Elmos Group statement on Substance & Material Compliance policy

Elmos Semiconductor SE Group statement on Substance & Material Compliance policy

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Aim and scope

Elmos Semiconductor SE (hereafter Elmos) is committed to supplying safe, sustainable, and compliant products. We do not tolerate any malpractice in our supply chain and proactively comply with all relevant national and international laws and regulations regarding product and material composition.

This policy applies to all components, materials, and finished products procured, manufactured, or marketed by or on behalf of Elmos Semiconductor SE. This specifically includes:

-> **Chemical and Product Restrictions (Substance Compliance):** Full compliance with restrictive legislation, such as the REACH Regulation (1907/2006), the RoHS III Directive (2015/863), and the ELV (End-of-Life Vehicles) Directive (2000/53/EC), including any future updates.

-> **Critical Raw Materials (Material Traceability):** Monitoring, reporting, and, where possible, reducing or responsibly sourcing critical materials, including rare earth elements and conflict minerals, in accordance with international guidelines and due diligence obligations.

Restriction of Hazardous Substances (ELV, RoHS)

Elmos declares that no substances are “intentionally added” to any products supplied to its customers and/or subsidiaries, in accordance with the annexes to the ELV and ROHS III directives, unless otherwise provided in the regulations. The following substances, permitted to a limited extent, have the following maximum concentration values tolerated in homogeneous materials (on a weight basis):

ROHS restricted substance	Maximum allowable Limit
Cadmium and its compounds	0.01 % (100 ppm)
Lead and its compounds	0.1 % (1,000 ppm)
Mercury and its compounds	0.1 % (1,000 ppm)
Hexavalent Chromium and its compounds	0.1 % (1,000 ppm)
Polybrominated Biphenyls (PBB)	0.1 % (1,000 ppm)
Polybrominated Diphenyl Ethers (PBDE)	0.1 % (1,000 ppm)
Bis(2-ethylhexyl) phthalate (DEHP)	0.1 % (1,000 ppm)
Butyl benzyl phthalate (BBP)	0.1 % (1,000 ppm)
Dibutyl phthalate (DBP)	0.1 % (1,000 ppm)
Diisobutyl phthalate (DIBP)	0.1 % (1,000 ppm)

The term "intentionally added" here means: Deliberately used in the formulation of a material or component, where its continued presence in the final product is desired to provide a specific property, appearance, or quality.

California Proposition 65

Elmos continuously monitors the material composition of its semiconductor components based on information from its supply chain. Some products may contain traces of substances (such as traces of lead in wires and lead frames) listed under California Proposition 65. For reason these substances are structurally bound or encapsulated within the component, normal handling and foreseeable use of the component do not result in human exposure. Consequently, no exposure is expected that requires a warning. Therefore, it is not necessary to provide Elmos products with a warning label in accordance with California Proposition 65.

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

The microelectronic components manufactured by Elmos are considered as articles and therefore not subject to registration under the REACH Regulation (Registration, Evaluation, Authorization and Restriction of Chemicals, Regulation EC/1907/2006). The products we supply do not contain substances such as those listed on the most recent Candidate List of the European Chemicals Agency (see the ECHA website) in accordance with Article 59 (1,10) of Regulation EC/1907/2006 (REACH), in a concentration of more than 0.1% w/w. This includes substances in the Candidate List of Substances of Very High Concern (SVHC) published by ECHA on February 4, 2026 and all substances listed in Annex XVII of the REACH Regulation. According to Article 7(3), notification is not required as exposure to humans or the environment under normal or reasonably foreseeable conditions of use, including disposal (disposal phase of electronic products is covered in the European Union by the WEEE Directive 2002/95/EC), can be excluded for Elmos semiconductor products.

Use of "rare earths" in microelectronic products of Elmos

Elmos does not deliberately add any chemical elements from the group of the so-called "rare earths" to any of our products. There may be traces of rare earths in certain ceramic packages, but we do not make the actual ceramics, nor are they intentionally added.

Persistent Organic Pollutants (POPs)

Elmos strives for product conformity with regard to EU regulations on persistent organic pollutants (POPs).
Based on internal information, international legislation and controlled released materials provided by our suppliers, a number of Elmos products do contain substances which are subject to prohibitions or restrictions under the following global frameworks:

-> **EU POPs Regulation (EU) 2019/1021** (including all subsequent amendments and Commission Delegated Regulations amending Annex I).
-> **UNEP Stockholm Convention** on Persistent Organic Pollutants (Annex A, Annex B, and Annex C).

These substances are fluorinated compounds: perfluorooctanoic acid (PFOA) and perfluorohexanesulfonic acid (PFHxS), which are present as ingredients in epoxies (three epoxy types) for chip bonding, in gel (one gel type applied in cavity products) and in the chip passivation layer (2 polyimide type). Other materials used in Elmos packages are PFAS-free.

Since July 2026, Elmos has qualified and released a new PFAS-free (PFOA/PFHxS-free) epoxy for chip bonding for series production, which has been added to the existing list of PFAS-free epoxies. A replacement plan has been initiated for materials containing PFAS. The aimed timeline for the replacement plan for polyimide passivation layer is end of 2026 and for epoxy chip bond materials first quarter of 2028. The exact replacement date for individual projects depends partly on product qualification and the progress of process change notes.

No replacement plan is available for gel-containing products due to a lack of a suitable alternative.

Elmos Semiconductor SE employs a comprehensive system for material conformity. We assess material compositions on legal requirements during the product design phase on usage, prior to series production. During serial production we control material compositions in our upstream chain via process change notes (PCN).

While Elmos Semiconductor SE implements commercially reasonable steps to verify chemical composition, we rely on technical certification data from third-party suppliers and regularly on independent laboratory analysis. Such certification data is assessed during supplier audits.

OUR POINT OF CONTACT FOR EU DIRECTIVES:

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