

## REACH Compliance Policy

Azego is committed to supporting our customer's needs for electronic component products and information required to comply with emerging international environmental legislation.

The European Union's REACH Directive (EC 1907/2006) imposes requirements for the Registration, Evaluation and Authorization of Chemical substances and products sold in the EU countries. REACH directive requirements will be implemented over the next 10 years and have the force of law in EU countries. The REACH process will review some 30,000 chemical substances and register and restrict those that are determined to pose specific carcinogenic and reproductive health risks to humans. Preregistration for chemical "Substance" manufacturers and importers began earlier this year.

On June 25<sup>th</sup> 2020 the European Chemicals Agency (ECHA) added 4 additional chemical substances to the Controlled List of Substances of Very High Concern (SVHC). With the updated publication of the SVHC list suppliers of articles are required to inform the recipients of the presence of SVHC's included in the candidate list above a concentration of 0.1% weight by weight (w/w). Article suppliers have to provide their recipients with sufficient information available to them to allow safe use, including, as a minimum, the name of the substance.

Links for REACH Directive details and related information may be found at the end of this document.

Azego's role in this process:

1. As a Distributor of electronic components, Azego does not purchase, use, or distribute "Substances" as defined by the REACH Directive, and as such we have no obligation to "register substances" with ECHA.
2. As a Distributor of electronic components ("Articles" by definition under REACH), we do have an obligation to pass through SVHC content information from Electronic Component Manufacturers to Customers as that information is made available to us.
3. We have forwarded the REACH Directive information and the list of current SVHC's to our franchised component manufacturers and we have requested that they provide SVHC content information to us and to post that information on their Websites for direct customer access.
4. There are no approved formats for substance reporting in "Articles" (such as electronic components) yet. We are working with the IPC, other ECIA member distributors, component manufacturers and customers to develop alignment and standardization for managing information flow in the supply chain.
5. Upon requests from customers, Azego will pass through chemical content information in the format received from component manufacturers. This provides customers with the traceability and authenticity of declarations made by the original manufacturers. Azego cannot transcribe information into customer specific reporting and certification formats for liability reasons. We believe that customers are better served by having the original manufacturer documents.
6. Azego will notify customers of compliance updates, as received from original component Manufacturers, using our Product Change Notification Service.

This will continue to be an evolving issue. The challenge for supply chain members is to continue to learn about and comply with emerging environmental legislation while managing the costs and marketability of our products. We will make every effort to keep customers informed and help in any way possible.

The following information links may be helpful in the short term:

1. What is REACH? <http://echa.europa.eu/web/guest/regulations/reach/understanding-reach>
2. REACH Directive <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1907&from=EN>
3. REACH Guidance Document for Downstream Users <http://echa.europa.eu/web/guest/regulations/reach/downstream-users>
4. ECHA SVHC List (Updated June 25, 2020) [http://echa.europa.eu/chem\\_data/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/candidate_list_table_en.asp)

Signed  
For Azego

A handwritten signature in black ink, appearing to be 'Steve Dopson', written over a horizontal line.

**Mr Steve Dopson**

1<sup>st</sup> December 2020