

## 1. Policy statement

Infotec Limited is committed to providing products that are safe for human health and the environment and that comply with all applicable laws and regulations concerning chemical substances. This includes full adherence to the EU Restriction of Hazardous Substances (RoHS) Directive and the EU Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation. We will work diligently with our suppliers to ensure the materials, components, and substances used in our products meet all current and future requirements.

## 2. Scope

This policy applies to all products manufactured, imported, distributed, and placed on the market by Infotec Limited. It covers all materials, components, and manufacturing processes, including those procured from external suppliers.

## 3. Policy administration and responsibilities

- **Management:** The management team headed by the **Managing Director**, is responsible for implementing this policy, allocating necessary resources, and reviewing performance to ensure continuous improvement.
- **Compliance officer:** The **Quality Assurance Manager**, will oversee the technical aspects of REACH and RoHS compliance. Their duties will include monitoring regulatory changes, coordinating with suppliers, and maintaining technical documentation.
- **Procurement and supply chain:** The procurement team, led by the **Group Head of Purchasing**, will be responsible for obtaining compliance declarations and other necessary documentation from all suppliers. They will ensure that suppliers are aware of and adhere to Infotec Limited's compliance requirements.
- **Manufacturing and quality control:** These teams will ensure that production processes and equipment do not introduce restricted substances or contaminate compliant materials. They will also oversee internal testing and auditing.
- **Employees:** All employees are responsible for following the procedures outlined in this policy and reporting any concerns related to restricted substances.

## 4. REACH policy details

As a downstream user of chemicals and a manufacturer of articles (products with a specific shape, design, or surface), Infotec Limited is committed to the following:

- **Substances of very high concern (SVHCs):** Infotec Limited will continuously monitor the European Chemicals Agency (ECHA) Candidate List of SVHCs.
  - For any SVHC present in a concentration above 0.1% by weight in any of our articles, we will promptly inform our customers to ensure safe use and disposal.
  - If an SVHC is added to the Candidate List, we will immediately communicate with our suppliers to confirm the substance's presence and seek compliant alternatives if necessary.
- **Restricted substances:** We will ensure that our products do not contain any substances listed in Annex XVII of the REACH regulation above the maximum allowed limits.
- **Supplier collaboration:** We will engage in continuous dialogue with our supply chain to collect the necessary data and maintain up-to-date compliance records.
- **Registration and authorisation:** Where required, Infotec Limited will support the registration of substances or the application for authorisation of SVHCs in cooperation with our suppliers or regulatory bodies.

## 5. RoHS policy details

Infotec Limited's policy is to ensure that its electrical and electronic equipment (EEE) and components do not contain the restricted substances above the permissible maximum concentration values.

- **Current restricted substances:** Our products will not exceed the limits for the following substances, as defined by EU RoHS Directive 2011/65/EU and its amendment (EU) 2015/863:
  - Lead (Pb)
  - Mercury (Hg)
  - Cadmium (Cd)
  - 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)
- **Documentation:** We will maintain the required technical documentation as required, to demonstrate conformity, which includes supplier declarations, test reports, and our internal assessment procedures.
- **Declaration of conformity:** For all finished products within the scope of the RoHS Directive, Infotec Limited issues and retains Declarations of Conformity.
- **Due diligence:** We will perform due diligence on our supply chain to verify the compliance status of materials and components.

## 6. Implementation and review

To ensure effective compliance, Infotec Limited will:

- **Supplier audit and selection:** We will vet all suppliers to ensure their commitment to REACH and RoHS compliance. This includes requesting Full Material Declarations (FMDs), Certificates of Compliance (CoCs), and Material Safety Data Sheets (MSDSs).
- **Risk assessment:** We will regularly assess our products and supply chain for potential risks related to restricted substances and develop mitigation plans.
- **Internal training:** We will provide training to relevant staff members to ensure they understand the requirements of this policy and their roles in maintaining compliance.
- **Continuous monitoring:** We will stay informed of evolving REACH and RoHS regulations and update this policy and our procedures as new requirements, substances, or restrictions are added.

## 7. Non-compliance

Any failure to comply with this policy will be taken seriously. Consequences of non-compliance, such as product recalls, or loss of market access, will be addressed promptly and effectively. In the event of an identified non-conformance, Infotec Limited will take immediate action to investigate, inform customers, and implement corrective measures.

A handwritten signature in black ink, appearing to read "Neil Scott", enclosed within a large, loopy oval shape.

Neil Scott – Managing Director

07/10/2025

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