

# Materials Compliance Policy

This Policy outlines NOTE Windsor's principles regarding Materials Compliance, including:

- Conflict Minerals
- RoHS and Reach
- Counterfeit
- Date Code

## 1. Conflict Minerals Statement

Although we are not required to report to the Securities and Exchange Commission (SEC), we are assisting our customers to the best of our ability such that they can report to their customers or the SEC as appropriate for their products.

As a contract manufacturer it is not possible for us to control, via distribution, all the individual component manufacturers specified in our customers' bills of material's. Therefore, we are not able to confirm, sign or complete forms or declarations that we may receive from our customers. This can only be done by the manufacturers themselves.

However, as your manufacturing partner, we are responsible for the soldering process and what solders we use. Please see the links below for the latest declaration issued by Element Solutions Inc (ALPHA) for all solders we use within our factory.

[CMRT Alpha](#)

[Element Solutions Inc Sustainability, Governance and Compliance](#)

## 2. RoHS / REACH

EC Directive 2015 / 863 / EU (the RoHS3 Directive) restricts the use of the hazardous substances listed below in electrical and electronic equipment.

RoHS3 compliance at NOTE Windsor means that: -

- Our suppliers are required to comply with RoHS Regulations for materials purchased by us unless specifically noted as being non-RoHS. i.e., the default position is for all parts to be RoHS compliant.
- Customers have adequately specified their assembly / product as being RoHS compliant and have correctly specified all parts within their Bill of Materials as RoHS Compliant.
- Our Manufacturing process for specified assemblies uses Lead free solder.

Compliance is either because the products do not contain any of the restricted substances referred to in the Article 4(1) of the RoHS directive at the concentrations in excess of those permitted under the RoHS directive or removal of the restricted substances is not technically possible and their existence in the products at levels in excess of these concentrations is allowed as one of the particular applications listed in the Annex to the RoHS Directive.

For these purposes, the maximum concentration values of the restricted substances by weight in the homogenous materials are: -

|                                     |       |
|-------------------------------------|-------|
| Lead                                | 0.1%  |
| Mercury                             | 0.1%  |
| Hexavalent Chromium                 | 0.1%  |
| Polybrominated Biphenyls            | 0.1%  |
| Polybrominated Diphenyl Ethers      | 0.1%  |
| Cadmium                             | 0.01% |
| Bis (2-ethylhexyl) Phthalate (DEHP) | 0.1%  |
| Butyl benzyl phthalate (BBP)        | 0.1%  |
| Dibutyl Phthalate (DBP)             | 0.1%  |
| Dilsobutyl Phthalate (DIBP)         | 0.1%  |

Under the European Union (Withdrawal) Act 2018, the EU REACH Regulation was brought into UK law on 1 January 2021 and is known as UK REACH.

REACH Compliance at NOTE Windsor means that: -

- Our suppliers are required to comply with REACH Regulations for materials purchased by us.
- We do not intend to register any substances or mixtures as we do not supply such items; however, our suppliers are required to register any substances or mixtures if the article supplied to us meets the conditions in article 7.1 and 7.5 of the REACH Regulation.
- Our suppliers are required to ensure that all articles supplied that contain substances or mixtures held within the candidate list of Substances of Very High Concern (SVHC) are communicated to us as per Article 7.2 of the Reach Regulation.
- Our Manufacturing processes do not contain substances of very high concern (SVHV) above the threshold value declared in Article 57 of UK REACH.

To the best of our knowledge and based on the information given by our suppliers, NOTE Windsor do not intentionally supply articles with substances or mixtures above the threshold value listed in the REACH Regulation titled "Candidate List of Substances of Very High Concern"

### **3. Counterfeit Component Policy**

Counterfeiting is a serious global problem. To protect our customers, we have implemented a proactive counterfeit prevention policy for all our component purchases.

Where possible, NOTE Windsor will procure all goods from known and reputable sources. These sources are preferably manufacturers or their authorised franchised distributors.

Where products are obsolete or hard to find, NOTE Windsor will only procure through our approved independent distributors. We have built up a close working relationship with experienced non franchised distributors. These suppliers may provide certificates of conformance and/or compliance where applicable. We expect all of our suppliers to work with us to ensure that counterfeit product/components do not reach our premises.

Our approved suppliers must either have: -

- In-house capability to test components
- Secured an accredited external third-party source that has the capability to test the components
- Have the ability to provide evidence of material compliance and offer a 60-day warranty of these components.

The performance of these suppliers is monitored regularly by NOTE AB.

We inform suppliers of this policy and hold suppliers accountable for compliance.

The Component Obsolescence Group (COG) will be notified of any counterfeit components identified by NOTE Windsor to enable them to update the COG database.

#### **4. Date Code**

Receiving and using electronic components that are very old may cause solderability issues in production, leading to extended manufacturing times due to rework and / or replacements. To protect NOTE Windsor and our customers from the effects of tarnished or unsolderable components due to their age, we implement a policy limiting the age of a supplied component to a maximum of 5 years from date of manufacture or sealing (in the case of higher MSL parts).

Having investigated the industry date code acceptance policies across a number of manufacturers and industries, it appears that some manufacturers (i.e., Maxim) are advising that date code restrictions can be lifted completely, however some (i.e., Freescale & TI) are advising that a 5-year limit is prudent, but not essential (particularly TI).

The most important element in maintaining the integrity of a component, is the storage conditions (Bag, environmental relative humidity) of the parts and in some papers, the suggestion is to use the Dry Bag Seal date instead of the manufacturing date code.

There are a few of exception to the above: -

- Batteries — These start to degrade immediately after manufacture and therefore have a limited shelf life.
- Components that have sulphur resistant coatings (PdAg) and parts that are Electroless Nickel Immersion Gold (ENIG) plated also degrade quickly.
- Aluminium Electrolytic devices (mainly capacitors) — Similar to batteries, the reaction between the metal compounds of the device induce immediate degradation of the device, therefore any storage conditions have little effect on the shelf life.
- PCBs – The surface finish determines the shelf life of PCBs. HASL, Gold, Silver, Tin, Organic all have different shelf lives, which are also dependent on packaging and storage. NOTE Windsor will only order PCBs when demand exists and where they are expected to be used within 3 months of receipt. No blank PCBs will be used if over 12-month-old without a soldering assessment and approval by the customer.

These rules are communicated to our Suppliers and are a condition of our purchases.

Our Goods-In Operatives are trained to look for and to Query/Reject old date code Components.

Account Managers/ Buyers are required to obtain written Customer approval when older date code Components are required to be used. For example, last time buys, fulfilling shortages in the Component market.



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