

## **Re.: Information on WEEE, RoHS and ElektroG, including WEEE-registration**

Ladies and Gentlemen,

By means of their implementation into the national law of the states of the European Union, the European directives 2002/95/EC and 2002/96/EC – better known by their acronyms RoHS and WEEE – pertain to vast areas of the electrical and electronics industry. The ads-tec GmbH has made an in-depth analysis of the topic with regard to their consequences for the company, its customers and its suppliers. We would like to explain to you as our customer the most important aspects.

### **ads-tec: “B2B-Device”**

Generally, all of our products are designed and manufactured exclusively for professional and industrial use (solely other than for use by private households and comparable users – “purely B2B devices”).

### **WEEE-registration**

We have now successfully registered with the German Waste Electrical and Electronic Equipment Register (WEEE-register). In doing so, our B2B-status was confirmed and the assignment of the ads-tec products to the device categories 3 (IT and telecommunication devices) and/or 9 (steering and controlling devices) was accepted in the manner described below. We were assigned the WEEE-Reg.-No. **DE 27218473**.

### **Return option in case of disposal**

In accordance with our statutory duties, we offer a return option when the service life of the device is expended, inasmuch as our products are devices within the meaning of the ElektroG (German implementation of WEEE and RoHS) and inasmuch as ads-tec is a manufacturer within the meaning of the directives and laws. The corresponding ads-tec devices are marked accordingly on the label.

### **RoHS-conformity**

Likewise, we ensure the timely RoHS-conformity in accordance with the regulations for the device categories 3 and 9. As you probably already know, devices of the category 9 are excluded from the bans on hazardous substances. In accordance with the general market and technology trends, we shall, however, successively and anticipatorily implement the conver-

sion for these products as well.

### **Responsibility for our OEM-customers**

Please take into account that the obligation of the manufacturer does not apply to ads-tec inasmuch as the devices are delivered as OEM-products under their own brand. If so, you are placed in the role of the manufacturer and are responsible yourself for the return, disposal, etc. In this case, we kindly ask you to consult with regarding your own registration with the WEEE-register, in order to communicate a homogeneous message.

OEM-customers shall receive support from ads-tec with regard to the adherence to the regulations on the bans of hazardous substances and the category assignment and are requested to adhere to a uniform procedure opposite officials.

### **Products from ads-tec as integrated parts of industrial systems**

As finished products, the systems produced by ads-tec generally fall under WEEE and RoHS, inasmuch as they are not to be classified as securely integrated, functional components of a larger system, which itself does not fall under the directive. The latter shall be the case if it is so closely adapted to the surrounding system in industrial use, that it is more likely to be considered a part of a superordinate system, particularly if the installation is stationary and carried out exclusively by trained specialized personnel.

### **Assignment of the device categories**

Inasmuch as ads-tec products are devices within the meaning of WEEE/RoHS and ElektroG, the predominate portion thereof belong to category 9 because they perform steering, controlling and analysis tasks, and are each adapted to their specific purpose. In addition, ads-tec also delivers devices that are more likely to be assigned to classic professional IT, such as our Access Point for the area of logistics, for example. Accordingly, we assign the device category 3 in this case. In all cases, the ads-tec devices are, according to the view of the legislature, also to be distinguished from standard PCs and their peripherals.

### **Labeling / WEEE-symbol**

The WEEE-symbol of the underscored and crossed-out trashcan on your device points out that it is a device to which WEEE applies and that, accordingly, it must be disposed of separately. This symbol is not entirely necessary in some states of the European Union, such as Germany, for devices solely used commercially, but it is used by ads-tec uniformly across all of Europe. The symbol does not, however, mean that they are to be returned to communal collecting points, as is the case with privately used electrical devices. Please contact ads-tec directly or your ads-tec distributor in case of disposal. The ads-tec devices are accompanied by additional information in this regard.

### Conclusion

- The ads-tec products fall in part under device category 9, in part under category 3 and as integrated component of industrial systems, occasionally do not fall under the scope of application.
- In all cases, however, the ads-tec products are to be declared as “purely B2B,” i.e. exclusively for professional commercial use.
- Devices for which ads-tec has assumed the obligations of the manufacturer, shall be labeled accordingly.
- OEM-customers shall receive support from ads-tec with regard to the adherence to the regulations on the bans of hazardous substances and the category assignment and are requested to adhere to a uniform procedure opposite officials.
- The regulations pertaining to the bans on hazardous substances are fulfilled in accordance with RoHS and regulations pertaining to exceptions (cat. 9) have only been applied transitionally.
- The WEEE-registry has acknowledged ads-tec as a “manufacturer of purely B2B devices” classified under categories 9 and/or 3 and ads-tec has been assigned an official registry number.