

R.E.A.C.H Policy Statement

APC Technology Group plc is a distributor of specialist electronic components.

This document sets out our current policy regarding 'R.E.A.C.H' EC1907/2006 (Registration, Evaluation, Authorisation and Restriction of Chemicals) legislation (EU REACH) and its subsequent amendments, The REACH etc. (Amendment etc.) (EU Exit) Regulations 2019 (UK REACH) and its subsequent amendments, in outlining the process that the Company undertakes to ensure the fulfilment of our obligations.

APC is a distributor of specialist electronic components and does not have an involvement in the design and manufacture of the products we supply. We consider our activity being described primarily as an 'importer' of 'Articles' into the EU under the terms of R.E.A.C.H, although for some products sourced from within the EU our role is that of 'distributor'.

APC does not produce 'substances' (chemicals) or 'preparations' (mixtures or solutions of substances) as described in R.E.A.C.H. We recognise most electronic components as 'articles' (objects whose form defines its function to a greater degree than their composition – in general 'a finished product') under the terms of R.E.A.C.H.

Electronic components do not 'intentionally release' substances during their use, and so on this basis registration of such articles with the European Chemicals Agency (ECHA) is not normally required. Our R.E.A.C.H policy is based upon the following principles:

Principles

APC liaises with its principals and suppliers to:

- Create awareness of obligations under the Regulation.
- Establish how R.E.A.C.H may impact ongoing supply.
- Ensure that any obligations under R.E.A.C.H are met.
- Secure early notice of any threatened product withdrawal resulting from the R.E.A.C.H legislation.
- Agree a process for ensuring that any substances appearing on the regulations 'Candidate List' of Substances of Very High Concern (SVHC) are identified and notified where appropriate in the form of a controlled current Safety Data Sheet (SDS).

When necessary this information will be communicated to our customers, particularly in the case of the presence of SVHC. APC represents a large number of manufacturers of a very large range of electronic components. Under the requirements of R.E.A.C.H legislation we will provide appropriate safe use information at the time of supply for products where we have been advised they contain a 'substance' that is either:

- Classified as dangerous under the Regulation (EC) No 1272/2008.
- Is regarded as a PBT or vPvB as described in Annex III of R.E.A.C.H.
- Included in the European Agency's "Candidate List" of SVHC.

APC will maintain records relating to the supply of articles containing notifiable levels of candidate list SVHC in line with the requirements of R.E.A.C.H.

APC will make reference to the R.E.A.C.H status of the supplied products (as appropriate) within our delivery documentation.

The management team endorses this policy statement and is fully committed to its implementation, and to review this policy statement and update when necessary.