



# RESTRICTION OF HAZARDOUS SUBSTANCES (RoHS) POLICY

Policy-28

Rev 00

Rev Date: 06-10-2023

## Policy Statement

The European Restriction of Hazardous Substances Directive 2002/95/EC (the “RoHS Directive”) was introduced to restrict the use of certain hazardous substances in electrical and electronic equipment. The recast of this directive 2011/65/EU introduced additional requirements for Declarations of Conformity and associated CE Markings. Further amendments under EU Directive 2015/863 introduced phthalate restrictions, which came into force on 22 July 2019 and similar RoHS-type legislation has emerged in several other countries worldwide.

This declaration shares our approach to managing hazardous substances in compliance with all relevant RoHS legal requirements and industry good practice.

## Scope

This applies to the material procured by the company from the direct and indirect suppliers.

## Commitment

The Company complies with all applicable RoHS legal requirements worldwide. Our global Sustainability function monitors and track developments in RoHS legislation worldwide to ensure our policies, procedures and practices are regularly reviewed and updated to respond to new product compliance requirements.

The Company products placed on the market after 01 January 2013 comply with Directive 2011/65/EU, including the specific hazardous substances restrictions set out below, considering any exemptions permitted by law.

The Company product conforms with the essential requirements and provisions of:

- Directive 2011/65/EU on the restriction of the use of certain hazardous substances (ROHS) in electrical and electronic equipment (EEE) - for EEE placed on the market prior to 22 July 2019.
- As amended by EU Directive 2015/863 - for EEE placed on the market on or after 22 July 2019. As such, products produced by the company, conform to the following maximum concentration limits:

Hazardous Substances	Maximum concentration (by weight, homogeneous level)
Lead	1000 ppm
Mercury	1000 ppm
Cadmium	1000 ppm
Hexavalent Chromium	1000 ppm
Flame Retardants: PBB, PBDE	1000 ppm
Phthalates: DEHP, BBP, DBP, DIBP	1000 ppm

## Guideline

- Company shall establish the testing program, which includes periodic testing of an appropriate sample of the Company’s products and components to check and verify compliance with the thresholds set out above.
- The scope of the testing program includes products and components produced at our own



## RESTRICTION OF HAZARDOUS SUBSTANCES (RoHS) POLICY

Policy-28

Rev 00

Rev Date: 06-10-2023

manufacturing facility and supplier manufacturing facilities. Products and components are mechanically disjointed to the homogeneous level and tested in accordance with good laboratory practice using X-Ray Fluorescent (XRF) and wet chemical analysis where appropriate.

- During new supplier evaluation and selection process, the supplier shall conform to comply with the RoHS requirements.
- During annual supplier audit, the auditor must verify the compliance of the RoHS requirement.
- The company shall ensure & monitor the receiving of declaration and testing reports of the material substances from the direct / indirect suppliers on annual basis.

### Corrective Action

- The company shall be involved in supply chain and continue to work with all our suppliers to ensure that we are able to identify the use of SVHC substances in our supply chain, and grateful to pass the information to the customers about the SVHC substance status of the parts we manufacture and probably involved in someone's due diligence.
- The company shall address the requirements in the Purchase Agreement as well as in the purchasing terms and conditions.

Our approach allows us to demonstrate single component traceability to RoHS compliance and to issue Declarations of Conformity including test reports at the homogeneous level.

