

## **GLOBAL COMPLIANCE**

Universal Robots is committed to complying with all applicable laws and regulations of those countries in which we do business.

### **EUROPE**

Universal Robots A/S ("Universal Robots") manufactures industrial robots with added safety functions to enable collaborative application as well as typical industrial applications. Our robots are partial machines according to the Machinery Directive; therefore, a Declaration of Incorporation (DOI) is provided. UR robots comply with the applicable EU Directives to the extent possible as partly completed machinery. As partly completed machinery, no EC compliance markings are allowed (e.g. LVD, EMCD, RoHS, WEEE, REACH). We monitor EU directives and regulations to be current.

See the specific product's Declaration of Incorporation (DOI) for details about compliance to the following:

2006/42/EC	Machinery Directive (MD)
2023/1230	Machinery Regulation (MR)
2014/35/EU	Low-voltage Directive (LVD)
2014/30/EU	EMC Directive (EMCD)
2024/1689	Al Act

#### UR Operations comply as described below:

**2017/2102/EU Restriction of Hazardous Substances (RoHS 2) with 2015/863/EU** UR products are characterized as industrial robots and within scope of RoHS. UR complies with the substance restriction provisions in RoHS 2 including the added Category 11 products and the 4 new phthalates.

**2019/2193/EU Waste Electrical & Electronic Equipment** (WEEE) UR complies with registration & reporting to Denmark. Products are not marked with the "Wheelie Bin" symbol, due to being partly completed machinery.

2009/148/EC Protection of workers from the risks related to exposure to asbestos at work Universal Robots' products do not contain asbestos.

**Canada:** Most UR robots are marked "cTUV" indicating their certification to CAN/CSA Z434-14 + GI1 (R2019).

**USA:** All UR robots comply with ANSI RIA R15.06-1-12, which is a US National Adoption of ISO 10218-1 & -2:2011.

**2019/1021 Regulation (EU) Persistent Organic Pollutants (POPs)** Regulates operations, supply chain, and final products. POP is a regulation about "Persistent Organic Pollutants", with the goal of phasing out production and use of the substances. UR does not produce POPs.

1907/2006 with 2019/1148 Registration, Evaluation, Authorization, & Restriction of Chemicals (REACH)

Universal Robots is committed to the safe use and identification of chemicals per the requirements of EU REACH. Universal Robots complies with EU REACH and is not required to pre-register. UR products are "articles" as defined in 3(3) of REACH, and do not release substances under normal use. We do not have substances present in our products in quantities totaling over 1 tonne per year. None of the currently identified SVHCs (substances of very high concern) on the European Chemical Agency's (ECHA) Candidate List are contained in Universal Robots' products above the concentration specified. Universal Robots is committed to providing our customers with information regarding substances of concern in our products. We will continue to monitor our products under EU REACH.

### NORTH AMERICA

**Toxic Substances Control Act (TSCA) (USA).** Requires reporting, record-keeping, testing and restrictions on certain substances in US operations and supply chain(s). It is like EU REACH but with different lists. UR does not produce these substances.

CHINA

China's Administrative Measures for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products (China RoHS 2)

Universal Robots complies with the requirements set forth under China's Administrative Measures on the Control of Pollution Caused by Electronic Information Products. China RoHS requires that all electronic and electrical products that are sold in the People's Republic of China be marked with the appropriate Electronic Information Products (EIP) logo. In addition to the logo, a disclosure table indicating the presence of any of the restricted substances must be provided in Chinese. Universal Robots is marking products with the EIP logo and including the disclosure table within manuals. UR will monitor China RoHS as it evolves.

### THE REPUBLIC OF KOREA

Korea's KCC mark signifies compliance product EMC and electrical requirements for electrical and electronic equipment and components, while the KCCs mark signifies compliance with product safety requirements.

Universal Robots complies with the requirements for KC approval and marking of our products. KC requires that all electronic and electrical products that are exported into the Republic of Korea be labeled with the KCC mark and the products' registration. In addition, UR products are registered with KOSHA (Korea Occupational Safety and Health Agency). Products are marked with the KCCs logo to signify the certification and the products' registration. UR will continue to monitor Korea's requirements.

Odense Denmark, 10 January 2025

Roberta Nelson Sher

Roberta Nelson Shea Global Technical Compliance Officer

# UNIVERSAL ROBOTS

## **Conflict Minerals Policy – USA Dodd-Frank Act**

The term "conflict mineral" refers to minerals and their derivatives, such as tantalum, tin, tungsten, and gold, which have been linked to the funding of armed groups in the "conflict region" of the Democratic Republic of the Congo and adjacent countries (DRC). Minerals and derivates are classified as conflict minerals regardless of where they are sourced, processed, or sold.

In 2010, Section 1502 of the Dodd-Frank Act, which aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in the conflict region, was signed into law. The Act requires companies to perform due diligence with respect to the sourcing of conflict minerals and to file annual reports relating to the use of conflict minerals. Universal Robots supports the goals and objectives of Section 1502 of the Dodd-Frank Act; therefore, Universal Robots is committed to using conflict-free minerals in its products and complying with the conflict minerals due diligence and reporting obligations required under the Act. Universal Robots, through Teradyne, complies with Responsible Business Alliance (RBA) Code of Conduct and performs due diligence to ensure that it does not purchase any products, components, or materials that fund armed groups. Teradyne is a member of the Conflict Free Sourcing Initiative (CFSI). Universal Robots is included in the reporting as a wholly owned company which was acquired by Teradyne in 2015.

Universal Robots is committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility. Universal Robots suppliers are required to comply with Universal Robots' Supplier Code of Conduct, which includes requirements relating to conflict minerals and responsible sourcing. Suppliers are responsible for passing these same requirements onto their suppliers. Universal Robots' Supplier Code of Conduct requires suppliers to implement a policy and process to reasonably assure that the mining of the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that perpetrate human rights abuses in the DRC. Universal Robots expects its suppliers to comply with the RBA Code of Conduct and the RBA and Global eSustainability Initiative (GeSI) Conflict Free Smelter Program. In compliance with said programs, suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Universal Robots for reporting to Teradyne. Universal Robots appreciates the commitment of its suppliers to the goal of using conflict-free minerals in its products and in supporting Universal Robots' conflict free sourcing policy.

Teradyne has a toll-free, confidential hot line (1-866-388-1288) for reporting complaints relating to Universal Robots' Conflict Minerals Policy, its Conflict Minerals program and its Form SD and Conflict Minerals Report (available through Teradyne).

Any questions about this policy, program or reports may be sent to Teradyne's this e-mail: <u>conflict.minerals@teradyne.com</u>

## GLOBAL CORPORATE SOCIAL RESPONSIBILITY (CSR)

### Corporate Social Responsibility (CSR) as UR and as a part of Teradyne Robotics

We integrate quality, safety and sustainability into every aspect of our business, with the goal of engineering a better future.

Teradyne Robotics solutions are fundamental to the growth of many industries and have a profound effect on the world around us. We respect this global influence and realize that we have the opportunity, as well as responsibility, to apply technology in ways that advance society.

For more information, see Teradyne's Corporate Social Responsibility Report which encompasses all Teradyne companies. <u>https://www.teradyne.com/wp-content/uploads/2024/10/Teradyne-CSR-Report-2024.pdf</u>

### Universal Robots Corporate Social Responsibility Report

As required by Danish Law, see UR's Corporate Social Responsibility Report which is updated annually. https://www.universal-robots.com/about-universal-robots/social-responsibility/

Odense Denmark, 10 January 2025

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