

| | | | |
|----------------------------|---------------------------------|---|--|
| Document RoHS directive | Type of document Instructive | Examined by Corporate Quality & Sustainability Director | Document responsible Supply Chain Responsibility Mgr |
| Document number 2014008 | Revision 4 | Date 2022-12-01 | Approved by Chief Procurement Officer |

Compliance policy EU RoHS directive

Electrical and electronic equipment containing health and hazardous substances may constitute a risk to human health and the environment, particularly in the handling of waste. RoHS directive aims to reduce the risks by replacing or restrict usage of some specific health and hazardous substances in electrical and electronic equipment with less dangerous alternatives or alternative technologies (see list of substances in Annex II of RoHS directive 2011/65/EU and directive 2015/863/EU).

The original RoHS directive (2002/95/EC) came into force 2006. RoHS directive (2011/65/EU), also known as RoHS2, applies from 2 January 2013. The RoHS2 directive has been extended to all electrical and electronic equipment (EEE), including medical devices, monitoring and control instruments and EEE products not covered by the top ten categories (eleventh equipment category), unless specifically excluded. RoHS 3 (2015/863/EU) applies from 22 July 2019. RoHS 3 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).

RoHS directive covers categories below

1. Large household appliances
2. Small household appliances
3. IT and telecommunications equipment
4. Consumer equipment
5. Lighting equipment
6. Electrical and electronic tools
7. Toys, sports and leisure products
8. Medical products
9. Monitoring and control instruments including industrial monitoring and control instruments
10. Vending machines
11. Other electrical and electronic equipment which is not covered by any of the above categories.

Directive applies from

| 1 July 2006 | 22 July 2014 | 22 July 2016 | 22 July 2017 | 22 July 2019 |
|----------------|--------------|------------------|------------------------|---|
| Category 1 - 7 | Category 8 | Equipment for in | Industrial control and | All other equipment |
| Category 10 | Category 9 | vitro-diagnostic | monitoring instruments | (including category11) Extension exemption: Medical devices apply 22 July 2021 |

NOTE's responsibility

Unless otherwise specified by the customer, NOTE assume that the products ordered by the customer is covered by the RoHS directive.

NOTE is responsible for direct production materials used in the processes for the manufacturing of customer's products is complying with RoHS directive. With direct production material means material that is not included in the product and/or not specified by the customer in products specification, such as liquid cleaners, lubricants, solder paste etc. For active materials, i.e. materials that the customer specified in product specification, NOTE follow the customer specification.

In cases where the customer has not specified a particular brand but leaves it to NOTE choosing brands, NOTE shall select components that meets RoHS directive.

Unless RoHS approved alternative exists, NOTE shall before NOTE-selects a component that does not comply with RoHS directive, first inform and obtain a written approval (exemption) from the customer.

Customer's responsibility

NOTE manufactures products on behalf of and in accordance with the customer's documents/specifications, which means that the customer has primary responsibility to ensure that the products and components specified in accordance with the RoHS directive, where the requirement exists.

NOTE is responsible for informing the customer about the attention to discrepancy or ambiguity found in the customer's specifications in terms of the ability to comply with the RoHS directive or if NOTE obtains information from the supplier or manufacturer of the changes in the components' status in relation to the RoHS directive.