

INTRODUCTION

At Philips Lighting, we have been working to minimize the environmental impacts of our products, processes and services since 1970. Guided by the precautionary principle, Philips Lighting's philosophy is "prevention is better than cure". This means where there are threats of serious or irreversible harm to the environment and/or human health, the lack of scientific certainty should not be used as a reason for postponing cost-effective preventive measures. Policies can be developed that may go beyond legislative compliance based on scientific evidence and stakeholder consultation. Decisions to seek alternatives take into account the level of concern, commercial availability and technical feasibility of alternatives.

The above-mentioned policies are reflected in the present policy requirement document, the "Philips Lighting Regulated Substances List" (or RSL), applicable for Products and Product-Packaging.

This or newer versions of the present RSL List can be found at Philips Lighting website downloads:

http://www.lighting.philips.com/main/company/about/sustainability/product-compliance.html

Changes of this RSL compared to previous versions are mentioned in Annex 4 of this document.

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1 INTRODUCTION

At Philips Lighting, we have been working to minimize the environmental impacts of our products, processes and services since 1970. Guided by the precautionary principle, Philips Lighting' philosophy is "prevention is better than cure". This means where there are threats of serious or irreversible harm to the environment and/or human health, the lack of scientific certainty should not be used as a reason for postponing cost-effective preventive measures. Policies can be developed that may go beyond legislative compliance based on scientific evidence and stakeholder consultation. Decisions to seek alternatives take into account the level of concern, commercial availability and technical feasibility of alternatives.

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Changes of this RSL compared to previous versions are mentioned in Annex 4 of this document.

1.1 Purpose

This document contains the Philips Lighting Regulated Substances List and its annexes as part of our commitment to health, safety and the environment.

The list contains product substance requirements related to:

- Federal, state, county or municipal law, regulation, ordinance or code, and
- Philips Lighting own requirements

The RSL is part of Philips Lighting global policy and therefore included in Philips Lighting general purchasing conditions. Each supplier and brand licensee is required to ensure product compliance with this list. In addition, Philips brand licensees are expected to comply with all additional legal substance regulations that are specific to their business and may not be included in the RSL.

Additional specific Philips Lighting or legal requirements may apply for certain product categories or applications. Examples are materials that come in contact with food, biocides or materials treated with biocides or products to be used for patients, babies or little children, chemical based products and cosmetics.

The most stringent legislation on which the threshold values have been based, are mentioned in the Tables of the RSL. Further information on legislation is given in some of the footnotes and particularly in the BOMcheck Declaration Tool. (this is a not exhaustive list but only an indication).

Philips Lighting collects compliance data in accordance with the RSL at the part level for every product or product-packaging delivered to Philips Lighting by a web-based Declaration Tool called BOMcheck as described in Section 2.1. Philips Lighting strongly recommends its brand license partners to use BOMcheck.

The RSL is aligned with the substances included in the BOMcheck Declaration Tool. The few deviations from BOMcheck version 5 compared to the current version of the RSL are shown in Table 0. The deviations as mentioned in Table 0, are only for consumer products in some very specific applications. Annex 4 of this RSL mentions the changes compared to the previous version.

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TABLE 0: Additional substance restrictions in product related applications in RSL compared to BOMcheck

Substances	Additional requirements in RSL compared to BOMcheck		Reason for deviation	
Substances	Table	Maximum Concentration Limit in ppm (mg/kg)		
Brominated Flame Retardants <u>restricted</u> in consumer products	6 and 7	900	Additional restriction of Brominated Flame Retardants in printed wiring board laminate (other than PBBs, PBDEs and HBCDD) in consumer products. Mains power supply cord sets are exempted and only declarable in BOMcheck, just like medical devices and lighting products.	
Brominated Flame Retardants and PVC <u>restricted</u> in consumer products	6 and 7	1000	Additional restriction of PVC and Brominated Flame Retardants (other than PBBs, PBDEs and HBCDD) in any plastics parts. Mains power supply cord sets are exempted and only declarable in BOMcheck, just like medical devices and lighting products.	

1.2 Scope

The requirements as set up in the Philips Lighting Regulated Substances List are a global policy of Philips Lighting, even if local regulatory requirement may be less strict. Where there is a difference between the Philips Lighting requirements and the local regulatory requirements, the most stringent, i.e., the most protective for health, safety and the environment applies.

The scope of this document includes all articles (i.e. materials, components, subassemblies, products, labels attached to products, etc., further mentioned as Products in the RSL), product packaging (i.e. wood, paper or card-boxes, plastic material, containers, user manuals, labels, etc., further mentioned as Packaging in the RSL) and some manufacturing processes as described in Table 8.

The requirements as listed in the RSL are mandatory to all products, parts and packaging materials used

- to produce Philips branded products,
- to produce products under a Philips Brand License Agreement and
- to produce products of other brands that are owned by Philips Lighting.

This includes all consumables, accessories and non-Philips branded products that are by-packed or integrated in our products, and of which the original brand name of the OEM is still visible for the customer. A dispensation has to be applied in case the OEM requests to waive certain policy requirements.

