REACH Compliance Policy

1. Purpose The purpose of this policy is to Establish Aimtron' s standard process for communicating REACH status internally as well as to our customers against the products and materials manufactured, sold, or supplied by Aimtron comply with the European Union's REACH Regulation (EC 1907/2006). This regulation governs the use of chemicals, ensuring that substances do not pose a risk to human health or the environment.

2. Scope This policy applies to all products and materials manufactured or supplied by Aimtron that are placed in the European Union or may enter the EU market, as well as any activities involving the use of chemicals. This includes raw materials, components, and finished products.

3. Definitions

- **REACH**: Registration, Evaluation, Authorization, and Restriction of Chemicals.
- **Substance**: A chemical element and its compounds, as well as natural substances.
- **Article**: A product that is shaped or designed to fulfil a specific function that does not change during use (e.g., a plastic casing).
- **SVHC (Substances of Very High Concern)**: Chemicals that are considered a risk to human health or the environment.
- **C of C**: Certificate of Compliance
- **Aimtron** refers to **Company**

4. Compliance Obligations

- **Conformance**: Any chemicals used in the company's products, whether in raw materials, components, or formulations, are ensured to comply with the European Chemicals Agency (ECHA).
- **Notification**: When come to know by company, if substances present in products are included in the Candidate List of Substances of Very High Concern (SVHC), the company will inform / provide this information to customers.
- **Evaluation**: To ensure the compliance, the company will rely on the supplier 's declaration, material test certificates and other necessary documentation provided against the product and material supplied to the company.
- **Authorization**: Avoid the use of substances of very high concern (SVHC) unless authorised. Also, the company will work to replace with safer alternatives in line with REACH requirements.
- **Restriction**: The company will ensure that any substances restricted under REACH are not used in its products beyond the prescribed limits.

5. Policy

- **Purchase Order Requirement Identification**

  Aimtron' s standard Purchase Order shall include verbiage to the effect of REACH requirements. Suppliers are required to indicate if any items on this Purchase Order do not comply with the current revision EU directive or the most recent SVHC candidate list of the REACH directive.

- **REACH Certificate of Compliance**

  Aimtron may release a REACH Certificate of Compliance if the following criteria meet:

  All Components are REACH Compliant
  All Processes used during manufacturing are REACH Compliant
  Aimtron is required to alert Customers if an Assembly contains non-REACH compliant items or processes, even in cases where no Certificate is desired.

6. Communication and Transparency

- **Supplier Communication**: The company will request declarations from its suppliers to confirm that the chemicals and materials provided comply with REACH.
- **Customer Communication**: The company will inform customers if any products contain substances from the SVHC list in concentrations above 0.1% by weight, as required by REACH.
- **Internal Awareness**: Employees involved in procurement, product development and process design, manufacturing, and quality assurance will receive regular awareness training on REACH compliance and its requirements.

7. Non-Compliance and Corrective Actions

- **Corrective Action Plans**: If any product or material is found to be non-compliant with REACH, the company will take necessary corrective action. This may involve:
  - Substituting the non-compliant material with an authorized part
  - Recalling or rework products found to be non-compliant.
  - Informing relevant authorities and customers about the issue.
- **Supplier Management**: If a supplier fails to meet REACH compliance standards, corrective measures will be taken, which may include switching suppliers or working with them to ensure compliance.

8. Conclusion The company is committed to ensuring that all products manufactured, sold, or supplied are in full compliance with the REACH Regulation to protect human health and the environment. The company will continuously monitor and adapt to any changes in the regulation to maintain compliance and reduce the environmental impact of its products.