

RMT-VA-A-U337-07-150222 ROHS, REACH, SCIP and Conflict Mineral Policy

ROHS, REACH and Conflict Mineral Policy of Reinhardt Microtech GmbH a unit of CICOR

As a contract manufacturing company with the majority of its customers in the European Union REINHARDT MICROTECH GMBH is fully aware of the requirements and its legal obligations regarding the following regulations:

- **ROHS 2011/65 (Annex II according to 2015/863)**
- **REACH 1907/2006 (SVHC-list effective as of 17.01.2022 (223 substances))
Waste Framework Directive (SCIP) Request**
- **Dodd-Frank Wallstreet Reform Act Section 1502 (Conflict Minerals)**
- **Waste Framework Directive (SCIP)**

REINHARDT MICROTECH GMBH has identified its roles and obligations regarding the individual regulations to the best of its knowledge, and implemented the necessary steps to fulfill its obligations on behalf of its own and our customers.

1 ROHS Regulation 2011/65 (2015/863)

As a manufacturer in the electronics and electronic equipment industry, REINHARDT MICROTECH GMBH is committed to conducting business in a manner that respects, preserves, and improves the environment.

As a contract manufacturer providing manufacturing services to our customers REINHARDT MICROTECH GMBH has set up its supply chain and its processes to conform completely to the ROHS directive. With the exception of explicit customer demand to the contrary, all products manufactured and delivered by REINHARDT MICROTECH GMBH do therefore fully comply to the ROHS directive and do not contain any of the substances listed below by more than 0,1W% (respectively 0,01W% for Cd).

- **Lead**
- **Mercury**
- **Cadmium**
- **Hexavalent chromium**
- **Polybrominated byphenyls (PBB)**
- **Polybrominated diphenyl ether (PBDE)**
- **Bis(2-ethylhexyl) phthalate (DEHP)**
- **Butyl benzyl phthalate (BBP)**
- **Dibutyl phthalate (DBP)**
- **Diisobutyl phthalate (DIBP)**

If required by the customer REINHARDT MICROTECH GMBH will issue ROHS declarations for the delivered products.

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2 REACH Regulation (EU) 1907/2006

The REINHARDT MICROTECH GMBH is a unit of Cicor, a contract manufacturer of electronic products and therefore, according to the terms of the REACH directive, a so called “Down-Stream” user of products and components.

You receive from us exclusively non-chemical products, which in their intended and foreseeable use do not emit any substances.

Therefore REINHARDT MICROTECH GMBH is not subject to any obligations regarding the registration of substances or the issue of safety data sheets for its products. (Article 7)

Regardless of the above and in the interest of its customers REINHARDT MICROTECH GMBH has implemented the necessary steps towards its supply chain to fulfill its obligation regarding the supplier information duty outlined in the Article 33 of the REACH Regulation.

REINHARDT MICROTECH GMBH requires its suppliers to forward information about the use and content of “Substances of Very High Concern” in the articles and products delivered to REINHARDT MICROTECH GMBH.

REINHARDT MICROTECH GMBH will inform its customers unsolicited if the products delivered by us contain any of the substances listed in the candidate list of the European Chemical Agency (ECHA SVHC-list effective as of 17.01.2022 (223 substances)). The only exception is explicit customer demand for products with solder balls containing lead.

If this should be the case, REINHARDT MICROTECH GMBH will provide our customers with possible alternatives for the affected parts or processes.

If required by the customer REINHARDT MICROTECH GMBH will issue REACH declarations for the delivered products.

3 Dodd-Frank Wallstreet Reform Act Section 1502 (Conflict Minerals)

REINHARDT MICROTECH GMBH is headquartered in Germany and is not registered in any US stock exchange markets. Also REINHARDT MICROTECH GMBH has no production facilities in the territory of the United States of America.

Therefore REINHARDT MICROTECH GMBH has no direct legal obligation regarding the rules regarding the use and the restrictions of minerals from the regions outlined in the Section 1502 of the Dodd-Frank act.

As a socially responsible company with clear ethical standards, REINHARDT MICROTECH GMBH nonetheless supports the rules outlined in the Section 1502.

REINHARDT MICROTECH GMBH requires its suppliers to review their supply chain in regard to the use of “Conflict Minerals” according to the Dodd-Frank act, and to inform REINHARDT MICROTECH GMBH if materials from the conflicted areas are used in the products delivered to REINHARDT MICROTECH GMBH.

If such a case should arise REINHARDT MICROTECH GMBH will subsequently inform its customers to this fact, and will, wherever possible, provide alternatives for the affected articles or materials.

4 Waste Framework Directive (WFD), SCIP Database

As part of the implementation of the EU’s action plan for the circular economy adopted in 2015, the revised Waste Framework Directive entered into force in July 2018. It gave ECHA the task to develop a database with information on articles containing substances of very high concern (SVHCs) on the Candidate List. New substances are regularly added to the Candidate List under REACH.

Companies that produce, import or supply articles containing Candidate List substances have to submit information on these articles placed on EU market to the SCIP database, as from 5 January 2021. These articles can be produced in the EU or imported from non-EU countries.

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REINHARDT MICROTECH GMBH, as follower of the REACH Regulation (EU) 1907/2006, shown in chapter 2 of this declaration, has no need to own an account at the SCIP (**S**ubstances of **C**oncern **I**n **P**roducts) database at the moment.

Regardless of the above REINHARDT MICROTECH GMBH has an account at the SCIP Database to do entries as customer requirements require this.

REINHARDT MICROTECH GMBH will do entries and inform customers unsolicited if the products delivered by us contain any of the substances listed in the candidate list of the European Chemical Agency (ECHA SVHC-list effective as of 17.01.2022 (223 substances)).

Uwe Keim
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