



The Siemon Company - CONFIDENTIAL

Document Title:

Supplier Environmental Compliance

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1.0 Purpose

This procedure outlines the requirements for Siemon Company suppliers to ensure product compliance for global standards, regulations and Environmental, social, and governance (ESG).

- RoHS 3 -The European Union's directive 2011/65 and directive 2015/863 directive, Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS).
- China RoHS II.
- Russia RoHS EAEU TR 037/2016.
- Environmental Protection Agency - Toxic Substances Control Act (TSCA).
- California Proposition 65. Safe drinking water Office of Environmental Health Hazard Assessment.
- Conflict Minerals (CMRT and ECMRT) US SEC Dodd- Frank.
- The EU's regulation number 1907/2006 concerning Registration, Evaluation, Authorization and Restriction of Chemicals (REACH).
- Substance of Very High Concern (SVHC).
- SCIP Directive 2008/98/EC on waste (Waste Framework Directive).
- Ozone Depleting Substances (ODS):
- Persistent Organic Pollutants (POPS) Regulation (EU) 2019/1021.
- EU Packaging Directive 94/62/EC.
- EU Batteries Directive (2006/66/EC).
- PFAS (regulation EU 2019/1021 and EPA).
- Environmental, Social and Governance (ESG).

2.0 Scope

Applicable to all products, components, materials and finished goods purchased by The Siemon Company that will be incorporated into a product for sale to Siemon customers. Examples of items that do **not** fall under this scope include mold tooling, , office supplies, and food.

3.0 Definitions and Acronyms

- 3.1 Article: An object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition. (Derived from the EU REACH Regulation).
- 3.2 CAS: Chemical Abstracts Service Number: a number that uniquely identifies a chemical compound. The Chemical Abstracts Service is a service of the American Chemical Society.
- 3.3 Candidate List: A list of substances arising from the EU REACH regulation that have been identified as Substances of Very High Concern (SVHC) and which may become subject to authorization.
- 3.4 Conflict Minerals: Term defined by the Dodd-Frank Wall Street Reform and Consumer Protection Act. Minerals identified as sources of revenue for illegal / rebel activities in the Democratic Republic of the Congo and its surrounding countries.



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- 3.5 Exemptions: There are certain applications called exemptions where EU RoHS Restricted substances may be used. In this case, the item is considered RoHS compliant using an exemption.
- 3.6 EEE: Electrical & Electronic Equipment.
- 3.7 Environmentally Friendly Use Period (EFUP): The period during which a hazardous substance will not leach from a product. This time is to be 50 years minimum unless otherwise specified by Siemon Engineering.
- 3.8 EPA: Environmental Protection Agency.
- 3.9 EIP: Electronic Information Products.
- 3.10 ECHA: European Chemicals Agency.
- 3.11 EU: European Union.
- 3.12 FMD: Full Material Disclosure.
- 3.13 ODS: Ozone Depleting Substances.
- 3.14 Packaging: Products made of any materials of any nature to be used for the containment, protection, handling, delivery, and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer.
- 3.15 PPWD: Packaging and packaging waste directive.
- 3.16 POPS: Persistent Organic Pollutants.
- 3.17 Products: Items that are final assemblies that are sold to customers, including manufactured and branded products. For product environmental compliance, products are considered separately from their packaging materials.
- 3.18 California Proposition 65: officially known as the Safe Drinking Water and Toxic Enforcement Act.
- 3.19 REACH: European Union regulation for the Registration, Evaluation, and Authorization of Chemicals.
- 3.20 Restricted: The material present must not exceed the specified maximum concentration limits.
- 3.21 Reportable: Not restricted, however presence must be reported if it exceeds the specified maximum concentration limits where applicable.
- 3.22 RoHS: European Union directive for the Restriction of Hazardous Substances, and other similar restricted substance legislation in countries such as China, Korea, Turkey, Russia, UAE.
- 3.23 RoHS Compliant: Per directive (EU) 2015/863 the product does not contain any of the original six- hazardous substances with the addition of the 4 new Phthalates more than a specified concentration by weight in any of its homogeneous materials. Unless otherwise specified, "RoHS Compliant" shall mean EU RoHS compliant.
- 3.24 Substance: A chemical element and its compounds in the natural state or obtained by manufacturing process.
- 3.25 Substance of Very High Concern (SVHC): A REACH designation for a chemical that is a candidate for future restriction. If present above 0.1% by weight in an article, then the recipient of the article must be notified automatically.
- 3.26 SCIP: "Substance of Concern in Products". Typically referred to in conjunction with the SVHC "Candidate List" from EU REACH regulation.
- 3.27 TSCA: Toxic Substances Control Act. United States Environmental Protection Agency (EPA) published the final rules under Section 6(h) of the Toxic Substances Control Act (TSCA) for five Persistent, Bio-accumulative, and Toxic (PBT) chemicals.



