

# RoHS and REACH Compliance Declaration

**Date: January 14, 2017**

Dear valued Southco customer,

Southco is dedicated to serving you by providing high quality engineered access hardware solutions that meet environmental regulations, including EU Directive 2002/95/EC and subsequent amendments of the European Parliament and of the Council of the use of certain hazardous substances in electrical and electronic equipment (EEE) and REACH (Registration, Authorisation and Restriction of Chemicals, European Union Regulation (EC) 1907/2006). We are providing you the following information to assist you in meeting your environmental policies and procedures.

## RoHS Compliance

- Southco has been producing parts that are RoHS compliant for the last several years. A majority of Southco products are RoHS compliant. All Southco products that are compliant with the RoHS Directive (EU Directive 2002/95/EC and subsequent amendments) are marked “RoHS COMPLIANT.” RoHS COMPLIANT means that the substances restricted by the EU Directive 2002/95/EC and subsequent amendments of the European Parliament are not contained in a finished product above threshold limits stated below unless the restrictive substance is subject of an exemption contained in the RoHS Directive. Southco consider the amendment to Annex II, dated March 31, 2015. The Amendment to Annex II, dated March 31, 2015 additionally restricts the use of DEHP, BBP, DBP and DIBP in Electrical and electronic equipment and becomes effective **July 22, 2019** Southco cannot guarantee that inventory held by distributors or other third parties is RoHS compliant.

| Restricted Substance                  | Maximum Threshold Limit |
|---------------------------------------|-------------------------|
| Cadmium and its compounds             | 100 ppm (0.01 weight %) |
| Mercury and its compounds             | 1000 ppm (0.1 weight %) |
| Hexavalent chromium and its compounds | 1000 ppm (0.1 weight %) |
| Lead and its compounds *              | 1000 ppm (0.1 weight %) |
| Polybrominated biphenyls (PBB)        | 1000 ppm (0.1 weight %) |
| Polybrominated diphenyl ethers (PBDE) | 1000 ppm (0.1 weight %) |
| Bis(2-Ethylhexyl) phthalate (DEHP)    | 1000 ppm (0.1 weight %) |
| Benzyl butyl phthalate (BBP)          | 1000 ppm (0.1 weight %) |
| Dibutyl phthalate (DBP)               | 1000 ppm (0.1 weight %) |
| Diisobutyl phthalate (DIBP)           | 1000 ppm (0.1 weight %) |

\*\*Except when allowed by the Directive. For example, 3500 ppm in steel, 4000 ppm in aluminum alloys and 40000 ppm in copper alloys.

- Certain customers require parts that are not RoHS compliant. Southco produces these parts but their manufacturing, storage and handling is completely segregated from the RoHS compliant parts to minimize contamination of the RoHS compliant products.
- The compliance of Southco products with RoHS is affected through:
  - Strictly controlling the materials and finishes that are used in our products
  - Periodic audits of our suppliers to insure compliance
  - Periodic analysis, on an as-needed basis, of our products.

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## RoHS - RECAST

- Directive 2011/65/EU of the European Parliament and of the Council of June 8, 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE) became effective on January 3, 2013. As a result, some of the provisions of Directive 2002/95/EC will be phased out and new provisions of the Directive 2011/65/EU will be phased in over time. Southco has an aggressive plan to meet all the requirements of RoHS – Recast on the mandated time frame.
- Before Directive 2011/65/EU is full force, Southco will continue to mark our parts as “RoHS Compliant”, implying that the parts meet requirements of Directive 2002/95/EC .
- Once Directive 2011/65/EU (RoHS - Recast) is fully implemented, certain products may have “CE” marking in an effort to consolidate marking requirements as mandated by the European Parliament.

## REACH Compliance

In June 2007, the European Union Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) was first released. This Regulation establishes specific duties and obligations for companies in the European Union (EU) that manufacture or import substances on their own, in preparations, or in articles.

- Under the structure of the REACH Regulation, Southco is a manufacturer and supplier of “**articles**” to our EU customers through several Southco entities located within the EU. We do not manufacture or supply “substances” or “preparations” and our articles do not involve the “intentional release of substances”. Accordingly, we foresee no registration or pre-registration requirement for the products we supply to you.
- Southco believes that even though REACH is an EU regulation, the Southco products are affected in all geographical regions. Therefore, Southco has put together a global team to implement REACH on a worldwide basis.
- Southco is constantly monitoring the substances of very high concern (SVHCs), as defined by REACH, in our products. This will be an on-going process since the complete list of SVHCs will be released in stages.
- The customers are encouraged to visit the following site to get the most up to date information on current list of SVHCs under REACH: <https://echa.europa.eu/candidate-list-table>
- Southco has decided to use International Material Data System (IMDS) to report compositional information, including presence and concentration of SVHCs, in our products. Since this is a constantly evolving process, we will be regularly updating the IMDS information on Southco products as the European Chemical Agency publishes the list of additional SVHCs periodically. The information in IMDS is provided by Southco on a “best effort” basis using the information provided by our suppliers, published data and the documentation from the European Chemical Agency (ECHA). No attempt has been made to verify this information by third party analysis. Visit [www.mdssystem.com](http://www.mdssystem.com) to access IMDS data.
- Southco products (articles) do not contain Substances of Very High Concern (SVHC) above the threshold value declared as per ECHA till January 12, 2017 with 173 SVHC.

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## Compliance Information on Southco Products

The compositional information of our products is posted on the International Material Data System (IMDS) and customers are encouraged to utilize this resource to get more information on Southco products. The IMDS data can be accessed through [www.mdssystem.com](http://www.mdssystem.com). Southco Organization Code is: **9093** in International Material Data System.

- Statements of compliance with various regulations and directives are posted on [www.southco.com](http://www.southco.com)
- Customers requiring RoHS compliance status are advised to use the RoHS Compliance Search on [www.southco.com](http://www.southco.com) at URL: <http://www.southco.com/en-us/product/rohs.html?pn=>
- For additional information, please contact Sharad Raut, Global Environmental Compliance Engineer at [Techsupport@southco.com](mailto:Techsupport@southco.com)
- The environmental regulations change constantly. We will try our best to keep you abreast of changes that affect Southco products by periodically updating this letter. Please refer to the current version of this letter on [www.southco.com](http://www.southco.com)

We thank you for your continued support and understanding.



Al Frattarola  
Director of Global Technology  
Southco Global Engineering Services

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| REV | REV DATE          | DESCRIPTION OF CHANGE   |
|-----|-------------------|---|
| A   | April 26, 2013    | Reviewed, included RoHS-Recast and CE markings and assigned a Form number   |
| B   | April 24, 2014    | Revised Candidate SVHC 151-list addition date under REACH statement.  |
| C   | June 17, 2014     | Revised Candidate SVHC 155-list addition date under REACH statement.  |
| D   | January 15, 2015  | Revised Candidate SVHC 161-list addition date under REACH statement.  |
| E   | June 26, 2015     | Revised Candidate SVHC 163-list addition date under REACH statement.  |
| F   | December 21, 2015 | Revised Candidate SVHC 168-list addition date under REACH statement.  |
| G   | June 21, 2016     | Revised Candidate SVHC 169-list addition date under REACH statement.  |
| H   | September 16,2016 | Revised RoHS restricted substances with addition of four phthalates as per the amendment to Annex II, dated March 31, 2015. |
| I   | January 14, 2017  | Revised Candidate SVHC 173-list addition date under REACH statement.  |