

22nd January, 2026

Dear Valued Customers,

Environmental Statement for IC Products

Axiro Semiconductor Private Limited and its subsidiaries (“Axiro”) are committed to environmentally responsible practices within their own operations and to promoting such practices across their supply chain. Axiro conducts assessments of its outsourced manufacturers to ensure compliance with RoHS and REACH requirements. In addition, further assessments are carried out, as needed, to verify compliance with customer-specific requirements.

Restriction of Hazardous Substances (RoHS)

Use of certain hazardous substances in electrical and electronic equipment is restricted by Annex II of Directive 2011/65/EU, as amended by Directive (EU) 2015/863 – Annex II (“RoHS”). To the best of Axiro’s knowledge, its products are in compliance with RoHS. RoHS restricted substances and their maximum concentration values tolerated by weight in homogeneous materials are as follows:

RoHS Restricted Substances	Chemical Symbol	Limit *note 1
Lead	Pb	1000ppm
Mercury	Hg	1000ppm
Cadmium	Cd	100ppm
Chromium ⁺⁶	Cr ⁺⁶	1000ppm
Polybrominated Biphenyls	PBB	1000ppm
Polybrominated Diphenyl Ethers	PBDE	1000ppm
Bis(2-ethylhexyl) phthalate	DEHP	1000ppm
Butyl benzyl phthalate	BBP	1000ppm
Dibutyl phthalate	DBP	1000ppm
Diisobutyl phthalate	DIBP	1000ppm

Note 1: Maximum limit does not apply to applications by RoHS exemption.

References:

Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment
Commission Delegated Directive (EU) 2015 / 863 of 31 March 2015 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances.

Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)

The microelectronic components are considered to be “articles” under Regulation (EC) No. 1907/2006 (the “REACH Regulation”). As Axiro’s products do not release any substances during normal and reasonably foreseeable conditions of use, they are not subject to registration under the REACH Regulation, nor is Axiro required to notify the European Chemicals Agency (“ECHA”) under Article 7 of the REACH Regulation.

To the best of Axiro’s knowledge, Axiro’s products [and packing materials used for shipping these products] do not contain:

(1) any substances included in the Substances of Very High Concern (SVHC) candidate list (SVHC) published by the ECHA in a concentration greater than the regulatory threshold of 0.1% percent *see Appendix; or
(2) any substances listed in Annex XVII of the REACH Regulation above the regulatory thresholds.

References:

Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December, 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)
Directive 2002/95/EC of the European Parliament and of the Council of 27 January, 2003 on the restriction of the use of certain hazardous substances in electrical and electronic equipment.

Toxic Substances

Axiro products do not contain any of the below listed 5 PBT substances as restricted under US Code of Federal Regulations title 40, part 751

- 2, 4, 6-tris(tert-butyl)phenol (2,4,6,-TTBP); CAS # 732-26-3
- Decabromodiphenyl etherDecabromodiphenyl ether (DecaBDE); CAS # 1163-19-5.
- Phenol, isopropylated phosphate (3:1) (PIP(3:1)); CAS # 68937-41-7
- Pentachlorothio-phenol (PCTP); CAS # 133-49-3
- Hexachlorobutadiene (HCBD); CAS # 87-68-3

Reference:

“Regulation of Certain Chemical Substances and mixtures under section 6 of The Toxic Substances Control Act” (TSCA).

POP Substance:

Stockholm Convention on the Persistent Organic Pollutants

Axiro products do not contain the chemicals listed in Annexes A of the Stockholm Convention on Persistent Organic Pollutants (POPs).

We also confirm that our products do not contain any substances that are designated as EU POPs.

Reference:

Stockholm Convention on persistent organic pollutants (POPs)

Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (recast) (Text with EEA relevance) (POPs Regulation)

Contact:

If you need further information regarding the subject matter of this Environmental Statement, please submit your enquiry to compliance@axiro.com, or contact the individual listed below:

Signed by:



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Naveen Yanduru

Chief Executive Officer

Axiro Semiconductor Private Limited

Appendix: List of SVHCs for possible use

Except for the below-mentioned substances, our products do not contain any SVHCs listed in the following URL.

<https://echa.europa.eu/candidate-list-table> (As of November 5, 2025, it contains 251 substances).

substance	CAS
1-Methyl-2-pyrrolidone (NMP)	872-50-4
Diboron trioxide	1303-86-2
Lead monoxide (lead oxide)	1317-36-8
4,4'-isopropylidenediphenol	80-05-7
Lead	7439-92-1
Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with ≥ 0.1% w/w of 4-nonylphenol, branched and linear (4-NP)	None
2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone	119313-12-1
Melamine	108-78-1
Diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide	75980-60-8
Bis(α,α-dimethylbenzyl) peroxide	80-43-3