOD	<LOD	<LOD
29142-110-020					
4338-1	White Housing	<LOD	<LOD	<LOD	<LOD
4338-2	Brown Component	<LOD	<LOD	<LOD	<LOD
25241-352-000 Xyley					
4341-1	Plastic Cover A	<LOD	<LOD	<LOD	<LOD
4341-2	White Plastic Insert	<LOD	<LOD	<LOD	71746 ± 1925
4341-3	Plastic Cover B	<LOD	<LOD	<LOD	<LOD



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Number	Sample Description	Results (ppm)			
		Pb	Cd	Hg	Br
7-11404 Kynar					
4343-1	Clear Plastic	<LOD	<LOD	<LOD	<LOD
4343-2	Green Plastic	<LOD	<LOD	<LOD	<LOD



1.1.3 Additional Elements

Sample Number	Sample Description	Results (ppm)		
		Ni	Sb	Cl
21110-040 PVC				
4326-1	White Tub	<LOD	<LOD	482516 ± 8651
4326-2	Plastic Bag	<LOD	<LOD	454 ± 249
26200-237-300 EPDM				
4327-1	White Washer	<LOD	<LOD	<LOD
25240-200-000 PC				
4330-1	Plastic Component	<LOD	<LOD	<LOD
7-2010 EVA Tube				
4332-1	Black Tube	<LOD	<LOD	<LOD
29252-099-000				
4334-1	Screw	100510 ± 1190	<LOD	N/A
4334-2	Black Insert	<LOD	<LOD	<LOD
4334-3	White Insert	<LOD	<LOD	<LOD
4334-4	Blue Housing	<LOD	<LOD	487859 ± 8096
25201-007 ABS				
4336-1	White Housing	<LOD	<LOD	500034 ± 8857
4336-2	White Insert	<LOD	31 ± 17	<LOD
4336-3	Grey Seal	<LOD	<LOD	<LOD
4336-4	Dark Grey Lid	<LOD	137 ± 30	399542 ± 8660
4336-5	Screw	107470 ± 1320	<LOD	N/A
29142-110-020				
4338-1	White Housing	<LOD	<LOD	<LOD
4338-2	Brown Component	<LOD	<LOD	<LOD
25241-352-000 Xylex				
4341-1	Plastic Cover A	<LOD	<LOD	<LOD
4341-2	White Plastic Insert	<LOD	38566 ± 1061	<LOD
4341-3	Plastic Cover B	<LOD	<LOD	<LOD
7-11404 Kynar				
4343-1	Clear Plastic	<LOD	<LOD	<LOD
4343-2	Green Plastic	<LOD	<LOD	<LOD

NOTE: For these elements and associated substances, risk assessment is carried out by **Engineering Analysis**.

**1.2 ChromateCheck®**

Sample Number	Sample Description	Conclusion
21110-040 PVC		
4326-1	White Tub	Pass
4326-2	Plastic Bag	Pass
26200-237-300 EPDM		
4327-1	White Washer	Pass
25240-200-000 PC		
4330-1	Plastic Component	Pass
7-2010 EVA Tube		
4332-1	Black Tube	Pass
29252-099-000		
4334-1	Screw	Pass
4334-2	Black Insert	Pass
4334-3	White Insert	Pass
4334-4	Blue Housing	Pass
25201-007 ABS		
4336-1	White Housing	Pass
4336-2	White Insert	Pass
4336-3	Grey Seal	Pass
4336-4	Dark Grey Lid	Pass
4336-5	Screw	Pass
29142-110-020		
4338-1	White Housing	Pass
4338-2	Brown Component	Pass
25241-352-000 Xyley		
4341-1	Plastic Cover A	Pass
4341-2	White Plastic Insert	Pass
4341-3	Plastic Cover B	Pass
7-11404 Kynar		
4343-1	Clear Plastic	Pass
4343-2	Green Plastic	Pass



1.3 Engineering Analysis

Sample		Proposition 65	
Number	Description	Risk	Comments
21110-040 PVC			
4326-1	White Tub	Low	
4326-2	Plastic Bag	Low	
26200-237-300 EPDM			
4327-1	White Washer	High	Possible ETU, 2-MBT
25240-200-000 PC			
4330-1	Plastic Component	Low	
7-2010 EVA Tube			
4332-1	Black Tube	Low	
29252-099-000			
4334-1	Screw	Low	
4334-2	Black Insert	Low	
4334-3	White Insert	Low	
4334-4	Blue Housing	Low	
25201-007 ABS			
4336-1	White Housing	Low	
4336-2	White Insert	Low	
4336-3	Grey Seal	Low	
4336-4	Dark Grey Lid	Low	
4336-5	Screw	Low	
29142-110-020			
4338-1	White Housing	Low	
4338-2	Brown Component	Low	
25241-352-000 Xyley			
4341-1	Plastic Cover A	Low	
4341-2	White Plastic Insert	Low	
4341-3	Plastic Cover B	Low	
7-11404 Kynar			
4343-1	Clear Plastic	Low	
4343-2	Green Plastic	Low	

NOTE: Unless otherwise indicated, Low Risk was determined by Engineering Analysis.