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For non-Philips branded products that are placed on the market by Philips Lighting (e.g. as a distributor) it is recommended to also use the RSL as baseline requirements document. At least all substance legislation applicable in the country where the product is placed on the market have to be complied with.

These requirements are for products and packaging placed on the global market.

The restricted substances cannot be contained in the product or used in the manufacture of the product and its components above the designated thresholds for the controlled applications listed. Declarable substances that are used in articles or packaging materials must be declared according to the limits given in the respective table.

If the supplier needs clarification with respect to Philips Lighting' guidelines and rules presented here, they should discuss with the Philips Lighting Representative, which is generally the supplier account manager. If a brand licensee needs clarification, they should discuss with Philips Lighting representative for sustainability in the Brand Committee.

1.3 Deviations

In those cases where the supplier supplies or intends to supply articles to that do not comply with the Philips Lighting RSL, the supplier needs to contact the Philips Lighting Supply Management organization immediately to resolve the issue and to decide through mutual agreement on corrective actions. When a brand license partner intends to bring brand license product to the market that does not comply with the Philips Lighting RSL, licensee needs to contact the Philips Lighting representative for sustainability in the Brand Committee.

Recycled content

Philips Lighting strongly promotes the use of recycled materials, in particular the use of recycled plastics. Philips Lighting realizes that the use of recycled materials may cause challenges in terms of guaranteeing compliance to all substances included in the Philips Lighting RSL. For issues related to Philips Lighting RSL compliance for recycled materials, please contact Philips Lighting Supply Management for support. For non-legal obligations, it may be possible to obtain a waiver for the presence of certain substances in recycled materials.

1.4 Thresholds

Maximum concentration limit for restricted substances

Philips Lighting BV accepts that some certain materials contain a certain amount of naturally occurring restricted substances. However, when a substance is present in products, parts or product packaging at values above the listed maximum concentration limit, the substance is restricted to the maximum concentration limit. Thresholds can represent legal limits or refer to currently accepted analysis thresholds. Restricted substances (e.g. RoHS) are measured at homogeneous level (unless otherwise stated), so these thresholds must be declared on homogeneous material level (See also Annex 1). Use of substances exempt for use in some specific applications, as mentioned in legislation, is allowed, but needs to be declared.

Maximum concentration limit for declarable substances

Declarable substances (e.g., REACH SVHCs) are substances the use of which use needs to be monitored due to a regulatory requirement or because Philips Lighting wants to monitor use from a precautionary point of view. Use of these substances is permitted, unless otherwise specified, but must be reported when above the maximum concentration limit. In this case the maximum concentration limit functions as a threshold above which you must provide the exact concentration of the declarable substance present in the relevant part, article or packaging. A basic understanding and interpretations of definitions like homogeneous material and REACH article definition are presented in Annex 1.

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2 SUPPLIER DECLARATION PROCESS

2.1 Declaration Tool

As referred to in Section 1.1, Philips Lighting will collect substances information for its parts, products and product packaging because regulations such as RoHS and REACH require us to maintain regulatory compliance evidence at that level. Philips Lighting has decided to utilize BOMcheck as a tool to help collect chemical substances information from suppliers (www.bomcheck.net). BOMcheck is an industry platform used by a large number of companies and represents an efficient tool that helps suppliers follow up on the many legal requirements and provides smooth communication with the customers and in particular with suppliers up the supply chain. BOMcheck is primarily a regulatory compliance tool designed specifically to enable suppliers to provide declarations for RoHS, REACH, and any other restricted and declarable substances legislation through detailed substances reports. BOMcheck also allows suppliers to provide Full Material Declaration (FMD) of their articles. The benefit of FMD is that suppliers have to upload the total chemical composition of their articles only once (unless the formulation of supplied articles changes), while BOMcheck will then automatically update your company's compliance status every time regulatory changes are introduced. Philips Lighting recommends the brand license partners to follow the same way of working.

BOMcheck complies with FDA requirements in Title 21 CFR Part 11 and Title 21 CFR 820.70(i).

2.2 Demonstrating compliance to the RSL through BOMcheck

Suppliers are requested to make declarations in BOMcheck for all articles (i.e. materials, components, subassemblies, products, labels attached to products, etc.), packaging materials (i.e., wood, paper or card-boxes, plastic material, containers, user manuals, labels, etc.) and some manufacturing processes. We request suppliers to regularly check for possible updates of the RSL to remain informed of the latest changes in all legislative and policy obligations at http://www.lighting.philips.com/main/company/about/sustainability/product-compliance.html

The BOMcheck substances list which also includes REACH SVHC's and RoHS exemptions can be found at the following link: https://www.bomcheck.net/suppliers/restricted-and-declarable-substances-list

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3 PRODUCTS CONTENT RESTRICTIONS AND DECLARATIONS

TABLE 1: RoHS Substances Restrictions in products

Restrictions are derived from EU RoHS Directive. Similar legislation is increasingly adopted in other regions and for other non-EEE applications (e.g. in EU REACH). The restrictions in this Table apply to all Philips Lighting products on homogeneous material level in all regions.