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- 3.28 PFAS: polyfluoroalkyl substances/ PFAS regulations under the EPA and EU
- 3.29 CMR: Carcinogenic, mutagenic, and toxic to reproduction (part of Reach)
- 3.30 ESG: Environmental, Social and Governance. It is a business framework for considering environmental issues and social issues in the context of corporate governance.
- 3.31 ToxNot: platform to get supply chain data and streamline compliance and sustainability reporting. <https://toxnot.com/>.

4.0 Flowchart

N/A for this procedure.

5.0 Responsibilities

Suppliers shall adhere to this procedure. Siemon should conduct annual surveys with our suppliers to confirm compliance with the requirements contained in this document.

6.0 Procedure

The following regulations, directives, and government requirements shall be adhered to by Siemon suppliers of purchased raw materials, components and finished good assemblies.

6.1 Procedure to collect compliance information from our suppliers using ToxNot third party software. Siemon will email our suppliers a survey link from ToxNot. Suppliers can fill out the survey along with uploading declarations and material safety data sheets. The survey should have the following regulations:

- EU Rohs 3
- EU REACH
- EPA TSCA 6h
- California Prop65
- Conflict Minerals
- POP
- PFAS
- Ozone Depleting (Montreal Protocol Act)
- ESG

6.2 More information may be found in Siemon document WTN-RDL-POL-59, Siemon Material Compliance Policy. Please access the latest revision located in the QMS system.

7.0 Restricted / Controlled Substance Regulations

7.1 This section details various substance regulations which apply to Siemon products. All materials provided to Siemon must comply with these regulations and the supplier must provide documentation to confirm compliance.

In addition, the supplier is responsible for ensuring that the product complies with the latest version of the legislation listed above. In case of discrepancies between legislation, the more stringent requirement shall apply. The supplier will be asked to



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provide a written statement of compliance using Siemon’s approved form or Siemon’s environmental material compliance platform.

7.2 EU REACH Regulation (1907/2006)

7.2.1 The Siemon Company is responsible for notifying customers if any product produced contains substance identified in the EU REACH Regulation (1907/2006). The "Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)". REACH applies both to substances on their own, and to “articles” that contain substances. (see Appendix A, 6.0 for examples of articles).

<https://echa.europa.eu/regulations/reach/legislation>

7.2.2 Some SVHC’s are listed on the “Candidates for Authorization” <https://echa.europa.eu/candidate-list-table> list within the REACH Regulation. While the use of these substances is not restricted, other requirements for use are mandated. Therefore, it is required that suppliers notify Siemon if they are utilizing any of the Candidate List substances in concentrations greater than 0,1% weight by weight.

7.2.3 Siemon suppliers shall provide Material Data sheet with CAS number as defined in Article 3 (35) to easily identify any article exceeding .1% w/w, regardless the total weight of the finished good. In the absence of providing “full material disclosure” for the materials provided to Siemon, suppliers are required to provide a declaration (see Siemon document Resource Center for Templates) which reflects the status of the materials to the most current revision of the EU REACH Regulation.

7.2.4 REACH Regulation = "Registration, Evaluation and Authorization of Chemicals".

EU REACH Restricted List – Annex XVII:

<https://echa.europa.eu/substances-restricted-under-reach>

EU REACH Authorization List – Annex XIV:

<https://echa.europa.eu/authorisation-list>

7.3 Waste Framework Directive (SCIP): 2008/98/EC

7.3.1 The Waste framework directive is an extension of REACH Regulation. All Siemon purchased components, material, material finishing that can be sold within the EU need to have a REACH full material disclosure (FMD) if the SVHC is above the 0.1% threshold. (see Appendix A, 6.1 for further information). Any product or material purchased by Siemon that contains and SVHC that exceeds the 0.1% threshold shall provide Siemon with a SCIP registration number.

