Compliance Statement for REACH, RoHS2, & Conflict Minerals

1. REACH (Registration, evaluation, authorisation, and restriction of chemicals).

At ESR Technology Limited we are fully committed to ensuring compliance with the European Union's Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), including all amendments, most recently EU Regulation 2025/1090.

Restricted Substances: DMAC and NEP

In accordance with Regulation (EU) 2025/1090, which amends Annex XVII of REACH by adding restrictions for N,N-dimethylacetamide (DMAC; CAS No 127-19-5) and 1-ethylpyrrolidin-2-one (NEP; CAS No 2687-91-4), ESR Technology Limited applies the following measures, where relevant to its activities:

- Conducted a comprehensive review of all materials, formulations, and production processes to identify any use of DMAC and NEP.
- If applicable, substituted DMAC and NEP in all relevant applications with compliant, less hazardous alternatives where technically and commercially feasible.
- For unavoidable uses, where applicable, implement appropriate operational conditions and risk-management measures to control worker exposure in accordance with the applicable Annex XVII restriction conditions and stated derived no-effect levels (DNELs).
- Obtain and maintain current supplier Safety Data Sheets (SDS), where applicable, and communicate relevant restrictions to affected personnel and supply-chain stakeholders.

General REACH Compliance Measures

To ensure ongoing compliance with REACH for all substances and mixtures handled by our company, we have established the following protocols:

- Maintain an up-to-date inventory of substances and mixtures used or imported by ESR Technology Limited, recording relevant REACH registration, exemption and restriction information where applicable.
- Require suppliers of chemical substances and mixtures to provide current, compliant Safety Data Sheets where legally required.
- Conduct risk assessments for all hazardous substances and apply appropriate risk management measures across our operations.
- Monitor and assess new entries to the Candidate List (SVHC), Authorisation List (Annex XIV), and Restriction List (Annex XVII).
- Train relevant employees, as applicable, on REACH responsibilities, changes to substance classifications and safe handling requirements.
- Maintain communication with upstream and downstream partners to ensure transparency and mutual compliance across the supply chain.

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ESR Technology Limited continuously monitors regulatory developments under REACH and takes proactive steps to meet all applicable obligations. We are committed to the safe use of chemicals and to protecting human health and the environment throughout our operations.

2. Electrical and Electronic Equipment Directive (RoHS2)

RoHS Directive (Directive 2011/65/EU as amended, including Directive (EU) 2015/863)

The Restriction of Hazardous Substances (RoHS) Directive (Directive 2011/65/EU, as amended) restricts the use of specific hazardous substances in electrical and electronic equipment (EEE) to protect human health and the environment, particularly by reducing hazardous waste and exposure during manufacturing, use, and disposal of EEE.

The Directive is also a component of the EU's CE marking framework and requires that applicable EEE products bear the CE mark to indicate conformity with RoHS and other applicable EU legislation.

Electronic and electrical parts or equipment purchased by ESR Technology Limited are not assumed to be compliant solely because they are commercially available. Where practicable and proportionate to the intended use, ESR Technology Limited will obtain appropriate supplier evidence, such as a RoHS declaration, material declaration or Certificate of Conformity.

ESR Technology Limited does not manufacture or supply electronic parts or electrical and electronic equipment (EEE). Where ESR Technology Limited purchases electronic parts or EEE for use in its activities or for incorporation into deliverables, it will take reasonable steps, where practicable, to verify that the purchased items meet applicable RoHS requirements and specified customer requirements.

Procurement assurance for electrical and electronic parts and equipment

Where practicable, ESR Technology Limited will specify applicable RoHS requirements when purchasing electronic parts or EEE and will retain available supplier compliance evidence appropriate to the item, its intended use and any customer or contractual requirements.

RoHS currently restricts the following ten substances in homogeneous materials, subject to the scope, exclusions and exemptions of the Directive:

Substance	Maximum Allowable Concentration (by weight in homogeneous materials)
Lead (Pb)	0.1%
Mercury (Hg)	0.1%
Cadmium (Cd)	0.01%
Hexavalent chromium (Cr^{6+})	0.1%
Polybrominated biphenyls (PBB)	0.1%
Polybrominated diphenyl ethers (PBDE)	0.1%
Bis(2-ethylhexyl) phthalate (DEHP)	0.1%
Butyl benzyl phthalate (BBP)	0.1%

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Substance	Maximum Allowable Concentration (by weight in homogeneous materials)
Dibutyl phthalate (DBP)	0.1%
Diisobutyl phthalate (DIBP)	0.1%

Procurement Controls

Where RoHS is applicable to purchased electronic parts or EEE, ESR Technology Limited will apply the following controls where practicable and proportionate:

- Request supplier evidence of RoHS compliance, such as a declaration, material declaration, Certificate of Conformity or equivalent documented confirmation.
- Undertake additional due diligence, and where justified testing, when the item, supplier information, customer requirements or identified risk warrants further verification.
- Retain relevant procurement specifications and supplier compliance evidence in accordance with applicable contractual and record-retention requirements.
- Review relevant changes in supplier information, product composition or legislation that may affect the compliance status of purchased items.
- Provide appropriate awareness or training to personnel involved in specifying, purchasing or accepting applicable electronic parts and EEE.
- These controls relate to procurement assurance and do not represent a declaration that ESR Technology Limited manufactures or places EEE on the market.

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3. Responsible Sourcing of Conflict Minerals

Responsible Sourcing of Conflict Minerals (3TG: Tin, Tantalum, Tungsten, and Gold)

ESR Technology Limited is fully committed to the responsible sourcing of minerals and supports efforts to prevent the financing of armed conflict and human rights abuses associated with the extraction and trade of conflict minerals.

ESR Technology Limited supports the principles of responsible mineral sourcing reflected in Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and Regulation (EU) 2017/821. Where applicable to its supply chain and customer requirements, ESR Technology Limited takes reasonable steps to avoid knowingly procuring or using tin, tantalum, tungsten or gold (3TG) that finance armed conflict or contribute to human rights abuses in conflict-affected and high-risk areas.

Where applicable and proportionate, ESR Technology Limited conducts reasonable country-of-origin enquiries and supply-chain due diligence aligned with OECD guidance. This may include requesting information from suppliers about the source of 3TG contained in purchased materials, parts or products.

Our Commitment:

- We do not knowingly procure or supply materials, parts or products containing 3TG that directly or indirectly support armed conflict or human rights abuses in conflict-affected and high-risk areas.
- We require our suppliers to source minerals responsibly and to provide declarations using the **Responsible Minerals Initiative (RMI)** Conflict Minerals Reporting Template (CMRT), where applicable.
- We avoid **de facto embargoes** by supporting legitimate, conflict-free sourcing from artisanal and small-scale mining operations in CAHRAs, where aligned with OECD guidance.
- We aim to support initiatives that promote transparency, traceability, and the development of conflict-free supply chains.

ESR Technology Limited monitors relevant developments in conflict-minerals regulation and responsible-sourcing practice and works with suppliers and customers, where applicable, to promote transparency and responsible sourcing across its supply chain.

4. Related documents

Slavery and Human Trafficking Statement	PS11
Environmental Policy Statement	PS06

Raghbir Chand

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Date: 2026.10.19 10:46:53 +01'00'

Managing Director:

(Name, Signature & Release Date) _____