

ROHS, REACH and Conflict Mineral Policy of S.C. SYSTRONICS S.R.L. ("SYSTRONICS")

As a contract manufacturing company with the majority of its customers in the European Union SYSTRONICS 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)**

SYSTRONICS 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, SYSTRONICS 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 SYSTRONICS 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 SYSTRONICS do therefore fully comply with the ROHS directive and do not contain any of the substances listed below by more than 0.1W% (Cadmium 0.01W%)

- **Cadmium (Cd)**
- **Lead (Pb)**
- **Mercury (Hg)**
- **Hexavalent Chromium: (Cr VI)**
- **Polybrominated Biphenyls (PBB)**
- **Polybrominated Diphenyl Ethers (PBDE)**
- **Bis(2-Ethylhexyl) phthalate (DEHP)**
- **Benzyl butyl phthalate (BBP)**
- **Dibutyl phthalate (DBP)**
- **Diisobutyl phthalate (DIBP)**

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

2 REACH Regulation (EU) 1907/2006

SYSTRONICS 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.

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

Therefore SYSTRONICS 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 SYSTRONICS 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.

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

SYSTRONICS 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, SYSTRONICS will support our customers in finding possible alternatives for the affected parts or processes.

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

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

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

Therefore SYSTRONICS 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, SYSTRONICS nonetheless supports the rules outlined in the Section 1502.

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

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

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