1.4 GC/LC-MS

1.4.1 Tests

Testing for These substances is motivated by Engineering Analysis. GC/LC-MS testing was carried out for the following compounds:

Organic Compounds

ETU
2-MBT

1.4.2 Results

Testing was carried out on the sample shown in the table below (ND = not detected).

Sample		Results (ppm)	
Number	Description	ETU	2-MBT
4327-1	White Washer	ND	12092

1.5 Conclusions for Substances Assessed in Follow-Up Testing

Sample		Conclusions
Number	Description	Proposition 65
4327-1	White Washer	Compliant contingent (2-MBT)



Appendix B Notes on Regulations

B.1 Notes Regarding RoHS

B.1.1 RoHS 2 (Directive 2011/65/EU)

Assessment of compliance for RoHS restricted substances (Pb, Hg, Cd, Cr^{VI+}, PBBs and PBDEs) is based on the risk-based approach of the EN/IEC 62321 standards. The EN/IEC 62321 standards are not comprehensive for all situations, rely partially on risk-based judgment, and have the opportunity for error. Claigan follows the EN/IEC 62321 standards for conformity assessment in good faith; however, the client should be aware that these standards have the opportunity for error.

Claigan’s application of EN 62321-2 (disassembly, disjointment, and mechanical sample preparation) involves complicated processes regarding the handling of single and composite materials. Although error is minimized with the use of controls, validation, methodology, and best efforts, no disassembly process is immune to the possibility of missing or misinterpreting a result.

The risk-based approach extends to the sampling of brominated materials for assessment of the risk of PBB/PBDE content. Samples selected for follow up testing by GC-MS are representative of the types of materials that are identified as risks for PBB/PBDE content following XRF screening, and of sufficient sample size to obtain conclusive PBB/PBDE detection by GC-MS testing. Sample materials with XRF screening results that indicate less than 1500 ppm of Br or Sb present are not considered likely to contain PBB or PBDE as a flame retardant.

For RoHS, Pass/FAIL/Inconclusive are defined in the following table:

RoHS XRF Thresholds

Elements	Regulated Limit	Pass	Inconclusive **	FAIL
Pb	1000 ppm	<700 ppm	700 ppm ≤ [Pb] ≤ 1300 ppm*	>1300 ppm*
Cd	100 ppm	<70 ppm	70 ppm ≤ [Cd] ≤ 130 ppm*	>130 ppm*
Hg	1000 ppm	<700 ppm	700 ppm ≤ [Hg] ≤ 1300 ppm*	>1300 ppm*
Br	1000 ppm (as PBB’s or PBDE’s)	<1500 ppm	≥1500 ppm	N/A

* Unless a valid exemption applies or composite material is evaluated, in which case testing proceeds according to the Claigan Sample Testing process.

** **Inconclusive** results for RoHS thresholds for Pb, Cd and Hg are generally resolved by ICP-OES. **Inconclusive** results for Br are resolved using a material-type risk-based assessment that includes analytical review by GC-MS for PBB/PBDE content for samples of sufficient size.

Legend for Pass by Exemption or other noted conditions:

- 6a:** RoHS Exemption III 6(a): Pb in steel up to 3500 ppm (0.35%) for machining purposes and in galvanised steel.
- 6b:** RoHS Exemption III 6(b): Pb in aluminum up to 4000 ppm (0.4%).
- 6c:** RoHS Exemption III 6(c): Pb in copper alloy up to 40,000 ppm (4%).
- 7a:** RoHS Exemption III 7(a): Pb in high temperature solder (>85% Pb).
- 7c1:** RoHS Exemption III 7(c)-I: Electrical and electronic components containing Pb in a glass or ceramic other than dielectric ceramic in capacitors.
- 7c2:** RoHS Exemption III 7(c)-II: Pb in high voltage ceramic capacitors.



8b: RoHS Exemption III 8(b): Cd and its compounds in electrical contacts.

13a: RoHS Exemption III 13(a): Pb in optical glass.

13b: RoHS Exemption III 13(b): Cd and Pb in filter glasses, and glass for reflectance purposes.

21: RoHS Exemption III 21: Pb and Cd in printing inks for the application of enamels on glasses, such as borosilicate and soda lime glasses.

IV1b: RoHS Exemption IV 1(b): Pb anodes in electrochemical oxygen sensors.

IV5: RoHS Exemption IV 5: Pb in shielding for ionizing radiation.