7.4 EU RoHS Directive 2011/65/EU & 2015/863/EU – “Restriction of Hazardous Substances”



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- 7.4.1 The title of the EU RoHS Directive is “Restriction of the use of certain hazardous substances in electrical and electronic equipment.”
- 7.4.2 RoHS applies to all materials provided to Siemon, with the exception as noted in the following exemptions listed below.
<https://rohs.exemptions.oeko.info/index.php?id=127>
- 7.4.3 Item 6: Lead as an alloying element in steel containing up to 0.35% lead by weight, aluminum containing up to 0.4% lead by weight, and as a copper alloy containing up to 4% lead by weight.
- 7.4.4 Item 7: Lead in solders for servers, storage and storage array systems, network infrastructure equipment for switching, signaling, transmission as well as network management for telecommunications.
- 7.4.5 If items used exclusively in SIEMON products which are outside the scope of the EU RoHS Directive (for example, items used solely in Medium Voltage products with a voltage rating above 1000VAC / 1500VDC).
http://ec.europa.eu/environment/waste/rohs_eee/index_en.htm
- 7.4.6 In the absence of providing “full material disclosure” for the materials provided to Siemon, suppliers are required to provide an “declaration” (see Siemon document Resource Center for Templates) which reflects the status of the materials to the most current version of the EU RoHS Directive.

RoHS II (EU Directive 2011/65) and its amendments, includes CE-marking directive. RoHS III (EU Directive 2015/863) adds Category 11 (catch-all) products and adds four new restricted substances - all phthalates. The four phthalates are mainly used as insulation plasticizers and are on the REACH list of SVHC (Substances of Very High Concern). The expanded list for RoHS 3 is thus as follows:
<https://www.rohsguide.com/rohs3.htm>

- Cadmium (Cd): < 100 ppm
- Lead (Pb): < 1000 ppm
- Mercury (Hg): < 1000 ppm
- Hexavalent Chromium: (Cr VI) < 1000 ppm
- Polybrominated Biphenyls (PBB): < 1000 ppm
- Polybrominated Diphenyl Ethers (PBDE): < 1000 ppm
- Bis(2-Ethylhexyl) phthalate (DEHP): < 1000 ppm
- Benzyl butyl phthalate (BBP): < 1000 ppm
- Dibutyl phthalate (DBP): < 1000 ppm
- Diisobutyl phthalate (DIBP): < 1000 ppm

7.5 Russia ROHS Directive: Technical Regulations “EAEU TR 037/2016”

- 7.5.1 Electrotechnical products marketed in the EAEU (Eurasian Economic Union of the countries of Russia, Belarus, Armenia, Kyrgyzstan, Kazakhstan) require a



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confirmation of conformity from March 1, 2020. The confirmation needs to be performed by recognized ISO 17025 3rd party approved lab providing compliance to the Technical Regulations “EAEU TR 037/2016” for the restriction of the use of hazardous substances in electrotechnical and radio electronic products.

7.5.2 The EAEU TR 037/2916 limits the content of the following six substances in electrotechnical and electronic products:

- Lead
- Cadmium
- Mercury
- Hexavalent chrome
- Polybrominated biphenyl
- Polybrominated diphenyl ether

7.5.3 In general, the cadmium concentration in homogeneous materials used in electrotechnical and radio electronic products must not exceed 0.01% by weight. The other five substances must not exceed 0.1% by weight.

The enforcement of the Technical Regulations protects the life and health of people and the environment. Consumers and users can also no longer be misled regarding the content of hazardous substances.

7.5.4 The EAEU TR 037/2016 is to be used for the following devices:

- IT devices
- Cable products
- Telecommunications systems



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7.6 China RoHS Directive: Technical Regulations

7.6.1 China RoHS GB/T-26572, known as the **Administrative Measure on the Control of Pollution Caused by Electronic Information Products (ACPEIP)**, took effect on 1 March 2007.

7.6.2 China RoHS has product marking requirements for the six EU RoHS restricted substances for all applicable products as to whether it is compliant or non-compliant. Disclosure can be at the component or sub-assembly level, but it must be in a prescribed format in Chinese as detailed in "Marking for the control of Pollution Caused by Electronic Information Products". Specifically, a sticker with the Environment Friendly Use Period (EFUP) is applied, which lists the period in years before any of the RoHS substances are likely to cause possible harm to health or the environment. China RoHS also used to be referred to as RPCEP (Regulation for Pollution Control of Electronic Products).

The Ministry of Industry and Information Technology (MIIT) maintains the database of products that are subject to RoHS restrictions. For more information, see [China RoHS vs EU RoHS](#).

7.7 Additional Countries adopting EU RoHS Directive 2011/65/EU

7.7.1 Turkey, Vietnam, India.

7.7.2 Gulf Cooperative States (Kuwait, Saudi Arabia, Bahrain, United Arab Emirates, Oman, Qatar).

7.8 Conflict Minerals

7.8.1 The Siemon Company is responsible for reporting on Conflict Minerals to the SEC. While these minerals are not considered "hazardous", they require reporting under US SEC Dodd- Frank Act requirements. Under the US regulation for "conflict minerals", the minerals of concern are:
<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/> in addition the EU adopted the conflict minerals legislation per: Regulation (EU) 2017/821:

<https://eur-lex.europa.eu/eli/reg/2017/821/oj/eng>

- Cassiterite (tin)
- Wolframite (tungsten)
- Coltan (tantalum)
- Gold
- Cobalt
- Mica



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7.8.2 Document Reporting

The document will declare that Siemon products contain one or more conflict minerals and that these minerals are necessary to the functionality of the products manufactured. The document certifies that all Siemon products are declared “DRC conflict free”.