Substances (remark 1)	Maximum Concentration Limit ppm (mg/kg)
Cadmium and Cadmium compounds	100
Hexavalent Chromium compounds	1000
Lead and Lead compounds	1000
Mercury and Mercury compounds (remark 2)	1000
Polybrominated diphenyl ethers (PBDEs) (remark 3)	1000
Polybrominated biphenyls (PBBs) (remark 3)	1000

- The restrictions do not apply to the exemption limits in the <u>European Directive RoHS (2011/65/EU)</u>, and exemption limits in other RoHS type of regulations like the <u>Canadian CEPA-SOR/2014254</u>. They also do not apply to batteries- and automotive applications as these are covered by other legislation (see e.g. EU battery directive (<u>2006/66/EU</u>; see also Table 4), the European ELV directive (<u>2000/53/EC</u> and the amendment <u>2011/37/EU</u>). The list of EU RoHS exemptions, EU battery directives and EU ELV directive can be found in <u>BOMcheck</u>. Heavy metal restrictions for batteries and packaging are given in Tables 4 and 7, respectively.
- 2. Besides the RoHS obligations, Lighting Products should also comply with the UN Minamata Convention and the Ecodesign /ERP directive 2009/125/EC (Implementing measure EC No 245/2009), therefore, a declaration via BOMcheck is required including: (1) providing the average amount of Mercury per lamp in x,x mg; and (2) indicating the relevant ROHS exemption number within the section on RoHS in BOMcheck tool.
- 3. Polybrominated diphenylethers (PBDE) are the same as polybrominated biphenylethers (PBBE); polybrominated diphenyloxides (PBDO) are the same as polybrominated biphenyl oxides (PBBO).

TABLE 1.1 Upcoming EU RoHS Restrictions in products

Phthalates, DEHP, BBP, DBP and DiBP are part of EU RoHS in July 2019 (medical devices, category 8 in July 2021). To prepare for product compliance, the 4 phthalates are declarable substances as of 2015. The declaration threshold, 1000 ppm, applies to all Philips Lighting products on homogeneous material level in all regions.

Substances	Maximum Concentration Limit ppm (mg/kg)
Bis (2-ethylhexyl)phthalate; Di (2-ethylhexyl) phthalate (DEHP), CAS 117-81-7	1000
Dibutyl phthalate; Di-n-butyl phthalate (DBP), CAS 84-74-2	1000
Benzyl butyl phthalate; Butyl benzyl phthalate (BBP), CAS 85-68-7	1000
Diisobutyl phthalate; Di-i-butyl phthalate (DiBP), CAS 84-69-5	1000

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TABLE 2: REACH Article 67 Substance Restrictions in products and packaging

These substances are equivalent to the relevant restrictions as included in article 67 of the EU REACH regulation.

Unless otherwise stated the limits are on homogeneous material level. Philips Lighting enforces the limits worldwide.

Substances	Maximum Concentration Limit ppm (mg/kg) or as given in the table	Particular use and further remarks			
Restrictions for electrical and mechanica	Restrictions for electrical and mechanical products in all applications				
Asbestos (all types)	No intentionally added content				
Dibutyltin (DBT) compounds	1000	0.1% by weight of tin in a material, used as heat stabilizer			
Dimethylfumarate (DMF)	0.1	Used as pesticides and biocides, e.g. in silica gel bags in packaging.			
Tri-substituted organostannic compounds	1000	0.1% by weight of tin in a material, used as pesticides and biocides			
Tar oils and creosotes	No content permitted	In wood or wooden material as preservative			
Monomethyl dibromodiphenyl methane (DBBT)	No additionally added content				
Monomethyl dichlorodiphenyl methane (Ugilec 121 or Ugilec 21)	No additionally added content	Used as dielectrics			
Monomethyl tetrachlorodiphenyl methane (Ugilec 141)	No additionally added content				
Polychlorinated terphenyls (PCTs)	No additionally added content				
1,2,4-Trichlorobenzene	1000	Used as dielectrics, in any substance or preparation			
Perfluorooctanoic acid (PFOA) and its salts	0.025	Currently restricted in Norway (1000 ppm in all applications or for textiles 1 ug/cm2). All applications except medical devices, from 4 July 2020 restricted above 0.025 ppm by REACH; The RSL/BOMCheck limit before 2018 was not intentionally added/1000 ppm);); This 1000 ppm limit will be the limit for medical devices until 2032. PFOA, for example, is used as surfactant in manufacture of some fluoropolymers and fluoroelastomers.			

