

REACH, RoHS & Azo Compounds Compliance Declaration Letter

RoHS Compliance Declaration – Restriction of the use of Hazardous Substances

We hereby declare that Netti wheelchairs with all accessories are compliant with all requirements set by European RoHS 2.0 Directive 2011/65/EU and the European Delegation Directive (EU)2021/1980-hazardous substances in electrical and electronic.

REACH Compliance Declaration (SVHC 2025-06)

We hereby declare that Netti wheelchairs with all accessories fully comply with the related requirements of European Union Regulation (EC)1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH):

1. Under the structure of the REACH regulation, Alu Rehab AS is a manufacturer of "ARTICLES" to EU customers. We do not manufacture "substances" or "preparations" and our articles do not involve the "intentional release of substances". Accordingly, we foresee no registration or pre-registration or Authorization requirement for the products we supply.
2. With reference to the requirements in Article 33 of REACH: Duty to communicate information on substances in articles. We declare that none of the SVHCs (Substances of Very High Concern) named in the list of SVHC released by ECHA 2025-06, is present in Netti products (including packaging) in quantities totalling in a concentration equal or above 0.1%.
3. With reference to the requirement in Article 67 of REACH: A substance on its own, in a preparation or in an article, for which the candidate list contains a restriction, shall not be manufactured, placed on the market or used unless it complies with the conditions of that restriction. We declare that none of the substances in the Conditions of restriction is present in Netti products (including package).

The REACH regulation is updated frequently, with addition of restricted SVHC substances into the candidate list. Alu Rehab perform regular surveillance of the candidate list and update this declaration to reflect these changes.

Links: <https://echa.europa.eu/candidate-list-table>
<https://echa.europa.eu/substances-restricted-under-reach>

REACH annex XVII (entry 43) compliance declaration - Restriction of the use of Azo-colourants and Azodyes

We hereby declare that Netti wheelchairs with all accessories do not contain any of the specific aromatic compounds listed in REACH annex XVII appendix 8, with a concentration over 30 µg/g.

We further declare that all statements in this letter are true and accurate. To ensure our customers, the continual supply of reliable and safe products, we ensure that our suppliers fulfil all requirements regarding chemical substances and prepared materials.

Date: August 25, 2025



Mike Dongelmans
Product and development manager
Netti

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