<https://www.sec.gov/opa/Article/2012-2012-163htm---related-materials.html>

7.9 Additional Countries adopting Conflict Minerals reporting.

7.9.1 From 1 January 2021, EU importers of tin, tantalum, tungsten, and gold will have to carry out due diligence on their supply chain. In other words, they will have to check where the minerals and metals they import have been mined and processed responsibly. This is to make sure the minerals and metals they are buying or selling are not funding armed groups or security forces in areas of conflict. The new EU Conflict Minerals Regulation includes a list of the minerals and metals covered. This Regulation does not apply to:

- EU importers who import less than a certain amount
- Recycled metals or stocks created before 1 February 2013.

The regulation covers both individuals and companies.

<http://www.oecd.org/daf/inv/mne/mining.htm>

7.10 Ozone Depleting Substances (ODS):

7.10.1 The Siemon Company is responsible for notifying customers if any product produced was manufactured using Ozone Depleting Substances. In the thirty years since Congress amended the Clean Air Act (CAA) to add Title VI: Stratospheric Ozone Protection, EPA has worked with many partners to develop and implement flexible, innovative, and effective approaches to [phase out ozone-depleting substances \(ODS\)](#) and heal the ozone layer.

7.10.2 Ozone-depleting substances have been used in many household, industrial, and military applications. In response to significant concern for our ozone layer, through the [Montreal Protocol](#) and CAA Title VI, the United States has been substituting ODS with [safer alternatives](#). At the same time, global demand for refrigeration and cooling technologies continues to expand.

<https://www.epa.gov/ozone-layer-protection/ozone-depleting-substances>

7.10.3 Regulation (EC) No 1005/2009 of the European Parliament and of the Council of 16 September 2009 on substances that deplete the ozone layer (Text with EEA relevance) Prohibits / restricts the use of Ozone Depleting Substances (ODS) in accordance with the Montreal Protocol.



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<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32009R1005>

7.11 Persistent Organic Pollutants (POPS)

7.11.1 The Siemon Company is responsible for notifying customers if our products are Free from Toxic chemicals that adversely affect human health and the environment around the world. ... They persist for long periods of time in the environment and can accumulate and pass from one species to the next through the food chain.

Prohibits/restricts the use of Persistent Organic Pollutants (POPS) in accordance with the UNECE Protocol and the Stockholm Convention

<https://www.epa.gov/international-cooperation/persistent-organic-pollutants-global-issue-global-response>

7.11.2 The Community is strongly committed to the effective implementation of these two environmental agreements. [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019R1021&from=EN 2004](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019R1021&from=EN%202004) (regulation EU 2019/1021) complements earlier Community legislation on POPs and aligns it with the provisions of the international agreements on POPs. To a certain extent the Regulation goes further than the international agreements emphasizing the aim to eliminate the production and use of the internationally recognized POPs.

https://ec.europa.eu/environment/chemicals/international_conventions/index_en.htm

7.12 Toxic Substances Control Act (TSCA)

7.12.1 The Siemon Company is responsible for notifying customers the United States Environmental Protection Agency (EPA) published the final rules under Section.6(h) of the Toxic Substances Control Act (TSCA) for five Persistent, Bio-accumulative, and Toxic (PBT) chemicals. These rules were promulgated on January 21, 2021, and were effective as of February 5, 2021.

7.12.2 Details regarding the final rules can be found here:
<https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/persistent-bioaccumulative-and-toxic-pbt-chemicals-under>.

7.12.3 These rules limit or prohibit the manufacture (including importing), processing, and/or distribution in commerce of the following chemicals:

1. Decabromodiphenyl ether (DecaBDE) (CAS No. 1163–19–5)
2. Phenol, isopropylated phosphate (3:1) (PIP (3:1)) (CAS No. 68937–41–7)
3. 2,4,6-Tris(tert-butyl) phenol (2,4,6-TTBP) (CAS No. 732-26-3)
4. Hexachlorobutadiene (HCBD) (CAS No.87–68–3)
5. Pentachlorothiophenol (PCTP) (CAS No.133-49-3)



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7.12.4 Additional Materials banned per TSCA directive:

- Asbestos
- Lead (in paint and paint waste)
- Polychlorinated biphenyls (PCBs)
- Dioxins
- Chlorofluorocarbons (CFCs)
- Metallic mercury (in consumer products)
- Formaldehyde
- Nitrites (in metalworking fluids)
- Hexavalent chromium compounds (on metals used in water treatment)

7.12.5 PFAS: polyfluoroalkyl substances

In July 2020, EPA issued a final rule strengthening the regulation of PFAS by requiring notice and EPA review before the use of long-chain PFAS that have been phased out in the United States could begin again.

