



**Regulatory Compliance and Externally Interested Parties**  
**SCIP ECHA Reach /RoHS/CMRT Compliance Advisory**  
**Effective June 22<sup>nd</sup> 2022**

**Environmental Sustainability and Social Responsibility Policies:**

Dear Pleora client,

Pleora conducts business responsibly and in a manner designed to protect the health and safety of our employees, customers, the public and the environment. Pleora demonstrates this responsibility through our actions and commitment to environmental & social legislation. This includes ensuring Pleora and our supply chain supports the following regulatory elements.

We occasionally distribute information bulletins with important environmental regulatory or standards compliance related information. We also provide generic an all product environmental compliance statements as follows:

**REACH:**

The following information has just become available:

**The EU Regulation 1907/2006 on Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH), entered into force in June 2007, affects all companies producing, importing, using, or placing products on the European market. The aim of the REACH regulation is to ensure a high level of protection of human health and the environment from chemical substances.**

**Pleora products are “articles” as defined in Article 33 of the REACH Regulation, it requires companies who supply products which include any article which contains more than 0.1% by weight of any REACH Candidate List Substance to provide their customers with “sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.”**

**Pleora is committed to and provides REACH compliant products that meet the regulatory expectations of EU reach directives and requests by our customers. Pleora is compliant with REACH SVHC Annex XIV authorization list dated June 10<sup>th</sup> 2022. The SVHC list now has 224 candidate entries. Any exemptions on parts noted will be documented on the SCIP ECHA dossier portal. Any SCIP ECHA non listed products will be fully compliant and we will not provide FMD disclosures.**



**Pleora Definition of Fully Compliant:**

**No substances exceed the limits place by REACH or ROHS and no exemptions are present. Fully compliant products will not be posted in SCIP ECHA and only products with allowable exemptions will be posted in SCIP ECHA.**

**Provision Vehicles /SCIP ECHA:**

As per European Union entity ECHA enabled the SCIP dissemination platform on September 14, 2021. The platform provides users, including consumers, recyclers, and other manufacturers, with information about Pleora products containing SVHCs that were submitted into the SCIP ECHA database.

SCIP ECHA has provided a post announcing the dissemination portal and with information about SCIP data that has been published: <https://echa.europa.eu/-/know-more-about-hazardous-chemicals-in-products-scip-data-published>

The platform is accessible at: <https://echa.europa.eu/scip-database>

Note: The Pleora products are listed under the product type, "VIDEO INTERFACE." and all Pleora part numbers sold will be posted. Search for the purchased Pleora part number and its SCIP ECHA dossier will appear.

See example: Factsheet for the iPORT NTX-NBT: <https://echa.europa.eu/factsheet/-/factsheet/86472866>

## VIDEO INTERFACE IPORT NTX-NBT

Part Number: 900-8003  
 Model: IPORT NTX-NBT  
 Part Number: 900-8011  
 Part Number: 900-8010  
 Part Number: 900-8020  
 Part Number: 900-8006  
 Part Number: 900-8013  
 Part Number: 900-8017  
 Part Number: 900-8007

### OVERVIEW

For the safe use instruction of the article go to: [Safe use instruction](#)

### CANDIDATE LIST SUBSTANCES

Substance name(s)	Reason for inclusion
Lead	Toxic for reproduction (Article 57c)



**Identifiers** ▼

**Article name**  
pDiode1-3

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**Categorisation** ▼

**Article category**  
8541100000 - SECTION XVI (84 - 85) Machinery and mechanical appliances; electrical equipment; parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > Diodes, transistors and similar semiconductor devices; photosensitive semiconductor devices, including photovoltaic cells whether or not assembled in modules or made up into panels; light-emitting diodes (LED); mounted piezoelectric crystals > Diodes, other than photosensitive or light-emitting diodes (LED)

For Example NTX-MINI Dossier: <https://echa.europa.eu/factsheet/-/factsheet/79313032>

For Pleora clients please feel free to access the product family SVHC data from our product dossier's in ECHA/SCIP. This data format is not under our control and is updated if required as BOM (Bill of materials) modifications or PCN's are approved and with new product release.



**RoHS:** Pleora provides RoHS (Restriction of Hazardous Substances) compliant and approved exempt products that meet or exceed the expectations of our customers by adhering to environmental regulations established by European Union (EU) RoHS directives.

**RoHS 1:** Directive 2002/95/EC (RoHS 1) banned the use of six hazardous substances (below) in Electrical and Electronic Equipment (EEE) except where exempted.

- Cadmium(Cd):< 0.01% (100ppm)
- Mercury (Hg):< 0.1% (1000ppm)
- Lead (Pb) :< 0.1% (1000ppm)
- Hexavalent chromium (Cr6+) : <0.1%(1000ppm)
- Polybrominated biphenyls (PBB): <0.1 %;(1000ppm)
- Polybrominated diphenyl ethers (PBDE): <0.1 %(1000ppm)

**RoHS 2:** Directive 2011/65/EU, known as RoHS-Recast or RoHS 2, was published in 2011 by the EU.

It introduced additional requirements for Declarations of Conformity and associated CE Markings of products. The directive also added category 8 (medical devices) and category 9 (monitoring and control instruments), and has additional compliance recordkeeping requirements.

