

Regulatory Compliance and Externally Interested Parties
SCIP ECHA Reach /EU-RoHS/China RoHS/TSCA/CMRT
USA UFLPA Forced Labor entity act
Compliance Advisory
Effective Dec 11th 2023 REV 15

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 14th 2023. The SVHC list now has 235 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 Pleora **will not provide FMD disclosures and we will not provide individual product specific disclosures or certs. Pleora provides product details only through this policy/SCIP ECHA dossiers and customers are encouraged to create a SCIP ECHA access license, search for Pleora products and pull the dossiers themselves.**

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.

Full Material Declarations of Pleora Assemblies Unavailable:

Pleora reviews compliance by sub assembly BOM item and usually procured parts come from OEM suppliers and or franchised distribution. Pleora assesses yes/no compliance to all required declarable environmental regulations and the majority of OEM suppliers do not provide (FMD-full material declarations all chemistry) rather they can provide designated substance declarations. It is impossible for Pleora therefore to derive and collate (FMD) at the assembly level:

Additional information (FMD)

There are a few disadvantages to Full Material Disclosure (FMD) reports outlined below:

1. Due to the need to protect supplier IP many substances remain undisclosed in a full material declaration. Many OEM mandate an NDA between all parties sharing information in FMD format that is costly and prohibitive as well. In the event a previously undisclosed substance becomes restricted or reportable, the supply chain will have to follow the process for updating existing documentation to report the newly reportable substance.
2. Due to supplier limited knowledge, FMD reports often include process chemicals which do not remain in the product. These process materials, if declared, would mislead the downstream suppliers and eventually the customer regarding the correct material composition of the products.
3. Most product bills of materials (BOM) are multisource, which means that any given component will have more than one supplier. Both the negative declaration used by Pleora, as well as any possible FMD would include the worst-case data (i.e., any reportable or restricted substances would show up in the report). However, the FMD does not give an accurate depiction of all possible declarable substances in the product.

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:

Here's the factsheet for the iPORT NTX-NBT: <https://echa.europa.eu/factsheet/-/factsheet/86472866>

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VIDEO INTERFACE IPORT NTX-NBT

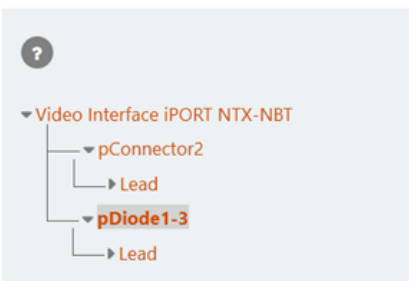
Part Number: 900-8003
 Model: IPORT NTX-NBT
 Part Number: 900-8011
 Part Number: 900-8010
 Part Number: 900-8020
 Part Number: 900-8006
 Part Number: 900-8013
 Part Number: 900-8017
 Part Number: 900-8007

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

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 direct 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. **Pleora will not provide links as this portal access requires clients to create their own access.**

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.

China RoHS:

Pleora products are self declared as China RoHS compliant and a compliance table is provided below: Se applicable reference standards and the expected life cycle table is also listed. All Pleora products cannot be individually labeled due to functional restrictions and lack of space. For specific details on exempted materials see RoHS here above.

		China ROHS Compliance				
		有害物质				
组件名称	Hazardous Substances					
Component Name	铅	汞	镉	六价铬	多溴联苯	多溴二苯醚
All Pleora Hardware Products	Pb	Hg	Cd	Cr6+	PBB	PBDE
印刷电路板组装						
Printed Circuit Board Assemblies	X	0	0	0	0	0
电缆及电缆组件						
Cables and Cable Assemblies	0	0	0	0	0	0
金属						
Metal Work	0	0	0	0	0	0
本表格是按照 SJ/T 11364 的规定编制。						
This table is prepared in accordance with the provisions of SJ/T 11364.						
O: 表示该有害物质在该部件所有均质材料中的含量均在 GB / T 26572标准规定的限量要求以下						
O: Indicates that said hazardous substance contained in all of the homogeneous materials for this part is below the limit requirement of GB/T 26572.						
X: 表示该有害物质至少在该部件的某一均质材料中的含量超出 GB / T 26572标准规定的限量要求						
X: Indicates that said hazardous substance contained in at least one of the homogeneous materials used for this part is above the limit requirement of GB/T 26572.						
The product contains one hazardous substance (Pb) but is safe to use during the Environmental Protection Use Period (EPUP). This period is indicated by the number of years shown on the logo. When the period expires, the product should be properly disposed of or recycled. The substance is EU ROHS compliant via exemption 6c 7A 7C						
						



Halogen Free: Low Halogen per JS709C: Pleora compliant.

POP: EU commission Reg 2019/1021 Persistent Organic Pollutants: Pleora compliant.

RISP: Restriction of Substances Packaging (94/62/EC): Pleora compliant.