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Substances	Maximum Concentration Limit ppm (mg/kg) or as given in the table	Particular use and further remarks			
Additional restrictions which apply to parts used in toys and childcare products					
Sum of selected Phthalates Group 1 (BBP, DBP, DEHP)	1000	In plasticized material			
Sum of selected Phthalates Group 2 (DIDP, DINP, DNOP)	1000	In plasticized material when used in toys and childcare articles which can be placed in the mouth			
Benzene	5	Toys			
Dioctyltin (DOT) compounds	1000	0.1% by weight of tin in a material			
Any individual PAH compound (see list under remark 5)	0.5	Plastic or rubber material coming to repetitive skin or oral cavity contact in toys and childcare articles, in force for products placed on market after 27 th December 2015 See Table 6 for additional requirements on PAH			
Additional restrictions which apply to pa	rts that contain leather an	nd textiles			
Dioctyltin (DOT) compounds	1000	0.1% by weight of tin in a material			
Azocolourants and azodyes which form certain aromatic amines	30	Not permitted in textile and leather articles			
Tris-(1-aziridinyl) phosphinoxide	No content permitted	Not permitted in textile articles			
Tri-(2,3-dibromo-propyl) phosphate	No content permitted	Not permitted in textile articles			
Additional restrictions which apply to pa	rts that come in contact w	rith skin			
Nickel and nickel alloys (see remark 4)	0.5μg/cm²/week				
Any individual PAH compound (see list under remark 5)	1	Plastic or rubber material coming to repetitive skin or oral cavity contact in consumer articles, In force for products placed on market after 27 th December 2015 See Table 6 for additional requirements on PAH			
Additional restrictions which apply to parts which contain chemical products (liquids, gases, powders; as substance or preparation)					
Nonylphenol and nonylphenol ethoxylates compounds	1000	For example, use in textile processing			
Benzene Pentachlorophenol (PCP)	1000 1000	For example, use in cleaners For example, use in leather, wood and paper			

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- 4. ECHA guidance on defining "direct and prolonged skin contact can be found at: http://echa.europa.eu/documents/10162/13641/nickel restriction prolonged contact skin en.pdf Does not apply to Medical devices and associated equipment. Medical device safety standards require biocompatibility testing to ensure that chemical substances, which may contact patients during use per the device's intended use, do not pose a health risk, specifically with respect to biocompatibility.
- 5. The PAH compounds restricted are: Benzo[a]pyrene CAS 50-32-8, Benzo[e]pyrene CAS 192-97-2, Benzo[a]anthracene CAS 56-55-3, Chrysene CAS 218-01-9, Benzo[b]fluoranthene CAS 205-99-2, Benzo[j]fluoranthene, CAS 205-82-3

 Benzo[k]fluoranthene CAS 207-08-9 and Dibenzo[a,h]anthracene CAS 53-70-3. See also ECHA's PAH guidance: https://echa.europa.eu/documents/10162/106086/guideline_entry_50_pahs_en.docx/f12ac8e7-51b3-5cd3-b3a4-57bfc2405d04.

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TABLE 3: Substances restricted or declarable by other legislation in products and packaging.

Unless otherwise stated, the limits are on homogeneous material level. Philips Lighting enforces the limits worldwide.

Substances	Maximum concentration limit ppm (mg/kg) or as given in the Table	Particular use / Legislation
Restrictions for electrical and mechanical prod	ucts in all application	ns
Formaldehyde	No intentionally added content	In composite wood products or components (plywood, particle board and MDF) and textiles (see remark 6); U.S. EPA TSCA Title VI/California ATCM.
Lead and lead compounds	300	Applied in outer sleeves of cables/cords with thermoset or thermoplastic coatings, according to Proposition 65 legislation, California
Polychlorinated and polybrominated dioxins and furans	No intentionally added content	EU POP regulation.
Radioactive substances	No intentionally added content	Japan Law Concerning Prevention from Radiation Hazards; EU-D 96/29/Euratom.
Pentachlorophenol (PCP)	No intentionally added content	EU Biocidal Product Regulation; applied in wood and furniture (5 ppm, Germany and Switzerland); Applied in all products (Denmark, no limit); For textiles in Korea 0.05 ppm for children textile/leather, 0.5 ppm for adult's textile/leather.
Biocides	No intentionally added biocide	EU Biocidal Product Regulation; Medical devices are exempted.
Perfluorooctane sulfonate (PFOS) compounds	1000	1000 ppm in all articles and semi-finished products, in textiles1 μg/m2 of the coated material; EU POP legislation
Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene (BNST)	No intentionally added content	e.g., as lubricant; Canada regulation.
Phthalates DiDP, DnHP, DiNP (see remark 7)	No intentionally added content	Proposition 65 legislation, California;
Phthalates DEHP, BBP, DBP, DIDP and DNHP (see remark 7)	100	Applied in outer sleeves of cables/cords of headphones and headsets; based on Proposition 65 legislation, California; for example, used as plasticizer