Toxic Substances Control Act (TSCA), as amended by the 2016 Frank R. Lautenberg Chemical Safety for the 21st Century Act, EPA will be prohibiting parties from manufacturing, processing, or importing products containing certain long-chain PFAS without prior EPA review and approval.

7.13 EU Packaging Directive 94/62/EC

7.13.1 The Packaging and packaging waste directive (PPWD) requires Member States to take steps to prevent packaging waste by reducing waste both in terms of quantity and hazard. Recently, portions of the PPWD were amended by Directive 2004/12/EC of Feb. 11, 2004, which must be adopted into the national legislation of all EU Member States by Aug. 18, 2005. The main amendments imposed by Directive 2004/12/EC:

7.13.2 Article 9 of the PPWD requires all packaging placed on the EU market to comply with three "essential requirements" set forth in Annex II of the Directive.

1. Source Reduction: the packaging weight and volume should be limited to the minimum adequate to maintain the necessary level of safety, hygiene, and acceptance for the product and the consumer.
2. Minimum Presence of Hazardous Substances: the packaging should be manufactured in such a way as to minimize the presence of hazardous substances in emissions, ash, or leachate when packaging or packaging waste is incinerated or landfilled; and,



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3. Recovery, Reuse, and Recycling: the packaging should be designed, produced, and commercialized in such a way as to permit its reuse or recovery, including recycling, and to minimize its impact on the environment when packaging waste is disposed.

<https://ec.europa.eu/environment/waste/packaging/legis.htm>

Note that packaging materials are also subject to regulations such as REACH, ODS, POP's.

7.14 EU Batteries Directive (2006/66/EC)

7.14.1 The EU [legislation](#) on waste batteries is embodied in the [Batteries Directive](#). It intends to contribute to the protection, preservation, and improvement of the quality of the environment by minimizing the negative impact of batteries and accumulators and waste batteries and accumulators. It also ensures the smooth functioning of the internal market by harmonizing requirements as regards the placing on the market of batteries and accumulators. With some exceptions, it applies to all batteries and accumulators, no matter their chemical nature, size, or design.

- Includes restrictions for hazardous substances in batteries.
- Note that batteries may also be subject to RoHS restrictions in other regions, such as China.
- Lithium: Though not regulated by environmental directives, the presence of 0.3g or more of Li in a product may result in shipping restrictions
- Mercury
- Cadmium

<https://ec.europa.eu/environment/waste/batteries/index.htm>

7.15 CA Proposition 65

7.15.1 The Siemon Company is responsible for notifying customers with a WARNING statement in the state of California if a product contains any chemical found in the attached list from the Office of Environmental Health Hazard Assessment (OEHHA); <https://oehha.ca.gov/proposition-65/proposition-65-list>.

7.15.2 Proposition-65 is a California Safe Drinking Water Law, that affects all consumer products sold or distributed in California, including textiles, footwear, hard goods, DIY products, toys, juvenile products, stationery, electrical/electronic items and more. Proposition-65 requires the state to maintain and update a list of chemicals known to the state to cause cancer or reproductive toxicity. (see Appendix A, 6.2 for further information).



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7.16 Environmental, Social and Governance

- 7.16.1 The Siemon Company is responsible for collecting and reporting on environmental, social, and corporate governance (ESG) that are part of the Sustainable Development Goals outlined by the UN Global Compact. <https://unglobalcompact.org>. Siemon will be using ToxNot survey to collect ESG information on an annual basis.
- 7.16.2 Environmental aspect: Data is reported on climate change, greenhouse gas emissions, biodiversity loss, deforestation/reforestation, pollution mitigation, energy efficiency and water management.
- 7.16.3 Social aspect: Data is reported on employee safety and health, working conditions, diversity, equity, and inclusion, and conflicts and humanitarian crises, and is relevant in risk and return assessments directly through results in enhancing (or destroying) customer satisfaction and employee engagement.
- 7.16.4 Governance aspect: Data is reported on corporate governance such as preventing bribery, corruption, Diversity of Board of Directors, executive compensation, cybersecurity and privacy practices, and management structure.