

Dear Valued Supplier,

SOR Controls Group, Ltd. (SOR) recognizes that product-related environmental protection requires strict oversight in all phases of our product's life cycle – from conception, development, manufacture and use, to its end-of- life treatment.

To that end, SOR is committed to doing business with environmentally responsible suppliers as we recognize their critical role as partners in our environmental compliance program.

The growing list of legislation such as REACH, EU-RoHS3, China-RoHS2, and the US Conflict Minerals rule requires manufacturers and suppliers to provide information about restricted substances that are passed on through the supply chain. To that end, SOR has established rules and requirements for suppliers to declare whether products delivered to SOR contain any substance that may be restricted by any such legislation.

As a supplier to SOR, you are requested to review this document which outlines the supply chain requirements related to SOR's compliance with these laws and regulations. You may be subject to any or all of the requirements outlined.

# We request completion and return of the Certificate of Compliance (page 4 of this document) no later than thirty days after receipt.

We thank you in advance for your support in this matter. You are encouraged to direct any questions or concerns to:

Glenn Radmacher REACH, RoHS, WEEE and Conflict Minerals coordinator 913-956-3161 gradmacher@sorinc.com

Ryan Cahill

Environmental 913-956-3141 rcahill@sorinc.com

Sincerely,

Chris Poskin Chris Poskin Director of Supply Chain <u>cposkin@sorinc.com</u>



### SUPPLY CHAIN ENVIRONMENTAL COMPLIANCE

#### **KEY REGULATIONS**

As a supplier to SOR Controls Group, Ltd. (SOR), you are required to ensure that certain regulated or hazardous substances are not present in parts and materials you supply to us or, for certain other substances, to notify SOR if they are present.

Because the substance regulations are subject to frequent change, SOR has chosen not to publish an extensive list of restricted substances and exemptions. Rather, we have listed some of the key substance laws that impact us. We expect our suppliers to familiarize themselves with these laws and to ensure that parts and materials they provide to us comply with the laws.

**EU-RoHS3 and China-RoHS2:** The EU-RoHS3 Directive restricts the use of 10 hazardous substances in electronic equipment sold in the EU. RoHS restricts Lead, Mercury, hexavalent Chromium, and flame retardants PBB and PBDE, and plasticizers DEHP, BBP, DBP, and DIBP, to no more than 0.1% by weight in any "homogeneous material" in any part, and it restricts Cadmium to 0.01%. Some classes of electronic equipment are excluded from the scope of EU-RoHS3, and the EU-RoHS3 directive also allows exemptions for some very specific materials.

The China-RoHS2 Directive is similar in scope to the EU-RoHS3 Directive with some minor reporting differences.

SOR normally requires that all parts and materials supplied to us shall comply with the substance restrictions of the EU-RoHS3 and China-RoHS2 Directives, and that the supplier identify to us any exemptions that apply to those parts or materials.

**EU-REACH:** The REACH Regulation regulates a large number of substances, better known as SVHC's or "Substances of Very High Concern". Note that more substances are added to the Candidate List approximately every 6 months.

In addition, certain SVHC's are now subject to "Authorization", meaning that only certain narrowly-defined uses are authorized, or they are subject "Restriction", meaning that they are essentially banned from use. In order to meet requirements, SOR must know whether any SVHC constitutes greater than 0.1% of the weight of any part or product supplied to us. SOR also requires that parts and materials supplied to SOR shall not contain SVHC's that are subject to Authorization or Restriction.



**Conflict Minerals:** In 2012, the U.S. Securities and Exchange Commission published regulations implementing the Dodd-Frank Wall Street Reform Act. In order to meet the requirements of Section 1502 of that act, SOR must determine the country of origin for all Gold, Tin, Tungsten, and Tantalum (referred to as 3TG) used in our products. If any of these materials is sourced from a conflicted region, SOR must report this to our customers.

If you are a supplier of any of these materials, or parts containing any of these materials, you must provide a Declaration for Conflict Minerals to SOR.

## **General Requirements and Declarations**

As part of supplier qualification for SOR and on-going process evaluation, suppliers are required to complete and return a supplier Certificate of Compliance (CofC) letter (page 4 of this document). Suppliers signing the CofC letter must agree to the following:

- The supplier shall maintain an adequate working knowledge of the EU-RoHS3 and China-RoHS2 Directives, the REACH Regulation, and the Conflict Minerals Rule.
- The supplier shall ensure that any subcontractor engaged in the manufacture of parts or materials for SOR products shall abide by these same requirements.
- The supplier agrees to an SOR audit of the supplier's compliance assurance measures and records upon request, or as a part of a regular supplier audit.
- The supplier agrees to provide, upon request by SOR, declarations of compliance for parts and materials provided to SOR, and covering the applicable requirements specified in this document.

• If SOR determines that material provided by a supplier is not compliant, but the supplier has declared it to be compliant, then the supplier agrees to exercise commercially reasonable efforts to help SOR establish the root cause of the non-compliance, to remedy that root cause and actions resulting due to the non-compliance, and to replace any non-compliant material at no charge to SOR.



## Certificate of Compliance with Environmental Requirements from SOR

By signing below, the undersigned certifies that, for all parts and materials supplied to SOR Controls Group, Ltd. (SOR):

1. The supplier has read and understands SOR's Supply Chain Environmental Requirements and agrees to conform to all applicable requirements herein.

2. The supplier shall, unless otherwise authorized by SOR, ensure that all parts and materials provided by the Supplier are EU-RoHS3 and China-RoHS2 compliant, are free of any REACH SVHC's that are subject to Restriction or Authorization, and conform to the regulations of the Conflict Minerals Rule.

3. The supplier shall employ compliance methods that assure the compliance status of all parts and materials supplied to SOR.

4. The supplier agrees that any and all work sub-contracted on SOR's behalf shall be done with suppliers that also agree to certify to these same requirements.

5. The supplier agrees, to identify and document any parts or materials provided to SOR that are not in compliance with the EU-RoHS3, China-RoHS2, REACH, and Conflict Minerals regulations.

6. The supplier agrees to respond to additional requests made by SOR or their representative in a timely manner regarding the state of compliance for their products, in support of the EU-RoHS3, China-RoHS2, REACH, and Conflict Mineral requests.

Supplier Company Name:		
Signature:	Title:	
Printed Name:	Date:	

**Completed forms may be scanned and returned to the requesting party or to the following email address.** Email: <u>cposkin@sorinc.com</u>

#### Completed forms may be mailed to the requesting party or to the following address.

Director of Supply Chain SOR, Inc.



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