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Substances	Maximum concentration limit ppm (mg/kg) or as given in the Table	Particular use / Legislation	
Phthalates DEHP, BBP and DBP (see remark 7)	1000	Applied for bags, pouches, mobile phone and other portable electronics replaceable covers or cases; based on Proposition 65 legislation, California; for example, used as plasticizer	
Hexabromocyclododecane (HBCDD) and its main diastereoisomers	100	EU POP regulation 2016/293 on persistent organic pollutants; use as flame retardant	
Alkanes, C10-13, chloro (SCCP; Short chained chlorinated paraffins)	No intentionally added content	Applied as plasticizers and flame-retardants; Legislation in The Netherlands: no intentionally added content; Please note, Restricted by EU POP regulation 2015/2030 on persistent organic pollutants when applied in articles in concentrations higher than 0,15 % by weight.	
Polychloronaphtalenes	No intentionally added content	With one or more chloro atoms; applied as stabilizer and flame retardant in plastics; UN Stockholm Convention on POPs, Swiss, Canada and Japan legislation	
Polychlorinated biphenyls (PCBs)	No intentionally added content	EU POP regulation; use as plasticizers, flame retardants and dielectrics	
Additional Restrictions which apply to parts us	ed in toys and childc	are products	
Tris(2-chloroethyl)phosphate (TCEP; CAS 115-96-8)			
Tris(2-chloro-1-methylethyl) phosphate (TCPP; CAS 13674-84-5)	No content permitted	(see remark 7 for legislation)	
Tris(1,3-dichloro-2-propyl)phosphate (TDCPP/TDCP; CAS 13674-87-8)			
Lead and lead compounds	100	Applied in accessible parts in toys and childcare products; US Consumer Product Safety Improvement Act	
Lead and lead compounds	90	Applied in paint and similar coatings; US Consumer Product Safety Improvement Act	
Additional restrictions which apply to parts wh	nich come in contact	with food	
BPA (Bisphenol A)	No content permitted	In all food contact materials in consumer products (see remark 8); French legislation	

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Substances	Maximum concentration limit ppm (mg/kg) or as given in the Table	Particular use / Legislation
Additional requirements which apply to parts	used in medical devic	ces
BPA (Bisphenol A)	Declare	Declare if manufactured from raw materials using BPA or derived of BPA and if used in medical devices and part comes in contact with patient or patient fluids (e.g., via intravenous, inhalation, oral exposure, contact with skin, or as an implant). Canadian legislation
Phthalates (remark 7)	Declare	for parts of a device (or a device itself) intended to administer and/or remove medicines, body liquids or other substances to or from the body, or devices intended for transport and storage of such body fluids or substances; EU Medical Device Directive
Latex	No intentionally added content	The United States FDA requires all medical devices and its packaging which contain natural rubber (Latex) or dry natural rubber that can contact human skin to be marked per FDA User Labeling for Devices that Contain Natural Rubber (21 CFR 801.437)
Additional restrictions which apply to parts whor preparation)	nich contain chemica	I products (liquids, gases, powders; as substance
Ozone depleting substances	No intentionally added content	All applications; Montreal protocol and EU Regulation No 2037/2000
Alkanes, C10-13, chloro (SCCP; Short chained chlorinated paraffins)	10000	Restricted by EU POP regulation 2015/2030 on persistent organic pollutants when applied in preparations in concentrations higher than 1 % by weight
Fluorinated Greenhouse gases (PFC, SF6, HFC)	Specific permission needed	EU regulation 517/2014

- 6. Composite wood finished goods must be labeled showing compliance either with U.S. EPA TSCA Title VI regulation or the California Air Resources Board (CARB) Airborne Toxic Control Measures (ATCM) Phase II emission standards. Formaldehyde emission from materials: Emission from hardwood plywood (HWPW) veneer core is 0.05 ppm after 1-Jan-2010. HWPW composite core emission limit is 0.05 ppm from 1-July-2012. Emission limit from particle board (PB) is 0.09 ppm from 1-Jan-2011. Emission limit from medium density fibreboard (MDF)) is 0.11 ppm from 1-Jan-2011. Emission limit from thin medium density fibreboard (MDF)) is 0.13 ppm from 1-Jan-2012. Composite wood is defined by California Code of Regulations (CCR), Title 17, Section 93120.1. Refer to CCR, Title 17, Section 93120.9 for test methods.
- 7. TRIS flame retardants are regulated for childcare articles and children's products in Canada, EU toy directive 2009/48/EC and by US states New York, Maryland, Vermont. US District of Columbia restricts TCEP and TDCPP in consumer products for children under 12 years of age from 2018 onwards and in all consumer products from 2019 onwards. See the BOMcheck online guidance for more details on legislation.
- 8. For Philips Lighting consumer products, a policy banning BPA applies to all food contact materials in appliances introduced to market since 1st January 2012;

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TABLE 4: Substance Legislative Restrictions in Batteries

The limits are on battery level. Philips Lighting enforces the limits worldwide.

