

Roadmap and Control for the Implementation of the European RoHS Directive

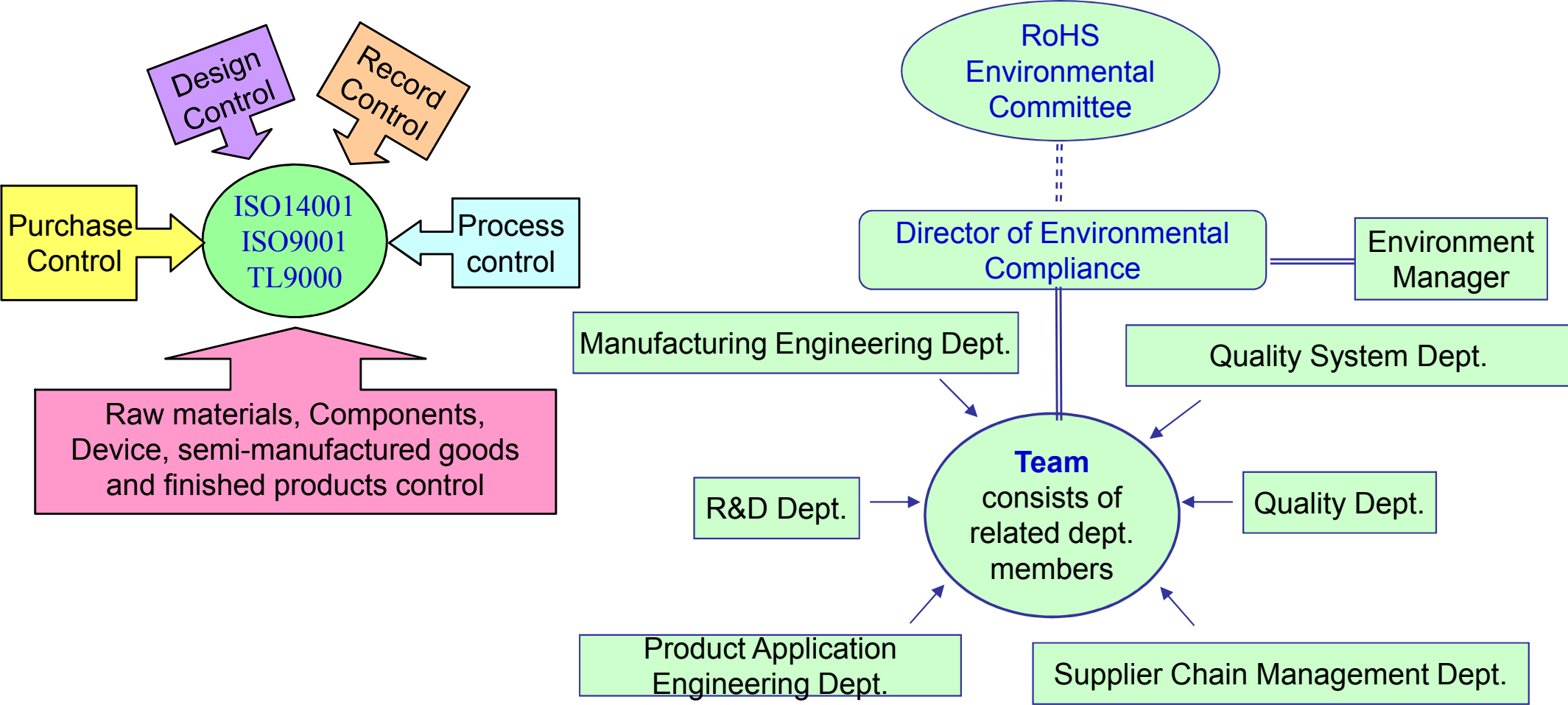
Revision, December 2015

NeoPhotonics



1.RoHS Control System and Organization:

- NeoPhotonics incorporates RoHS control requirements into the system of **TL9000**, **ISO9001** and **ISO14001**;
- NeoPhotonics has established a **RoHS Environmental Committee** Organization to oversee compliance and operational improvements



2. RoHS Compliant Control for Product:

◆ A) Raw Material RoHS Control:

- ✓ Vendors are required to submit RoHS/Environmental compliance declarations for raw materials.
- ✓ Vendors must supply a third-party hazardous/banned substances concentration report for raw materials.
- ✓ Vendors must supply Certificate of materials(IPC,MSDS...) for raw materials.
- ✓ NeoPhotonics will use XRF to inspect incoming materials or submit incoming materials to third-party organization to have chemical analysis for RoHS banned substances concentration if the XRF method can't be used on certain materials or substances.

◆ B) Audit suppliers RoHS system:

- ✓ NeoPhotonics will define RoHS assessment requirements for materials vendors and audit and assess suppliers periodically.

◆ C) RoHS Control in the process:

- ✓ NeoPhotonics will implement environment-friendly processes with no use of banned substances products in the course of manufacturing.
- ✓ NeoPhotonics will promote the use of RoHS compliant and environmentally-friendly materials, including the use of RoHS compliant adhesives, soldering materials and environmentally-friendly liquids.