



SIERRA
WIRELESS™

RESTRICTED SUBSTANCES REQUIREMENTS

Executive Acknowledgment of Commitment

I am personally aware of my company’s level of compliance with the Restricted Substances Requirements of Sierra Wireless (this document) and affirm, on behalf of my company, that

(1) _____ having its principal place of business at
(2) _____ (“Supplier”)

is compliant with all of its terms.

- (1): Company name
- (2): Corporate Address

Please check this box if you are using BOMCheck <https://www.bomcheck.net/>

| | |
|---|--|
| Printed name (First name and Last name) | |
| Title | |
| Phone | |
| Email | |
| Date | |
| List of Goods which contain any of the regulated and/or restricted substances of any of the regulations and/or directives listed in this document | |
| Authorized signature | |

If different from above :

| | |
|--|--|
| Name of the Supplier’s Restricted Substances representative | |
| Email of the Supplier’s Restricted Substances representative | |

Please return signed form within three weeks to environmental_compliance@SierraWireless.com mailbox.



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Environmental Requirements for Suppliers

1. Environmental Regulations

- (a) Sierra Wireless is committed to environmental care in all of its operations. Therefore Sierra Wireless encourages the collection and qualified recycling of Goods at the end of their useful lives, by external certified parties.
- (b) Supplier shall not put in use above the legal thresholds the forbidden substances listed in any EU and US regulations, in the Materials, Components or Process relating to the manufacture of the Goods.
- (c) Supplier shall monitor evolution of the regulations and directives. In case modification of Good(s) is needed, Supplier shall inform Sierra Wireless through "Sierra Wireless Component PCN rules for suppliers" process. Phase out plans, including a final date of use, are required.
- (d) Supplier shall organize the identification of recyclability by marking materials
 - for packing material: using the identification letter as 94/62/EC + the recycle signs as defined in DIN6120 for plastics packing
 - for plastic Goods: using the recycle signs in DIN54840 (ISO 11469) (and in accordance with all applicable additional or replacement regulations from time to time in force).A recycle sign shall be introduced for all plastic parts with a weight > 50 g.
- (e) Supplier shall organize the identification of ROHS compliancy which can be done by specific marking on the Goods, on a label, or on a separate shipping document which identifies the Goods.

2. Environmental Warranties

Supplier warrants that Goods and their packaging are in compliance with environmental laws and regulations applicable to the Good(s). This includes:

- (a) The European Directive 2011/65/EU for Restrictions of Hazardous Substances (ROHS), including amendments and modifications. In particular, (i) directive 2015/863 amending annex II shall be applied and (ii) scope and dates of applicability of the exemptions listed in Annex III shall be checked as per article 5(2)
- (b) The European Regulation 1907/2006 concerning the Registration, Evaluation, Authorization and Restrictions of Chemicals (so called and herein referred to as "REACH"), including all amendments and modifications. In particular, (i) supplied parts shall comply with the Annex XIV of REACH and (ii) the substances contained in supplied parts shall comply with the conditions of restriction defined in the Annex XVII of REACH
<http://echa.europa.eu/addressing-chemicals-of-concern/>
- (c) The European regulation 1005/2009 on Ozone Depleting Substances amended by Regulation (EC)744/2010;
- (d) The European Directive 2006/66/EC on batteries and accumulators containing certain dangerous substances;
- (e) The European Directive 94/62/EC on packaging and packaging waste;
- (f) The European Directive 2012/19/EC on Waste of Electrical and Electronic Equipment;
- (g) The European Regulation (EC) 850/2004 on Persistent Organic Pollutants (POP) and its amendments, such as 756/2010, 757/2010 and 1342/2014; and



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- (h) The Banned or Restricted Substances listed in the IEC62474 list – “Criteria 1: Currently regulated”.
<http://std.iec.ch/iec62474/iec62474.nsf/MainFrameset>
- (i) The California’s Safe Drinking Water and Toxic Enforcement Act (commonly known at Proposition 65)
<https://oehha.ca.gov/proposition-65>

These requirements take pre-dominance above any other requests or Sierra drawing/documents. In case of conflict or questions, please send e-mail to environmental_compliance@SierraWireless.com.

