

To Customer: _____

Product Type: _____

DECLARATION LETTER for EU REACH

欧盟 REACH 法案声明

Follow EU REACH REGULATION No.1907/2006, our products no volatile or intentionally release substances, nor chemicals or preparation directly export to EU, so our products no need to (pre-) registration, and our products will fully comply with EU REACH REGULATION No.1907/2006 and subsequent amendments. And we guarantee that all products provide by our company follow up substances of SVHC candidate list now, comply with SVHC 247 substances of batch 1-32 in a concentration less than 0.1% (w/w) in an article(Excluding RoHS exemption see detail*)(See full list in <https://echa.europa.eu/candidate-list-table>).

按照欧盟 REACH 法案 No.1907/2006, 我司产品无挥发性物质或有意释放物质、也非直接出口欧盟的化剂或配置品类物质, 因此均不涉及(预)注册问题, 完全符合欧盟 REACH 法案 No.1907/2006 及其后续修订要求。并且我司保证我司产品本身均满足当前高关注物质(SVHC)候选清单中的物质要求, 符合欧盟 REACH 法案要求的物品中第 1-32 批 247 类 SVHC 物质含量小于 0.1% 的要求(RoHS 豁免除外详见*)(完整清单 <https://echa.europa.eu/candidate-list-table>)。

If EU SVHC list update and confirm our products contain substances in the SVHC candidate list in a concentration over 0.1% (w/w), we will provide the relevant information in accordance with the SCIP requirements of Waste Framework Directive (WFD)(EU)2018/851. From 1st June 2011, we will notify ECHA through EU and EEA importers, if our products contain substances in the SVHC candidate list over 0.1%(w/w) and one substance in the products export to EU are over 1 ton in total per year per company, and which no alternative substances.

若随欧盟 SVHC 清单更新, 确认我司产品中存在含量大于 0.1% 的 SVHC 候选物质时, 我司将依据废弃物框架指令(WFD)(EU)2018/851 关于 SCIP 的要求提供相关信息。自 2011 年 6 月 1 日起, 若我司产品中存在含量大于 0.1% 的 SVHC 候选物质时, 将在确认出口欧盟的总量达到 1 吨/年/公司以上并且该物质无法替代的情况下, 通过欧盟范围内此类物品的制造商或进口商向欧盟化学品管理局 (ECHA) 进行通报。

* Information for lead(Pb): Lead-tin-silver high-temperature solder and paste used in medium / high-power packaging products and glass materials used in resistance components contain lead, which are currently exempted from RoHS regulations. The total amount of lead used exported to the EU is less than 1 ton/year, which complies with the requirements of REACH. In addition, our company will complete lead-free alternative before the exemption expires in accordance with the latest exemption period of RoHS regulations.

* 针对铅的说明信息: 中大功率封装产品使用铅锡银高温焊料焊膏和电阻类元器件所用玻璃料含铅, 目前属于 RoHS 法规豁免项目, 所用铅的出口欧盟总量小于 1 吨/年, 符合 REACH 法规要求, 且我司会按照 RoHS 法规最新豁免期限要求, 在豁免到期前完成无铅替代。

And up to now, as the best of our knowledge:

1. If product use flux such as Indium Tacflux026s, which use less than 70% nonylphenol(CAS No. 27193-86-8) in its initial chemical material, but the products which use flux are subject to the reflow process, and verification that the flux after reflow do not contain nonylphenol substances anymore, which comply with REACH SVHC limit.