**RoHS 3:** Directive 2015/863/EU, colloquially known as RoHS 3, was published in 2015 by the EU. This directive added four additional restricted substances (Phthalates) to the Annex II of RoHS 2. The restriction of four Phthalates below will become effective July 2019.

- Bis(2-Ethylhexyl) phthalate (DEHP): < 0.1% (1000ppm)
- Benzyl butyl phthalate (BBP):< 0.1% (1000ppm)
- Dibutyl phthalate (DBP): <0.1% (1000ppm)
- Diisobutyl phthalate (DIBP): <0.1%(1000ppm)

The products include application of exemptions 6(a) [0], 6(c) [1], 7(a) [2] and 7(c)-I [3].

[0]; 6 (a). Lead as an alloying element in steel for machining purposes and in galvanized steel containing up to 0.35 % lead by weight.

[1]; 6 (C). Copper alloy containing up to 4% lead by weight

[2]; 7(a). Lead in high melting temperature type solders (i.e., lead-based alloys containing more than 85% by weight or more lead).

[3]; 7(c)-I. Electrical & electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors.

Pleora continues to monitor the exemptions listings as they evolve and or are proposed to be split or eliminated.

### **Conflict Minerals:**

Pleora has a responsible minerals sourcing policy compliant with IPC1755. Pleora is committed to sourcing components and materials from companies that share our values regarding respect for human rights, integrity, and environmental responsibility. This includes supporting the Dodd-Frank Wall Street Reform and Consumer Protection Act as it relates to Conflict Minerals (Section 1502),



designed to eliminate support of illegal and unethical actions in the Democratic Republic of Congo, and the adjoining countries (i.e. Covered Countries) associated with the mining of 3TG.

Conflict Minerals refers specifically to 3TG minerals and their derivatives:

- Cassiterite : Ore from which Tin (Sn) is extracted;
- Columbine-Tantalite : Ore from which Tantalum (Ta) is extracted;
- Wolframite : Ore from which Tungsten (W) is extracted;
- Gold (Au) : Rare metal found in a native (pure) form and obtained as a byproduct of other mining operations.

Although Pleora is not listed on the US Securities and Exchange Commission, we are diligently working with our suppliers to ensure our products are manufactured within a socially responsible supply chain and supporting the conflict minerals objective.

#### **US EPA Toxic Substances Control Act: TSCA**

Pleora products are free from these substances so listed in the TSCA.

DecaBDE (CASNo: 1163-19-5)

PIP (3:1) (CASNo: 68937-41-7)

2,4,6-TTBP (CASNo: 732-26-3)

PCTP (CASNo: 133-49-3)

HCBD (CASNo: 87-68-3)

#### **Pleora continues to monitor these evolving legislations for impact:**

##### **Canada Proposed Prohibition of Toxic Substances**

<https://gazette.gc.ca/rp-pr/p1/2022/2022-05-14/html/reg2-eng.html>

##### **EU Adding Formaldehyde to REACH Annex XVII**

Not applicable to articles for outdoor, industrial or professional use.\*\*\*\*

##### **EU Proposed Amendment to Perfluoranoic Acid (PFOA) in POPS –Under review**

##### **EU Opinion Publised May 18<sup>th</sup> 2022 restriction of PFHxA**

Known application in EEE industry are exempt for many years. No impact.

#### **Disclaimer ROHS, Reach, Conflict Minerals, TSCA and Canada Toxic Substances:**

All product information relating to environmental compliance, including, but not limited to REACH and RoHS, and conflict minerals and TSCA listed above is provided to Pleora by the product OEM component manufacturers and our raw material suppliers and is provided by Pleora via compliance certifications at the product level on an "AS IS" basis. Pleora makes no



representation as to the accuracy or completeness of the information. Pleora DISCLAIMS ALL REPRESENTATIONS, WARRANTIES AND LIABILITIES UNDER ANY THEORY WITH RESPECT TO THE PRODUCT INFORMATION PROVIDED.

All product compliance statement information is subject to change without notice. Pleora is not responsible for typographical or other errors or omissions in component/product information.

Pleora has assessed compliance to REACH, ROHS, Conflict Minerals, Candad Toxic Substances and TSCA listed above and to the best of our knowledge indicate compliance/or exemptions (SEE SCIP ECHA Dossiers) based on available data provided by our OEM suppliers or industry consortia reporting data bases.

The release of the supporting assessment component detail beyond our statement of conformity at the product level to the above noted standards shall not be provided. Pleora does utilize the ECHA SCIP data base to declare products that contain an SVHC with an available exemption. Please feel free to inquire through SCIP ECHA access.

Pleora products do not contain the Substances of Very High Concern as published by REACH SCIP/ECHA with exemption of lead. \*\* Lead which was added to the SVHC list may be contained in some products where the RoHS exemption 7a (lead in high melting temperature type die attach solder) or 7c lead Oxide in ceramic. Maximum limits for exempted ROHS directive recast does not apply.

Unique ROHS compliance to Saudi Arabia:

Pleora will not conduct independent lab testing for ROHS compliance as directed from this country standard. We state self-declared or vendor declared ROHS and other compliance only.

Attested to by: Date June 22, 2022.

Larry McHenry CET  
Quality Manager Pleora  
Ottawa Canada 613-857-4849

A handwritten signature in black ink that reads "larry mchenry". The signature is written in a cursive, lowercase style.