

Dear Customer

Edwards Policy on REACH and RoHS compliance

Ethical, sustainable business practices, and the legislation that supports them, are fundamental to Edwards and our customers. Within that context, the most common customer concerns relate to the following pieces of legislation:

REACH Regulation (EC) 1907/2006 covers the Registration, Evaluation, Authorisation and Restriction of Chemicals with the objective of protecting human health and the environment by regulating chemicals and their safe use. Restrictions result from risk based assessment of detailed research into the impact of a Substance through its entire lifecycle.

All our products are in the scope of and fully compliant with the requirements of this Regulation. Our policy is to provide products which do not contain Substances of Very High Concern (SVHC) above the 0.1% weight threshold specified by REACH wherever possible. When substances already in use are added to the Candidate List we comply with the Article 33 requirements and initiate work to identify, validate and implement alternatives while maintaining product performance.

EU RoHS Directive 2011/65/EU is a CE Mark Directive designed to reduce toxic electronic waste by prohibiting the use of specified hazardous substances above a defined level, unless a special Material Exemption exists. Originally limited to specific Categories of electrical and electronic equipment (EEE), the scope of this Directive is expanding. By July 2019 all EEE will be in scope unless specifically excluded.

China RoHS, the Management Methods for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products Order No. 32 does not prohibit the use of restricted substances other than for product listed in the Management Catalogue. Instead, the general requirement is for appropriate product marking and a Material Declaration where substances are present above the defined limits; these define the Environmentally Friendly Usage Period (EFUP), or safe working life under normal use, and indicate where the substances can be found to support safe recycling practices.

Our policy is to comply with EU RoHS ahead of any legal requirement, including non-electrical accessories and components. Compliance is stated in the EU Declaration of Conformity, a Material Declaration (in English) is available on request for non-electrical products. Our EEE available in China falls under the general requirements of China RoHS and is appropriately marked and, where required, supported by a Material Declaration (in Chinese).

In support of our commitments and policies, we have a rigorous supplier selection process and work closely with our supply chain to ensure the compliance of all procured substances and articles against this and other relevant legislation.

We are actively working on compliance with the requirements of Delegated Directive (EU) 2015/863, adding 4 phthalates to Annex II. Where we work with formulators for our bespoke branded lubricants, or act as distributor for a select range of other products, we verify REACH compliance and provide appropriate and current safety information to our customers in addition to our ongoing activity to maintain compliance under REACH.

At this time we have a limited number of thermal abatement systems (e.g. Atlas, eZenith) which contain Refractory Ceramic Fibres (RCF). These are fully enclosed within the product, and a suitable replacement is due to be launched shortly.

We use compact lithium coin cell batteries in all electronic equipment with real-time equipment monitoring capability. These batteries, containing 1,2-dimethoxyethane (EGDME) sealed within the case, are used for their long life and reliability characteristics. The substance is essential to the reliable performance of the battery; there are currently no known alternatives but we are actively monitoring battery technology developments to identify a suitable replacement.

Some of our products have components which include Lead (Pb), predominantly electronics with some Aluminium and Brass components, and all covered by valid EU RoHS Annex III Material Exemptions. Combined with intelligent material selection in our design processes, ongoing activity within the electro technical and materials technology industries support our commitment to remove this substance from our products.

For more information see the Environmental section of our Corporate Responsibility website at www.edwardsvacuum.com. You can also get in touch through your normal contact or online via www.edwardsvacuum.com/contact.

A handwritten signature in black ink, appearing to read 'Ian Stones'.

Ian Stones
Vice President, Technology