Substances	Maximum concentration limit ppm (mg/kg)	Remarks/Legislation
Cadmium and cadmium compounds (see remark 9)	10	EU battery directive
Mercury and mercury compounds	1	Chinese Standard GB 24427-2009
Lead and lead compounds (see remark 9 and 10)	40	Chinese Standard GB 24427-2009
Perchlorates in all batteries	0.006	Labelling requirement in Californian regulation

- Cadmium use is exempted for batteries used in emergency lighting (see European Battery <u>directive (2006/66/EU; and for some spare parts for electric vehicles (2000/53/EC</u> and the amendment <u>2011/37/EU</u>). Additionally, cadmium and lead compounds use is exempted for batteries in some automotive applications (see European ELV directive (<u>2000/53/EC</u> and the amendment <u>2011/37/EU</u>)
- 10. The lowest restriction limit for non-alkaline zinc-manganese dioxide batteries is 1000 ppm from Conama 257/99 (Brazil) and from Swiss legislation. The IEC 62474 database includes a restriction on Lead and Lead compounds in all types of batteries of 0.004% (40 ppm) by weight of battery based on Chinese Standard GB 24427-2009 (Alkaline zinc manganese dioxide batteries) and the EU battery directive.

TABLE 5.1: REACH Candidate List Substances Declaration used in all product and product-packaging related applications (Article 33)

The limits are on REACH article level. Philips Lighting enforces the limits worldwide.

Due to the fact that the European Chemicals Agency updates this list at least twice a year, we refer to the http://echa.europa.eu/chem_data/candidate_list_table_en.asp for the most recent list of candidate substances. BOMcheck will also contain the most recent list of SVHC and separates between those SVHC which are likely to be found in electronics and those that are not. Please see the lists for substances likely to be present in product and packaging applications in the following link: <u>Link to BOMcheck</u>.

The use of an SVHC is allowed (unless otherwise stated in any of the other Tables in the RSL). However, when the concentration on the article level is found to be above the limits stated here, declaration is obligatory. For definitions, such as "Article", please see the Annex 1.

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TABLE 5-2: California proposition 65 substances used in all product and product-packaging related applications, which are not included in any other Table in the RSL.

The limits are on homogeneous material level. Philips enforces the limits worldwide.

Prop 65 requires companies doing business in California to provide a "clear and reasonable" warning via product labeling before knowingly and intentionally exposing anyone to a Prop 65 Listed Chemical, unless the manufacturer can show that the anticipated exposure level will not pose a significant risk of cancer or is significantly below levels observed to cause birth defects or other reproductive harm. Safe Harbor Levels exist for some Listed Chemicals and include No Significant Risk Levels (NSRLs) for cancer-causing chemicals and Maximum Allowable Dose Levels (MADLs) for chemicals causing reproductive toxicity. These levels are measured in $\mu g/day$ and must take into account all exposure routes (e.g. inhalation, oral, dermal). When the product exposes individuals to chemicals above the Safe Harbor Level, a clear and reasonable warning must be provided by the manufacturer. When no Safe Harbor Level is available, and the product contains a Prop 65 Listed Chemical, a manufacturer also would be required to provide a Proposition 65 warning, unless the manufacturer can show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

Due to th fact that OEHHA updates the Prop65 list regularly, we refer to the list in BOMcheck. BOMCheck will only show those substances which are likely to be found in hardware products and electrical and electronic equipment and are not listed elsewhere in BOMCheck. Please see this list in the following link: <u>Link to BOMcheck</u>.

TABLE 6: Industry Specific Substances Restrictions and Declarations in products and packaging.

Unless otherwise stated the limits are on homogeneous material level. Philips Lighting enforces the limits worldwide. These restrictions and declarations go beyond legislation and are included due to upcoming legislation and customer requirements.

Substances	Restricted or declarable	Maximum Concentration or declaration Limit ppm (mg/kg)
Restrictions for electrical and mechanical products in all applications		
Beryllium and Beryllium oxide (see remark 11)	Restricted	1000
Brominated Flame Retardants in printed wiring board laminate (other		
than PBBs, PBDEs and HBCDD); restriction/declaration threshold for	Restricted in	900
total bromine concentration by weight in homogeneous material	consumer	
used in printed wiring laminates (see remark 12)	products,	
Brominated Flame Retardants (other than PBBs, PBDEs and HBCDD) in	declarable in	
any plastics parts; restriction/declaration threshold for total bromine	professional	1000
concentration by weight in homogeneous material used in plastics	Lighting products	
(see remark 12)	and Medical	
Polyvinyl Chloride (PVC) and vinyl chloride copolymers in total	devices (see	
chloride concentration by weight in homogeneous material (see	remarks 13 and 14)	1000
remark 13)		

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Chlorinated Flame Retardants in printed wiring board laminate; declaration threshold for total chlorine concentration by weight in	Declarable	900
homogeneous material used in plastics		
Chlorinated Flame Retardants in any plastics parts; declaration	Declarable	1000
threshold for total chlorine concentration by weight in homogeneous material used in printed wiring laminates		
Antimony trioxide in plastic materials;	Declarable	1000
Phthalates (see remark 14)	Declarable	1000
Additional restrictions which apply to parts used in lamps and lamp ba	allasts	
Antimony compounds in glass of lamp bulbs	Restricted	1000
Arsenic compounds in glass of lamp bulbs	Restricted	1000
PAH (Polycyclic aromatic hydrocarbons) in potting material for electronic ballast of lamps	Restricted	50
Additional restrictions which apply to parts which come in contact wit		
Azocolourants and azodyes which form certain aromatic amines (see remark 15)	Restricted	30
PAH compounds (German product safety requirement for consumer	Restricted	See Annex III for limit
products)		values
Additional restrictions which apply to parts that contain leather and to		
Alkylphenol and alkylphenol ethoxylates (see remark 16)	Restricted	100