Conflict Minerals:

Pleora has a responsible minerals due diligence sourcing policy compliant with IPC1755 and the OECD due diligence guidance. We are not a member of RMI but work to utilize RMI CMRT report formats and SOR (suppliers or refiners listings) from a third party. 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), and EU 2017/821 designed to eliminate support of illegal and unethical actions in the Democratic Republic of Congo, and the adjoining

countries and other regions other than the DRC great lakes region (i.e. Covered Countries) associated with the mining of 3TG.

Pleora is considered a downstream party in reference to the aforementioned legislation and simply conducts due diligence compliance. Pleora is considered to be operating beyond the metal stage and Pleora does not have reporting obligations under the EU and Dodd Frank regulation, but use reporting and other tools to make Pleora due diligence more transparent. As such Pleora cannot conduct audits of metal smelters/miners and rely on the RMI NGO and our OEM suppliers to do so.

We believe it is essential to establish validated conflict-free sources of 3TG within the Democratic Republic of the Congo (the "DRC") and adjoining countries and other affected regions globally (together, with the DRC, the "Covered Countries"), so that these minerals can be procured in a way that contributes to economic growth and development in the region. To aid in this effort, we have established a conflict minerals policy and an internal team to implement the policy.

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.
- Working 2024 effort to include Cobalt. TBD.

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.

We expect our suppliers to assure the 3TG/cobalt in our products are sourced from conformant conflict-free smelters, (SOR) such as those audited through the RMI's RMAP.

<http://www.responsiblemineralsinitiative.org>,² the London Bullion Market Association (LBMA) or the Responsible Jewellery Council, each of whom perform due diligence on the source and chain of custody of the 3TG used in our products and provide their due diligence measures to us upon request.

However, Pleora sells products that contain COTS OEM components manufactured for us by other companies and products that include ready-made component parts that we purchase from third parties. Although, many of our hardware products contain conflict minerals, we do not purchase ore or of minerals and are therefore unrefined conflict minerals from mines. We are many steps removed in the supply chain from the mining considered a "downstream" purchaser. We purchase materials used in our products from a large network of suppliers: some of those materials contribute necessary conflict minerals to our products.

The origin of minerals cannot be determined with any certainty once the ores are smelted, refined, and converted to ingots, bullion, or other derivatives. The smelters and refiners (referred to as "facilities") are consolidating points for ore and are in the best position in the total supply chain to know the origin of the ores. We rely on our suppliers to assist with our reasonable country of origin inquiry and due diligence efforts, including the identification of smelters and refiners, for the minerals contained in the materials which they supply to us.

If required, we may execute the termination and supplier blacklisting processes that disqualify certain suppliers from doing business with Pleora who refuse or are unable to provide additional conflict minerals data or move away from certain smelters.

US Treasury Sanctions/Expansion of CMRT efforts using 3rd party expert: "Source Intelligence:"

In 2023 our CMRT campaign was expanded to use the services of , "Source Intelligence." to issue and collect CMRT due diligence reports from our supply chain. This effort will continue annually as we improve our CMRT reporting and due diligence.

Pleora has been advised of US SEC 2022 sanctions and is hereby communicating to our OEM suppliers in our 2024 CMRT campaign to review and ensure compliance to US treasury/EU sanctions against African Gold Refiners and Goetz companies. (and several others). We encourage OEM suppliers and their sub tiers to assess their CMRT compliance and remove these implicated suppliers per the Treasury and other global sanctions. Pleora has no control over OEM compliance with these sanctions rather we are informing and encouraging compliance annually thus conducting due diligence.

<https://home.treasury.gov/news/press-releases/jy0664>

Pleora CMRT reports are available under our website ENV policies section. Version 6.31 May 2023 is not yet available. We are conducting surveys and these will be completed June 2024.

Lastly, we have seen an increase in high-risk smelters: 2023 Campaign Awareness:

Compared to prior years due to government sanction-related activity or other criteria, which has resulted in more smelters being deemed nonconformant. We continue to be guided by inputs and guidance from industry leading sources and we continue to develop our response and remediation measures to remediate the high-risk smelters in our supply chain over time. Since the smelter data in our CMRT and this Report reflect data collected from our suppliers in the past year, we expect that our Company Level CMRTs may continue to include high-risk smelters relating to sanction-related activity until we can successfully work with our supply base to either remediate or remove sanctioned smelters from their supply chain.

We have contracted and are communicating through a third party provider to all OEM suppliers the observed presence of these RMI and US Treasury implicated smelters/refiners of concern and requesting updates with 6.3.1 RMI CMRT report/ refresh expected summer 2024.

Suspected SOR and declared in our CMRT Reports:

African Gold Refinery, Fidelity Printers and Refiners Ltd., Industrial Refining Company, Kaloti Precious Metals, and Sudan Gold Refinery.

