1. Purpose This policy outlines Aimtron' s commitment that all products and materials manufactured, sold, or supplied by Aimtron comply with the European Union's ROHS Directive (2015/863/EU) and any other related regulations. This is to restrict the use of hazardous substances in electronic and electrical equipment.

2. Scope This policy applies to all products manufactured or supplied by Aimtron that fall within the scope of the ROHS Directive. This includes products placed within the EU market, as well as those manufactured by the company for sale in other global markets where ROHS regulations apply.

3. Definitions

- **ROHS**: Restriction of Hazardous Substances.
- **Hazardous Substances**: The directive limits the use of certain substances in electrical and electronic equipment. There are ten (10) substances that are restricted from use in excess of the noted limits below
    - Lead (Pb) (0.1 %)
    - Mercury (Hg) (0.1 %)
    - Cadmium (Cd) (0.01 %)
    - Hexavalent chromium (Cr VI) (0.1 %)
    - Polybrominated biphenyls (PBB) (0.1 %)
    - Polybrominated diphenyl ethers (PBDE) (0.1 %)
    - Bis(2-ethylhexyl) phthalate (DEHP) (0.1 %)
    - Butyl benzyl phthalate (BBP) (0.1 %)
    - Dibutyl phthalate (DBP) (0.1 %)
    - Diisobutyl phthalate (DIBP) (0.1 %)
- **Aimtron** refers to **Company**

4. Compliance Obligations

- **Material Control**: The company ensures that materials used in the production of electronic assemblies and electrical products are free of the restricted substances in the quantities specified by the EU ROHS Directive.
- **Suppliers**: Suppliers are required to provide material declarations to confirm that the components and materials they supply are compliant with ROHS regulations.

- **Final Product**: Certificate of Compliance shall be provided against the product supplied by the company to certify that supply is complaint with ROHS regulation based on the information from the supplier sources and compliance reports.

5. Product Development and Process

- **Production/ Process**: The company's product development team will incorporate ROHS compliance into the process design and product development, selecting materials and components that do not contain hazardous substances.
- **Verification**: During the engineering activity in the development phase and prototype stages, verification methods, such as material certifications or laboratory testing, whichever applicable and suitable will be employed to confirm that the product meets ROHS compliance standards.

6. Documentation/ Certification

- **Declarations of Conformity**: A Declaration of Conformity/ Certificate of Compliance will be provided for each product model to verify compliance with ROHS standards. This documented certificate will be issued against the supply and readily accessible for buyer and by regulatory authorities.
- **Supplier Certification**: Suppliers must provide certifications or test reports verifying that their products / materials comply with the ROHS Directive. These documents will be retained for limited period by the company for reference and audit purposes.

7. Training and Awareness All employees involved in the product development, process design, manufacturing, and quality assurance processes will be regularly trained on ROHS compliance to ensure the continued quality and safety of products. Suppliers will also be informed about the company's ROHS requirements.

Personnel working on RoHS assemblies shall do so in a manner that inhibits the contamination of the assemblies from the above listed substances in 3.0. This involves keeping the restricted substances segregated from the designated RoHS workstations. Designated RoHS areas are to be identified by signage which should state, "This is a RoHS / Lead Free only workstation" or product or similar.

Assemblies which are NOT designated as RoHS assemblies should be worked on in designated workstations identified by signage which should state, "This is a Lead only workstation" or similar.

Equipment and supplies assigned to a designated "RoHS" workstation/area should not be moved to a "Non-RoHS" area or visa versa. A good practice is to identify applicable equipment and supplies, especially equipment such as soldering irons, to their respective "Non-RoHS/Lead" workstation/area as most of Aimtron' s customers require usage of RoHS/Lead-Free solder.

8. Non-Compliance and Corrective Actions Any non-compliant products identified will be addressed through corrective actions, which may include:

- Supplier recall or replacement of non-compliant components.
- Rework or redesign of products to eliminate non-compliant materials.
- Where applicable, Immediate reporting and resolution with the necessary regulatory bodies.

9. Communication and Transparency

- **Internal Communication**: Regular communication within the company to ensure ROHS compliance is understood and followed by all relevant departments.
- **External Communication**: Transparency with customers, suppliers, and regulators regarding the company's commitment to ROHS compliance and product safety.

10. Conclusion The company is committed to ensuring that all products are manufactured in compliance with the ROHS Directive to protect human health and the environment by minimizing the presence of hazardous substances in electronic assemblies, electrical equipment and other electronics related products.

**End of the Document **