2. If product use substrate material, BPA(CAS No.:80-05-7) impurity content less than 0.3% in laminate, or if use Taiyo ink solder mask material, 2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone (CAS No.:119313-12-1), 2-methyl-1-(4-methylthiophenyl)-2-morpholinopropan-1-one (CAS No.:71868-10-5) or Diphenyl(2,4,6- trimethylbenzoyl)phosphine oxide (CAS No.:75980-60-8) will be used as photo initiator for decompose and initiate polymerization, and Melamine (CAS No.:108-78-1) is used as an epoxy hardener, and the relevant product materials are subject to the reflow and curing process, the content of related substances in the final products are less than 0.1%, which comply with REACH SVHC limit.
3. If product use Henkel 8910T, 8920TC, 8062T, QMI519 and Sumitomo CRM-1800B, CRM-1850 epoxy, less than 1% of Bis(α,α -dimethylbenzyl) peroxide (CAS No.:80-43-3) used as polymerization initiator. If the product uses Henkel 8910T epoxy, less than 1% of Hexahydro-4-methylphthalic anhydride (CAS No.:19438-60-9) used for polymerization, and the related product materials will be treated by reaction curing process, and the content of related substances in the final product is less than 0.1%, which comply with REACH SVHC limit.
4. If product use Kyocera KE-G1250LKDS-30 U3, KE-G1250LKDS-TCW CL20 molding compound, less than 0.2% of Triphenyl phosphate (CAS No.:115-86-6) used as additives for regulating performance, and the related product materials will be treated by reaction curing process, and the content of related substances in the final product is less than 0.1%, which comply with REACH SVHC limit.
5. Follow ECHA notice D(2024)7663-DC, the original 21 batch substance item of "Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP)" has been updated to "Tris(4-nonylphenyl, branched and linear) phosphite (TNPP)".

到目前为止根据我公司确认：

1. 若产品有使用Indium Tacflux026s等助焊剂，在其初始化学材料中使用<70%的壬基酚(CAS No.:27193-86-8)物质，由于使用助焊剂的产品都会经过回流焊工艺处理，经验证助焊剂通过回流焊工艺处理后不再含有壬基酚相关物质，符合REACH SVHC限制要求；
2. 若产品使用基板材料，板材含有小于0.3%的双酚A(CAS No.:80-05-7)杂质；若产品有使用太阳油墨solder mask材料，会用到2-苄基-2-二甲基氨基-4'-吗啉基苯基丁酮(CAS No.:119313-12-1)、2-甲基-1-(4-甲基苯基)-2-吗啉基-1-丙酮(CAS No.:71868-10-5)或二苯基(2,4,6-三甲基苯甲酰基)氧化膦(CAS No.:75980-60-8)物质作为光引发剂分解并引发聚合反应，以及三聚氰胺(CAS No.:108-78-1)物质作为环氧固化剂。相关产品材料都会经过回流固化工艺处理，最终产品中相关物质含量小于0.1%，符合REACH SVHC限制要求；
3. 若产品使用汉高8910T、8920TC、8062T、QMI519以及住友CRM-1800B、CRM-1850装片胶，会使用小于1%的过氧化二异丙苯(CAS No.:80-43-3)作为聚合引发剂；若产品使用汉高8910T装片胶，会使用小于1%的4-甲基六氢苯酐(CAS No.:19438-60-9)作为聚合用。相关产品材料都会经过反应固化工艺处理，最终产品中相关物质含量小于0.1%，符合REACH SVHC限制要求；
4. 若产品使用京瓷KE-G1250LKDS-30 U3、KE-G1250LKDS-TCW CL20塑封料，会使用小于0.2%的磷酸三苯酯(CAS No.:115-86-6)作为性能调节的添加剂，且相关产品材料都会经过反应固化工艺处理，最终产品中相关物质含量小于0.1%，符合REACH SVHC限制要求；
5. 根据ECHA通告D(2024)7663-DC，原21批“三(壬基苯基)亚磷酸酯(TNPP)其中4-壬基苯酚(支链和直链)(4-NP)含量大于等于0.1%”的物质条目更新为“亚磷酸三(4-壬基苯基, 支链)酯”。

Note: Above declaration base on feedback of raw material supplier questionnaire、SDS、MCD or test report.
备注：以上保证声明以相关物料供应商调查回函、SDS、成分表或检测结果为依据。

Company stamp(公司盖章):

Person in Charge(负责人):

Date(日期):