IV33: RoHS Exemption IV 33: Pb in solders on PCB's used in Directive 93/42/EEC class IIb mobile medical devices other than defibrillators.

Br: For Br concentrations above 1500ppm, accompanied by an Sb concentration above 1500ppm, additional work may be required to determine if the Br is in the form of PBB's or PBDE's. Metals are unlikely to contain PBB's or PBDE's and are therefore marked Pass.

Pb: Sample xxxx-x is out of scope of RoHS as it is considered part of the packaging. EU Packaging Regulation and US Toxics in Packaging restrict the RoHS heavy metals in packaging to 100ppm combined per package or package component.

B.1.2 RoHS 3 (Directive 2015/863)

Assessment of compliance for RoHS restricted substances is based on the risk-based approach of the EN/IEC 62321 standards. Under RoHS 3, four phthalates (DEHP, DIBP, DBP and BBP) are restricted in homogenous materials at 1000 ppm. Even with the best of processes, validations, and techniques, the disassembly process according to EN 62321-2 may not identify every potential instance of risk of phthalates. Very small or thin materials, such as glues or adhesives, may not always be identified for phthalate risk. Claigan will ensure best efforts are made to identify risk; however, there are currently no 100% effective methods for extremely small amounts of phthalates.

B.2 Notes Regarding REACH

B.2.1 REACH Article 33 Communication Requirements

REACH Substances of Very High Concern (SVHCs) are reportable if present in an article above 0.1% w/w. An article is defined by the Court of Justice of the European Union Case C-106/14. The Candidate List of SVHCs is updated approximately biannually. The samples reviewed in this test report for SVHCs were reviewed to the list of substances as of the 15 January 2018, unless otherwise noted.

Compliance for REACH SVHC's is a risk-based assessment based on engineering review, screening testing, and in-depth testing of high risk materials. The evaluation is structured to include all major applicable REACH SVHC's, with a focus on substances included in industry declarations for applicable products. Because of the large number of REACH SVHC's, errors and gaps in knowledge in the supply chain, and potential unknown uses of some REACH SVHC's, there is opportunity for a substance to be omitted from the review.

B.2.2 REACH Article 67 Restrictions

REACH restrictions are imposed for specific substance and specific use scenarios. Restriction thresholds vary by application. Samples are reviewed for REACH restrictions based on XRF identification of substances, Engineering Analysis, and application information disclosed by the client. The samples are evaluated to the REACH Restrictions current as of the date of testing.



B.3 Note Regarding Proposition 65

Compliance for California Proposition 65 is a risk-based assessment consisting of screening testing, engineering review, and in-depth testing of high risk materials. The evaluation is structured to include all major applicable California Proposition 65 substances, with a focus on substances included in known California Proposition 65 prosecutions and applicable exposure scenarios.

According to the California Code of Regulations New Section 12900 (a) 4, the product can be identified as having no intentional exposure if “all the reported results show that the chemical in question was not detected.” In the event of a detected presence of a substance, the appropriate test or recommendation will be applied based on settlement agreements and agreed upon exposure risks. Trace monomers that are inhalation risks only or have very high safe harbor limits will be deemed low risk for the purpose of this report. The burden of investigation for these trace monomers is disproportional to their risk of non-compliance for these substances. Exceptions to this case may be made at the specific request of the client, or specific identification of the route of exposure being food contact or wearable devices. The manufacturer (or other actor providing an exposure) is ultimately responsible for determining if a warning is required for substances identified in this report.

The risk assessment is based on reasonably foreseeable exposure scenarios, exposure risks for specific substances, and previous California Proposition 65 notices. Complicated or creative exposure scenarios (such as transferal of substances to hands through routine touching of parts containing readily available surface amounts of a listed chemical and the listed chemical subsequently ingested via hand-to-mouth behavior, hand-to-food-to-mouth behavior, or through hand-to-cigarette-to-lung behavior) are not necessarily covered in the risk assessment.

If the determination of a specific exposure level is required, additional work using the Office of Environmental Health Hazard Assessment (OEHHA) Safe Use Determination (SUD) models could be conducted in some cases.

References

- ¹ Thermo Scientific, *RoHS Compliance Screening – Elemental Limits of Detection in Metals and Polymers*, Doc. AN44808 (2008).
- ² XOS, *HD Mobile¹⁰¹ 4-pager brochure rev. 102815* (2015).
- ³ Hybrivet Systems, *Performance Characteristics of ChromateCheck™ Swabs II*, Application Note CR-50 (2009).
- ⁴ A.B. Fialkov et al., 10th Annual Meeting of AICS, *isranalytica.org/Abstracts/Fialkov.DOC* (2007).
- ⁵ Evans Analytical Group, *ICP-OES and ICP-MS Detection Limit Guide*, <http://www.eag.com/documents/icp-oes-ms-detection-limit-guidance-BR023.pdf> (2014).