- 11. Beryllium and Beryllium oxide are exempted in the following applications, when no feasible technological alternative exist:
 i) Be metal and BeO used in X-Ray applications, ii) BeO as ceramic heat-resistant in semiconductors, iii) Be metal alloy (e.g., BeCu), and iv) BeO used in high power RF resistors.
- 12. Philips Lighting is pursuing a phase out of the use of BFRs in consumer products newly put on the market. Mains power supply cord sets are exempt from this policy. The use of BFRs needs to be declared to Philips Lighting via the BOMcheck tool. For Philips Lighting consumer products organobromine compounds in the form of flame retardants should not be used in parts, components, materials, or products in concentrations equal to or greater than 0.09% (900 ppm maximum of Bromine) by weight in any homogeneous material. BFRs are declarable for professional Lighting products and Medical Devices and mains power supply cord sets.
- 13. Philips Lighting is pursuing a phase out of the use of PVC, in consumer products newly put on the market. Therefore, the use of PVC needs to be declared to Philips Lighting via the BOMcheck tool. For Philips Lighting consumer products organochlorine compounds in the form of polyvinyl chloride or PVC copolymers should not be used in parts, components, materials, or products in concentrations equal to or greater than 0.1% (1000 ppm maximum of Chlorine) by weight in any homogeneous material. Mains power supply cord sets are exempt from this PVC phase out. PVC is declarable for professional Lighting products, Medical devices and mains power supply cord sets.
- 14. E.g. phthalates used in parts of a device (or a device itself) intended to administer and/or remove medicines, body liquids or other substances to or from the body, or in devices intended for transport and storage of such body fluids or substances; EU Medical Device Directive; See further in Annex II for all legal requirements for phthalates.
- 15. This restriction of Azo dyes goes beyond the legal restriction under REACH article 67 (see Table 2) as Philips Lighting restricts the use of Azo dyes in all applications that come in contact with the skin, and not only for textiles and leather. Also, two additional aromatic amines are restricted in Philips Lighting compared to the 22 aromatic amines restricted under REACH Article 67, based on regulation in Japan, Thailand and China. These 2 additional Azo dyes are: 2,6-xylidine (CAS: 87-62-7) and 2,4-xylidine (CAS: 95-68-1).
- 16. Increasing number of alkyl phenols and their ethoxylates are becoming regulated under legislation, e.g. EU Reach restriction in 2021 for textiles and leather (100 ppm). In view of the increasing concern and attention focused on these alkylphenols and their ethoxylates, a precautionary approach is taken to restrict the allowable concentration of these substances in parts to < 0.01% w/w. Examples of such alkylphenols, including their ethoxylates are octylphenol and nonylphenol.

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TABLE 7: Additional restrictions in Product-Packaging *unless otherwise stated the limits are on homogeneous material level. Philips Lighting enforces the limits worldwide.*

Legislative Substances	Maximum concentration limit ppm (mg/kg)	Remarks
Sum of Heavy metals (Cd, Hg, Cr(6+) and Pb)	100	EU packaging directive
Dimethyl fumarate (e.g. in silica gel bags)	0.1	REACH article 67
Arsenic compounds, applied for wood packaging	No intentionally added content	REACH Article 67, bans the use of arsenic compounds for the preservation of wood
Formaldehyde content in packaging (see remark 6)	1000	California and German legislation
Industry substances		
Polyvinyl chloride (PVC) and PVC copolymers	1000	
Expanded polystyrene (EPS) and other polymeric foam materials inside any consumer product packaging	Not permitted	For example, EPP, EPE, EVA as shock absorber buffers enclosing the product, excluding thin foam sheets and foam bags.

TABLE 8: Substances restricted in Manufacturing Processes

Substances	Maximum concentration limit ppm (mg/kg)	Application
Hexavalent Chromium (Cr 6+) and compounds (see remark 17)	Not permitted	Not permitted in passivation processes
Ozone Depleting Substances (see remark 18)	Not permitted	Not permitted in any manufacturing processes

- 17. Due to the difficulties to control the plating Cr6+ process, posing compliance risks of products (e.g. RoHS) brought to the market by Philips Lighting; this substance must not be used in any passivation process. Passivation process here means the process where metal surface is getting hexavalent chromium conversion coating, leaving hexavalent chromium residues on the processed surface.
- 18. Use of Ozone Depleting Substances in processes is subject of federal excise tax law applied to all imported electronics in USA. The substances are also internationally banned under UNEP Montreal Protocol on Substances that Deplete the Ozone Layer and incorporated in the REACH Regulation under article 67.

