

Statement regarding compliance with the Waste Electrical and Electronic Equipment (WEEE) Directive 2012/19/EU

The WEEE Directive is aimed at reducing the amount of waste electrical and electronic equipment destined for landfill and places certain responsibilities on “producers” and “distributors” of electrical and electronic equipment (EEE).

In the WEEE Directive a “PRODUCER” is defined as: Any person who, irrespective of the selling technique used:

- Manufactures and sells EEE under his own brand.
- Resells under his own brand equipment produced by other suppliers.
- Imports or exports EEE on a professional basis into a Member State.

A **DISTRIBUTOR** is a business that sells EEE to consumers (not businesses), either direct from shops or indirect through the internet or catalogues.

Phase One Electronics Ltd is not classified as a “producer” or “distributor” as it only assembles PCB’s and other electronic / electrical goods in accordance with its customers’ own specifications. Therefore, Phase One Electronics does not need to register and comply with a **Producer Compliance Scheme** or a **Distributor Takeback Scheme**. However, Phase One Electronics still has responsibilities for ensuring the final disposal of all of its WEEE is carried out responsibly in accordance with the various waste regulations including the Waste Electrical and Electronic Equipment Regulations and Hazardous Waste Regulations as amended. To that end all WEEE regardless of its original purpose is segregated from other forms of waste and disposed using an appropriately licenced waste carrier. Records of waste transfers are maintained.

Statement regarding compliance with the RoHS Directive 2011/65/EU commonly referred to as RoHS 2

The RoHS Directive 2011/65/EU (the RoHS2 Directive) and its subsequent amendment by Directive 2015/863 restrict the amount of certain substances deemed environmentally hazardous within electrical and electronic equipment. These substances are:

- Cadmium (Cd): 0.01%.
- Mercury (Hg): 0.1%.
- Lead(Pb): 0.1%.
- Hexavalent chromium (Cr6+): 0.1%.
- Polybrominated biphenyls (PBB): 0.1 %.
- Polybrominated diphenyl ethers (PBDE): 0.1 %.
- Bis(2-Ethylhexyl) phthalate (DEHP): 0.1% (added in 2015).
- Benzyl butyl phthalate (BBP): 0.1% (added in 2015).
- Dibutyl phthalate (DBP): 0.1% (added in 2015).
- Diisobutyl phthalate (DIBP): 0.1% (added in 2015).

Phase One Electronics only assembles printed circuit boards and other electrical and electronic products in accordance with its customers’ specifications and therefore for our business ensuring RoHS 2 compliance means that:

- Suppliers of products, materials and components are required to comply with RoHS regulations unless stated otherwise on our purchase orders.
- Non-RoHS components will only be purchased if this has been specified by our customer.
- We will advise our customers if their specifications are deemed not to be RoHS compliant.
- We control our manufacturing processes to ensure RoHS and non-RoHS products, materials and components are segregated at all stages of storage and production to prevent inadvertent non-RoHS contamination.
- We train our staff to understand RoHS requirements and our RoHS compliance controls.

Our processes and procedures are periodically checked to verify continuing compliance with the RoHS Directive and our internal RoHS controls.

Statement regarding compliance with the REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) – EC 1907/2006

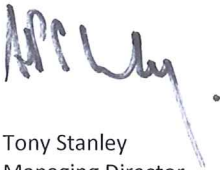
REACH is a European Community Regulation on chemicals and their safe use (EC 1907/2006). It deals with the Registration, Evaluation, Authorization and Restriction of Chemical substances. The REACH law entered into force on 1 June 2007.

The aim of REACH is to simplify EU Chemical laws and to protect human health and the environment from the risks of chemicals and applies within the territory of the European Union. It places greater responsibility on industry to manage the risks from chemicals and to provide safety information on the substances.

As part of our ongoing compliance commitment, we have checked if any substances of very high concern (SVHC's), meeting the criteria set out in Article 57 of REACH and included on the **REACH "Candidate List"** (*last amended Jan 2021*) are contained within the products we supply our customers and in what concentrations. As a result, we have received no notification of any breach to the regulation and we confirm that, to the best of our knowledge, the products we currently supply do not contain any SVHC's included on the Candidate List in concentrations above 0.1 % (w/w) and are compliant with Annex XVII restrictions.

To ensure we continue to fulfil our obligations to keep our customers informed Phase One Electronics Ltd will:

- Require suppliers to provide updated Safety Data Sheets and REACH Compliance statements if any products that contain SVHC are in concentrations above 0.1% (weight/weight).
- Continue to monitor the Candidate List of substances of very high concern (SVHC) to ensure that additions to the list are evaluated with respect to our products.



Tony Stanley
Managing Director
April 2021