3. Environmental Compliance Report

- (a) Supplier is responsible to guarantee that its Good(s) do not contain above the legal limits any of the regulated and/or restricted substances of any of the regulations and/or directives listed in chapter 2.
Supplier shall provide a copy of its compliancy certificates against the regulations/directives listed in chapter 2 for all the Goods delivered to Sierra Wireless or to Sierra Wireless’EMS.
Use of exemption(s) shall be clearly indicated. For example, for ROHS compliancy, if the Goods use any exemption listed in Annex III, the compliancy certificate(s) shall state which exemption(s) applies. Additionally, as exemptions listed in Annex III are no longer applicable after 21 July 2016, Supplier previously using any of those exemptions shall inform Sierra Wireless of Supplier’s compliancy action plan.
- (b) Usage of regulated and/or restricted substances, even if lower than threshold, shall be reported.
- (c) Supplier shall provide the material declaration for all of the Goods delivered to Sierra Wireless or to Sierra Wireless’EMS. Preferably the declaration shall be done through IMDS <http://www.mdssystem.com> (Sierra Wireless’ IMDs number is 24914), alternatively Supplier’s template can be used.
- (d) The regulated and/or restricted substances are updated on a regular basis. Supplier is therefore responsible to check after each update that the supplied Goods do not have any of the new added substances and shall inform Sierra Wireless in case a substance is present in any Good(s).
For example, in order to meet the requirement of the article 33(1) of REACH, Supplier shall anticipate the update of the SVHC list and check the “Submitted SVHC proposals” list (<https://echa.europa.eu/registry-of-submitted-svhc-intentions>, released in February and August)
Without notice from Supplier directly after an update of a regulation, Sierra Wireless will consider that no restricted substance(s) is/are present in the Goods shipped by Supplier to Sierra Wireless or to Sierra Wireless’EMS.
Example of regulation update: for Reach, update of the SVHC list or of annex XVII; for ROHS, update of the annex II or annex III; for Proposition 65, update of the List.
- (e) In case Supplier delivers Goods which contain any of the regulated and/or restricted substances of any of the regulations and/or directives listed on chapter 2, Supplier shall inform Sierra Wireless (i) upon execution of this letter, (ii) after each update of regulations.



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The same information shall be provided by Supplier when Good(s) are under evaluation by Sierra Wireless

Supplier shall inform Sierra Wireless by sending an email to environmental_compliance@SierraWireless.com

4. Conflict Minerals Compliance Program.

- (a) Supplier shall ensure that it is compliant with Sierra Wireless' Conflicts Minerals Policy, as may be amended from time to time and posted on Sierra Wireless' website on the following page:
<https://www.sierrawireless.com/company/corporate-social-responsibility/>
- (b) In furtherance of such policy, Supplier shall complete the "Conflict Minerals Reporting Template" (latest version) per The Electronic Industry Citizenship Coalition (EICC) and submit it to Sierra Wireless annually. Supplier may be requested to provide to Sierra Wireless, upon request, evidence of conflict free sourcing for any conflict minerals in the Goods.

Such evidence shall be provided to Sierra Wireless by sending an email to conflictminerals@SierraWireless.com

5. Other substances to be reported

In case Supplier delivers Goods which contain any of the substances identified below in paragraphs (a), (b) or (c), Supplier shall inform Sierra Wireless (i) upon execution of this letter, (ii) after each update of IEC62474 or GADSL or JS-709. The same information shall be provided by Supplier when Good(s) are under evaluation by Sierra Wireless.

Supplier controlled by Sierra Wireless shall inform Sierra Wireless by sending an email to environmental_compliance@SierraWireless.com

(a) Table of substances

| Substance | CAS number |
|---|------------|
| Any substances from IEC62474 "Criteria 2: For assessment" And "Criteria 3 – For Information only" | |
| Alkanes C14-C17, chloro, Medium Chain Chlorinated Paraffins (MCCP) | |
| Phthalate: Diethyl Phthalate (DEP) | 84-66-2 |
| Tris(1,3-dichloro-2-propyl) phosphate (TDCPP), | 13674-76-8 |
| Tri-o-cresyl phosphate (TOCP) or Tricresyl phosphate (TCP) | 1330-78-5 |
| Red phosphorous | 7723-14-0 |



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- (b) Halogen-free Compliance as per JEDEC standard JS-709.
- (c) Substance and material restrictions specified in the “Global Automotive Declarable Substances List” (GADSL) available at the following internet address: <http://www.gadsl.org>. Supplier shall declare all substances listed as “declarable” or “prohibited” as specified within GADSL.

Definition:

Goods: means the Goods provided by Supplier to Sierra Wireless or Sierra Wireless’ Authorized Manufacturing Partners (EMS, ODM or other type of manufacturer) and which are integrated into Sierra Wireless’ products.

Shall: “shall”, the imperative form of the verb, is used throughout this document whenever a requirement is intended to express a provision that is mandatory.

Revision:

| Revision | Date | Change |
|----------|-------------------|--|
| 01.06 | 01 July 2016 | First release |
| 01.07 | 12 January 2017 | Update of 3(d) and 5(a) |
| 01.08 | 30 June 2017 | Update of the table page 1 Add amendments for POP Update of the link for conflict minerals Add definition |
| 01.09 | 04 September 2017 | Add a second table page 1 Add definition of Shall Add reference to 744/2010 |
| 01.10 | 17 August 2018 | Add Prop65 Update WEEE directive reference |