

ROHS, REACH and Conflict Mineral Policy of Swisstronics Contract Manufacturing AG (“Swisstronics”)

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

- **ROHS 2011/65 and EU 2015/863**
- **REACH 1907/2006**
- **Dodd-Frank Wallstreet Reform Act Section 1502 (Conflict Minerals)**

SWISSTRONICS 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 and EU 2015/863

As a manufacturer in the electronics and electronic equipment industry, SWISSTRONICS 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 SWISSTRONICS 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 SWISSTRONICS do therefore fully comply with the ROHS directive and do not contain any of the substances listed below by more than 0,1W%.

- **Lead**
- **Mercury**
- **Cadmium**
- **Hexavalent Chromium**
- **Polybromated byphenils (PBB)**
- **Polybromated Diphenyl Ethers (PBDE)**

	Datum	Name		Datum	Name		Datum	Name
Erstellt	08.05.2018	Senn, Robin	Geprüft	08.08.2019	Kuenzle, Erich	Freigabe	08.08.2019	Senn, Robin
Swisstronics				Dokumentennummer AW4-7-15			Version: 4	
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- Di(2-ethylhexyl)phthalat (DEHP)
- Butylbenzylphthalat (BBP)
- Dibutylphthalat (DBP)
- Diisobutylphthalat (DIBP)

On customer demand SWISSTRONICS will issue ROHS certificates for the delivered products.

2 REACH Regulation (EU) 1907/2006

SWISSTRONICS is 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.

SWISSTRONICS delivers exclusively non-chemical products, which in their intended and foreseeable use do not emit any substances.

Therefore SWISSTRONICS 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 SWISSTRONICS 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.

SWISSTRONICS requires its suppliers to forward information about the use and content of "Substances of Very High Concern" in the articles and products delivered to SWISSTRONICS.

SWISSTRONICS will inform its customers if the products delivered by us contain any of the substances listed in the candidate list of the European Chemical Agency (ECHA).

If this should be the case, SWISSTRONICS will support our customers in finding possible alternatives for the affected parts or processes.

On customer demand SWISSTRONICS will issue REACH certificates for the delivered products.

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

SWISSTRONICS is headquartered in Switzerland and is not registered in any US stock exchange markets. Also SWISSTRONICS has no production facilities in the territory of the United States of America.

Therefore SWISSTRONICS has no direct legal obligation regarding the rules about 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, SWISSTRONICS nonetheless supports the rules outlined in the Section 1502.

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SWISSTRONICS 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 SWISSTRONICS if materials from the conflicted areas are used in the products delivered to SWISSTRONICS .

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

Bronschhofen, 08.08.2019


Erich Kuenzle
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Swisstronics Contract Manufacturing AG

Robin Senn
Head of Quality, Environment and Safety
Swisstronics Contract Manufacturing AG


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