



ARS-510	REGULATED SUBSTANCES		
Date:	02/27/2024	REV	B

Summary

Document used to define regulatory environmental compliance requirements for products procured or manufactured by Agility Robotics.

Revision History

Rev	Content added/Changes	Date	Initials
A	Release	2021-12-14	KP
A.1	Updates in Packaging Materials and Batteries Directive sections, editorial revisions in other sections	2024-01-10	LW
B	Formatting update with new AR document template	2024-02-27	LW

Table of Contents:

1. Purpose and Scope
2. General Requirements

PROPRIETARY AND CONFIDENTIAL

THIS DOCUMENT AND THE INFORMATION CONTAINED IN IT ARE CONFIDENTIAL AND CANNOT BE COPIED OR DISCLOSED IN WHOLE OR PART WITHOUT THE EXPRESS WRITTEN CONSENT OF AGILITY ROBOTICS.

	ARS-510	REGULATED SUBSTANCES	Rev:	B
			Date:	02/27/2024

1. Purpose and Scope

Agility Robotics, Inc. is committed to designing and manufacturing products that are socially and environmentally responsible. Our supply chain has a key role in supporting us in achieving this mission.

We require our suppliers to adhere to this Regulated Substances Specification which lists the global restrictions and declarations on the use of certain chemical substances and/or materials in our products, accessories, manufacturing processes, and packaging used for shipping products to our customers. These restrictions are based on international and national laws or directives which apply to our products. Please note that these regulations and directives are constantly changing, and we expect our suppliers to declare compliance to the latest edition of the below mentioned.

We hold our suppliers accountable for the accuracy of the information they provide in the form of Declaration of Conformity (DoC), company statement, or third-party issued Certificate of Compliance (CoC) documents. As needed, we may verify the conformity by conducting factory audits, or testing components at independent laboratories.

2. General Requirements

2.1. [EU RoHS](#)

The EU restriction of the use of certain hazardous substances in electrical and electronic equipment, 2011/65/EU amended by delegated (EU) 2015/863 restricts the use of 10 hazardous substances in electronic equipment sold in the EU. RoHS restricts **Lead, Mercury, Hexavalent Chromium, PBB, PBDE, DEHP, BBP, DBP and DIBP**, to no more than **0.1% concentration value by weight** and restricts **Cadmium** to **0.01% concentration value by weight** in any "homogeneous material" in any part.

RoHS allows exemptions of certain materials and applications. Most exemptions have expiration dates.

- A declaration of conformity for all parts and materials shall be provided.
- The declaration must include:
 - Proper legislative reference to the RoHS directive (must include reference to all applicable standards in description).
 - Reference to the part(s) being declared.
 - Compliance status.
 - Exemptions (where applicable).

2.2. [EU REACH](#)

Regulation (EC) No 1907/2006 - Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) amended by **Regulation (EC) No 1272/2008** regulates "Substances of Very High Concern", better known as SVHCs. SVHCs are to be declared if they are present in an article above 0.1% of the article's weight.

Approximately twice a year, more substances are added to the Candidate List of SVHCs.

- A declaration of conformity for all parts and materials shall be provided.
- The declaration shall include:

Document No.: ARS-515	Regulated Substances	Revision: B
-----------------------	----------------------	-------------

	ARS-510	REGULATED SUBSTANCES	Rev:	B
			Date:	02/27/2024

- o Proper legislative reference to the REACH Regulation including the version/date of the SVHC list.
- o Reference to the part(s) being declared.
- o Compliance status regarding presence of SVHCs in the parts
- o Identification of any SVHC constituting greater than 0.1% of the weight of any article/part.
- o Parts and materials shall not contain SVHCs subject to Authorization or Restriction.

2.3. Packaging Materials

All packaging materials including those used with products that are pre-packaged to be sold “as-is” shall meet all applicable requirements per Directive **94/62/EC** and its amendment, **(EU) 2018/852**.*

- A declaration for all packaging materials including those contained in pre-packaged products for pass-thru sales stating that the included packaging meets directive requirements shall be provided.
- The declaration shall state the overall % of recyclable material and % of each specified material used for the packaging.

*Percentage of overall recyclable material by mass and percentage of each specified recyclable material to be used in product packaging prescribed by the EU Packaging Directive.

	Current targets (%)	By 2025 (%)	By 2030 (%)
All packaging	55	65	70
Plastic	25	50	55
Wood	15	25	30
Ferrous metals	50 (incl. Al)	70	80
Aluminium	-	50	60
Glass	60	70	75
Paper and cardboard	60	75	85

2.4. Batteries Directive (to be repealed in 2025) & New Batteries Regulation (entered into force 8/17/2023)

EU Council Directive **2006/66/EC** on Batteries and Accumulators containing certain dangerous substances restricts the use of mercury in all batteries and the use of cadmium in portable batteries, with certain exceptions. It requires that batteries be labeled with: (i) the chemical symbols Hg, Pb or Cd, (ii) a crossed-out wheellie bin and (iii) a capacity label.

The new battery regulation **(EU) 2023/1542** contains requirements on design, information and traceability, end of life, and manufacturer’s due diligence.

- A declaration of conformity shall be provided.

Document No.: ARS-515	Regulated Substances	Revision: B
-----------------------	----------------------	-------------

	ARS-510	REGULATED SUBSTANCES	Rev:	B
			Date:	02/27/2024

- The declaration shall include:
 - o Proper legislative reference to the directive.
 - o Reference to the part(s) being declared.
 - o Additional documentation substantiating the declaration.
- The battery shall be marked as applicable.

2.5. [TSCA](#)

The **Toxic Substances Control Act of 1976 (TSCA)** regulates the manufacture, import, distribution, use, release, and disposal of new and existing chemicals in U.S. commerce. Manufacturers must document the use of restricted substances in parts, materials, and products; communicate the presence of banned or restricted substances to customers and evaluate consumables and maintenance parts used for U.S.-based manufacturing and warehouse operations to determine if they contain in-scope substances.

- A declaration of conformity for all parts and materials shall be provided.
- The declaration shall identify all fully or partially restricted substances or substance families per TSCA. If none is present in the parts and materials supplied, a declaration stating the same is required.

More on [TSCA Section 6\(h\)](#)

2.6. [California Proposition 65](#)

Proposition 65 requires businesses to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm. These chemicals can be in the products that Californians purchase, in their homes or workplaces, or that are released into the environment.

- A declaration for all parts and materials shall be provided.
- The declaration must identify all Prop-65 chemicals that are present in the parts and materials being supplied. If none are present in the parts and materials supplied, a declaration stating the same is required.

2.7. [U.S. Conflict Minerals](#)

The SEC rules on Conflict Minerals, under **Dodd-Frank Section 1502**, requires that U.S. publicly traded companies disclose their use and source of conflict minerals that originate from the Democratic Republic of the Congo (DRC) or adjoining countries. The conflict minerals are tantalum, tin, tungsten and gold, also known as 3TG. 3TG needs to be disclosed if they have been “intentionally added and necessary to the functionality or production of a product”.

- If a part or material contains any of the 3TG minerals, then the supplier is required to provide an EICC/GeSI Conflict Minerals Report Template (CMRT) in the most current released version.

Document No.: ARS-515	Regulated Substances	Revision: B
-----------------------	----------------------	-------------