

Date: January 22, 2026

To: Customers and Regulatory Stakeholders

Subject: Blanket Regulatory Compliance Letter — MP-800 Door Closer

Dear Customer/Partner,

MPowr Products Inc. (“MPowr”) hereby issues this blanket statement of compliance for the **MP-800 Door Closer** (mechanical, spring-loaded). The MP-800 is an **article** comprised primarily of a zinc housing, galvanized/zinc-plated steel hardware, engineered polymer components, and silicone lubricant. **No PFAS are intentionally added** to the product or its packaging.

Scope

This letter applies to the MP-800 Door Closer (all standard configurations and finishes) and its primary **packaging** as shipped by MPowr. It does not apply to third-party accessories or field-applied treatments outside MPowr’s control.

Declarations of Compliance (2026)

MPowr confirms that, to the best of our knowledge and based on supplier documentation and internal review, the MP-800 Door Closer complies with the following frameworks as applicable to **articles** and packaging:

1. **PFAS (Per- and Polyfluoroalkyl Substances) — Company Statement**

No PFAS are intentionally added to the MP-800, its coatings, lubricants, adhesives (if any), or packaging. MPowr requires supplier attestations for any materials with potential PFAS risk.

2. **EU REACH — Article Duties and Restrictions**

- **SVHC (Article 33):** No Candidate List SVHC are present at or above **0.1% w/w** at the article level (including packaging). Accordingly, **no SCIP notification** is required for the MP-800.
- **Annex XVII:** The product conforms to applicable restrictions relevant to its composition and intended use.

3. **EU POPs Regulation (EU) 2019/1021**

No intentionally added persistent organic pollutants (e.g., SCCPs). The MP-800 and associated coatings/lubricants are not formulated with restricted POPs.

4. **Packaging Heavy Metals / Toxics in Packaging**

- **EU Packaging (Dir. 94/62/EC) heavy-metals total ≤ 100 ppm** (Pb, Cd, Hg, Cr(VI)) for packaging and components; MPowr aligns with evolving PPWR requirements.

- **US TPCB Model:** Packaging meets the heavy-metals limits and avoids intentionally added substances restricted under state-adopted TPCB updates (including PFAS/phthalates where applicable).
- 5. **US TSCA — Persistent, Bioaccumulative, and Toxic (PBT) Substances (Section 6(h))**
The MP-800 and associated lubricants/coatings are not intentionally formulated with PIP (3:1), decaBDE, 2,4,6-TTBP (consumer uses), HCBd, or PCTP.
- 6. **US TSCA — Risk Management Rules for Solvents (Section 6(a))**
The MP-800 is a mechanical article and **does not use or rely on trichloroethylene (TCE), perchloroethylene (PCE), or carbon tetrachloride (CTC)** in design, manufacture, maintenance, or intended use. MPowr monitors the EPA's final risk-management rules for TCE/PCE/CTC and has confirmed with suppliers that these solvents are not used in relevant lubricants, coatings, or process chemicals for the product's manufacture.
- 7. **California Proposition 65**
Based on composition, reasonably foreseeable use, and supplier information, MPowr does **not** expect exposures requiring a Proposition 65 warning for the MP-800. MPowr will reassess and update this statement if new information indicates otherwise.
- 8. **Safety Data Sheet (SDS) — Article Status**
The MP-800 is an **article** and is not a hazardous chemical under OSHA Hazard Communication for its shipped form; therefore, an SDS is **not required**. Safety and installation information is provided in MPowr product literature.
- 9. **RoHS / WEEE / Batteries / Radio Equipment — Applicability Clarification**
The MP-800 is a non-electrical mechanical article with **no batteries** and **no radio components**. As such, **WEEE, Batteries, and RED** are **not applicable**.
RoHS requirements target electrical/electronic equipment; while the MP-800 is **out of scope**, many customers request a RoHS statement—MPowr can provide this clarification on request.
- 10. **EU/UK CPR — EN 1154 (If Applicable to Market Placement)**
If a Declaration of Performance (DoP) is required for EU/UK placement against **EN 1154 (Door Closers)**, MPowr can provide a DoP template and coordinate with the relevant notified/approved body as needed for the marketed configuration.

MPowr Products Inc.
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Basis and Ongoing Diligence

These declarations are supported by MPowr's internal bill-of-materials review, supplier compliance attestations, and—where relevant—SDS or technical data for lubricants, coatings, polymers, and packaging. MPowr maintains a regulatory monitoring process and will promptly communicate any material changes affecting this letter.

Effective Date and Validity

This letter is effective **through December 31, 2026** (or until superseded by a newer version). It reflects the regulatory status and supplier confirmations available at the date of signature.

Sincerely,

Radek Rybicki

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A handwritten signature in blue ink, appearing to be "Radek Rybicki", written in a stylized, cursive-like font.