US EPA Toxic Substances Control Act:TSCA

To the best of our knowledge Pleora products are complaint /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 Perfluorooctanoic Acid (PFOA) in POPS:

EU regulation 2019/1021 and amendment 2020/784 on persistent organic pollutants POPS to the best of our knowledge Pleora products are free from POPS.

EU Opinion Published May 18th 2022 restriction of PFHxA:

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

Basel /Rotterdam Stockholm Conventions:

<http://www.brsmeas.org/MediaHub/News/PressReleases/COPs2022closurepressrelease/tabid/9214/language/en-US/Default.aspx>

USA Uflpa entity List Compliance:

This list is monitored by Pleora through access to the <https://www.dhs.gov/uflpa-entity-list>. We do not use any entity listed here in our production, supplier base or services.

Disclaimer ROHS , Reach, Conflict Minerals, PFAS, 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, Canada 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.

Recent PFAS Declarations for state of Maine/Others:

Pleora has engaged with a third party, “**Source Intelligence,**” to begin a 2024 campaign to assess PFAS risks and create a mitigation plan through the end of 2024. Pleora is committed to sustainability and Environmental stewardship. We are presently assessing through 2024 campaigns on PFAS if our raw materials and component OEM have the reporting in place as mandated by the US State of Maine/(Others) and we will be unable to declare reporting into the Maine system as most commercial OEM component suppliers we use have not yet assessed PFAS content. This legislation is rapidly evolving and many regions simply cannot report as yet. Pleora has a policy to address, identify PFAS content and will formulate a plan as our lower tier supply chain is impacted.

What Are PFAS:

Referred to as, “Forever Chemicals.” that have persistent Bioaccumulations

California Proposition 65:

Pleora products are sub assemblies that are not commercially or retail sold and are not accessible to consumers as all parts are self contained inside a customer system upon installation.

Pleora Technologies conducts its worldwide operations in a socially responsible, ethical and sustainable manner to protect the environment, and ensure the safety and health of our employees, customers, visitors and surrounding communities. To accomplish this policy, we hereby establishes the following objectives to be adopted as standard policies by all our worldwide operations.

Safety and Health of our Employees:

Provide a safe and healthy working environment for our employees and contractors working at our sites both in Canada and abroad following applicable state and local laws. Integrate safety, health, and environmental protection into our business activities. Reduce risk in workplace to a level defined as acceptable, considering the legal requirements and Pleora policy.

Plan, implement and control effectively the processes necessary to meet the health and safety requirements and eliminate health hazards by using acceptable hierarchy of risk controls. Educate and train employees and contractors to conduct their daily activities in an environmentally responsible and safe manner. Pleora is committed to the prevention of injury and ill health and continual improvement in safety and health management performance. Fix and achieve targets regularly by implementing programs to improve health and safety of the employees and optimize the environmental performance.

Protection of the Environment:

Conduct our business operations in a manner that protects the environmental quality of the communities in which our facilities are located. Reduce risks involved with storage and use of hazardous materials. Pleora establishes and maintains management systems by a PFMEA systematic verification process to ensure continuous improvement of the environmental performance. Identify and mitigate all risks to environment, people and property. Maintain emergency Disaster Recovery and preparedness plans at all manufacturing facilities.

Compliance with Environmental Health and Safety (EHS) Laws and Regulations:

Meet or exceed the requirements of all relevant environmental, health and safety laws and regulations in every location. Maintain a system that provides timely updates of regulatory change. Develop a product stewardship program that ensures that changes in EHS requirements are reflected in our products and processes. Cooperate fully with government agencies in meeting applicable requirements.

Energy, Resource Conservation and Pollution Control:

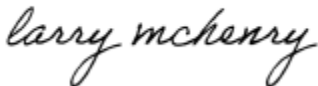
Strive to minimize consumption of energy and materials, and the emissions of greenhouse gases and carbon for sustainable use in the design of products and processes. Promote the recycling of materials, including hazardous wastes, whenever possible. Minimize the generation of hazardous and non-hazardous wastes at our facilities to prevent or eliminate pollution. Manage and dispose of waste safely and responsibly. Comply with Ontario OSHA, WHIMIS and Environmental legislation. As required complete facility provincial MOE (Ministry of Environment) C of A applications and regulatory approval when required. All packaging materials are recycled at Pleora, all scrap electronics are safely destructed, ground up and meals xtracted by a third party destructor facility with certificates of destruction on file.

Communications:

Promote sound environmental, health and safety principles and practices by encouraging open communication with employees, governmental agencies, suppliers, contractors, customers and industry groups. Obligate to involve and consult employees or their representatives in decision making within the scope of management systems, in the evaluation of health and safety risks and determination of protective actions by regularly consultations.

Attested to by: Dec 11th 2023.

Larry McHenry CET
Quality /Environmental Manager Pleora
Ottawa Canada 613-5621-0533

A handwritten signature in black ink that reads "larry mchenry".