Environmental Compliance

International Manufacturing Services, Inc. (IMS) recognizes and supports the worldwide effort for environmental protection and conservation.

REACH Regulation

REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) is a European Union Commission (EUC) Regulation on chemicals and their safe use (EC 1907/2006) entered into force on 01 June, 2007 and will be phased in until 2018.

- REACH applies to all imports to the EU
- There are three levels of interest defined by REACH:
  - Substances: Chemical elements and their compounds in the natural state, identifiable by CAS or EINIC number (Ex: metal)
  - Preparations: A combination or mixture of two or more substances (Ex.: ink, adhesive)
  - Article: An object whose special shape, surface, or design determines its function to a greater degree than does its chemical composition; assembled products (Ex: cars, electronic components)
- The REACH regulation focuses on the control of Substances of Very High Concern (SVHCs) published in accordance with Article 59 of the REACH regulation
- SVHCs are relevant to Substances and Preparations, not Articles
- Registration of SVHCs is required for Substances and Preparations, not Articles
- Notification and communication are required for Articles under the following conditions:
  - The Article has an “intended release” of SVHC
  - SVHC content > 0.1% of Total Article Weight
- Annex XVII of the REACH Regulation contains the REACH Restricted Substance List along with the conditions of the restriction. IMS products contain none of the substances as listed and described under the conditions of restriction.

Products manufactured and supplied by IMS are “articles” as defined by the REACH regulation and do not release substances under their normal use. The diboron trioxide and lead oxide present in certain products supplied by IMS are an element of the glass material. The glass is a UVCB substance (substance of unknown or variable composition, Complex reaction products, or biological materials) under the REACH regulation. During the glass “melting” process the raw materials react chemically to become the material glass, rather than a mixture of the raw materials. The resulting glass is not identifiable by a CAS number. Therefore, the boron trioxide and lead oxide are not required to be reported under the REACH regulation. IMS products do not contain any of the currently listed SVHCs, as of the 253 item candidate list dated February 4, 2026. IMS will continue to monitor the REACH candidate list to maintain compliance with the REACH regulation.

RoHS

RoHS (Restriction of Hazardous Substances) originated in the EU and restricts the use of specific hazardous materials found in electrical and electronic (EE) products.

- The RoHS directive took effect July 1, 2006 and restricted the use of six hazardous materials: Lead (Pb), Mercury (Hg), Cadmium (Cd), Hexavalent chromium (Cr^{6+}), and Polybromated biphenyls (PBB) found in EE products

- The RoHS directive was expanded in July 2011, known as RoHS2, to cover all EE equipment, cables, and spare parts

- A further expansion, RoHS3, was published March 31, 2015 to add four additional restricted substances (phthalates)
    - These are Bis(2-ethylhexyl) phthalate (PBDE), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP)
- Exemptions for certain uses of the restricted chemicals were put in place where their prohibitions are technically or scientifically impractical

RoHS compliant products manufactured and supplied by IMS do not intentionally contain Mercury, Hexavalent chromium, Polybrominated biphenyls, phthalates, or free lead. The lead oxide present in certain products supplied by IMS remains bound in the glass phase of inorganic binder upon processing. This is covered by the glass exemption 7(c)–1, electrical and electronic components containing lead in a glass. The gold contacts of some IMS products contain Cadmium, which meets the exemption 8(b) of the RoHS directive for cadmium and its compounds in electrical contacts.

- RoHS compliance status is printed on the parts label as “RoHS Compliant”
- RoHS compliance status is indicated on data sheets and literature by ☑
- Specific RoHS Certificates of Compliance (C of C) are available on request

RoHS exemptions 7(c)-1 and 8(b) were originally scheduled for expiration on July 21, 2021. Due to the currently available raw materials these exemptions will be required past this July 2021 date. Industry wide concerned parties have submitted applicable renewal requests which are now under review by the EU RoHS Commission. The period of time that will be needed for the decision process to be completed is not known and these exceptions remain in effect until a decision is reached. IMS will continue to work with its raw material suppliers to obtain and evaluate materials that will not require the RoHS exceptions while also maintaining the high quality and performance characteristics of IMS products.

IMS supplies to a wide spectrum of applications and end users. These include military applications that prohibit the presence of 100% tin finish due to the risk of tin whiskering. For many of these applications the end user prefers or requires lead in the solder coating. By definition, these products are not RoHS6 compliant. The products that contain lead in solder are not labeled RoHS Compliant or indicated by ☑ and the RoHS status is indicated on the data sheets and literature.

Environmental Protection Agency (EPA) Toxic Substances Control Act Section 6(h)

No products from IMS contain, nor does IMS distribute, any prohibited chemicals (PBT’s) listed in the Environmental Protection Agency (EPA) Toxic Substances Control Act (TSCA), Section 6(h), published January 6, 2021.

- Decabromodiphenyl Ether (DecaBDE)
- Hexachlorobutadiene (HCBD)
- Phenol, Isopropylated Phosphate (3:1) (PIP 3:1)
- Pentachlorothiophenol (PCTP)
- 2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP)

California Proposition 65

California Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in November 1986. The intent is to protect California's drinking water from being contaminated by substances determined to cause cancer, birth defects, or other reproductive harm. Proposition 65 requires businesses operating in California to provide clear and reasonable warnings before knowingly and intentionally exposing Californians to substances contained in the list. The current list, dated December 29, 2023, contains more than 900 substances, and due to the large number of part numbers we supply, individual product level calculations are considered prohibitive for our business model. Although certain of our products contain Proposition 65 listed substances (such as lead oxide, PbO) there is no route of exposure during normal use, contact with skin or inhalation. Therefore, no labels are required warning against exposure that may cause cancer, birth defects, or other reproductive harm. Other uses of products supplied by International Manufacturing Services, Inc., (those outside of the recommended, normal use) may risk exposing people or companies operating in California to certain Proposition 65 substances if present. Therefore anything other than recommended normal use should be avoided.

Persistent Organic Pollutants (POP) (EU) 2019/1021

Persistent organic pollutants (POPs) are regulated worldwide by the Stockholm Convention and implemented in the European Union by the **"**Persistent Organic Pollutants (POPs)" regulation published on 20 June 2019 (EU/2019/1021). POPs are organic substances that persist in the environment, accumulate in living organisms, and pose a risk to human health and the environment. This regulation restricts the use of persistent organic pollutants in both chemical products and articles. No products from IMS contain, nor does IMS distribute, any chemicals prohibited by this regulation. IMS will continue to monitor and evaluate changes to the POPs regulation as implemented in the European Union.

Per- and Polyfluoroalkyl Substances (PFAS)

Per- and polyfluoroalkyl substances (PFAS) are a group of manufactured chemicals introduced in the 1940s that have been used in a wide range of consumer and industrial products. Epidemiological studies have linked PFAS to adverse human health effects. Due to these concerns, PFAS are highly regulated and banned or restricted in the US, EU, and Canada. Products from IMS do not contain, nor does IMS distribute, any PFAS chemicals.

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