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ANNEX 1 - Definitions and interpretation of certain terms

1.1. Declaration on homogeneous material level (EU RoHS directive)

A homogenous material is a single substance such as a thermoplastic, for example the PVC insulation on insulated copper wire. Components such as capacitors, transistors and semiconductor packages are not regarded as "materials" but instead contain several different homogenous materials. For example, a semiconductor package will contain at least six homogenous materials as shown In Figure 1. The RoHS materials restrictions apply to each of these individual homogenous materials.

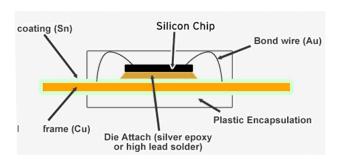


Figure 1: Material breakdown of an Integrated Circuit (IC) component

Substance 'X' < 0.1% at Homogeneous Material level means:

- Plastic encapsulation → X < 0.1%
- Bond wire \rightarrow X < 0.1%
- Silicon ship \rightarrow X < 0.1%
- "Lead Frame" coating (Cu) → X < 0.1%
- "Lead Frame" coating (Sn) → X < 0.1%
- Die Attach \rightarrow X < 0.1%
- Etc.

1.2. Article Definition (EU REACH regulation)

An article means an object, which during production is given a special shape, surface or design, which determines its function to a greater degree than does its chemical composition. The European Court of Justice ruled on 10th September 2015, on EU REACH Regulation article definition, that each of the articles, that are assembled or joined together in a complex product, remain as articles and are covered by the relevant duties to notify and provide information when they contain a Substance of Very High Concern in a concentration above 0.1% of their mass.

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ANNEX 2 - Summary Table of Phthalate Restrictions

Chemical Name	Abbrevia tion	CAS No.	EU RoHS restricted from 2019	Restriction REACH, CSPIA (1,2)	Restriction Proposition 65 (3,4)	Declaration as industry substance	MDD (6) labelin g	REACH declarable
	tion		RSL Table 1.1	RSL Table 2	RSL Table 3	RSL Table 6	RSL Table 3	RSL Table 5
Bis (2-ethylhexyl)phthalate; Di (2-ethylhexyl) phthalate	DEHP	117-81-7	х	Х	x (3,4)	х	х	x (7)
Dibutyl phthalate; Di-n-butyl phthalate	DBP	84-74-2	х	Х	x (3,4)	х	х	x (7)
Benzyl butyl phthalate; Butyl benzyl phthalate	ВВР	85-68-7	x	Х	x (3,4)	х	х	x (7)
Diisobutyl phthalate; Di-i-butyl phthalate	DIBP	84-69-5	x			х	x	x (7)
Di-isononyl phthalate; Diisononyl phthalate	DINP	28553-12-0; 68515-48-0		x	x (5)	x		
Di-isodecyl phthalate; Diisodecyl phthalate	DIDP	26761-40-0; 68515-49-1		х	x (3,5)	x		
Di-n-octyl phthalate	DNOP	117-84-0		Х		х		
Di-n-hexyl phthalate	DNHP	84-75-3			x (3,5)	х		х
1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters	DIHP	71888-89-6				х		х
1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear	DHNUP	68515-42-4				х		х
Bis(2-methoxyethyl) phthalate	DMEP	117-82-8				х	х	х
N-pentyl-isopentylphthalate	-	776297-69-9				х		х
1,2-Benzenedicarboxylic acid, dipentylester, branched and linear		84777-06-0				х		х
Di-n-pentyl phthalate	DPP	131-18-0				х	х	х
Diisopentylphthalate	-	605-50-5				х	х	х
1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear	-	68515-50-4				х		х
1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters; 1,2- benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters with ≥ 0.3% of dihexyl phthalate		68515-51-5 or 68648-93-1				x		х
Dicyclohexyl phthalate		84-61-7				х	х	
1,2-benzenedicarboxylic acid, dipentylester, branched and linear		84777-06-0				х	х	х

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- 1) REACH Restriction under article 67: Restriction applies to the sum of the phthalates (the sum of DEHP, DBP, BBP) and (the sum of DINP, DIDP, DNOP).
- 2) Same substances also restricted in CSPIA, USA: section 108 (see: https://www.cpsc.gov/Regulations-Laws-Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act/Phthalates/Phthalates-Information/)
- 3) Proposition 65 Legislation in California, USA: Applied in outer sleeves of cables/cords of headphones and headsets
- 4) Proposition 65 Legislation in California, USA: Applied for bags, pouches, mobile phone and other portable electronics replaceable covers or cases
- 5) Proposition 65 Legislation in California, USA; all applications.
- 6) MDD: Medical Devices Directive
- 7) REACH authorization per 21-02-2015

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ANNEX 3 – Detailed Requirements for Consumer Product Skin Contact Parts for PAH Compounds in Germany

The German GS-Mark on product safety ("Geprüfte Sicherheit") has revised their PAH-limits for consumer products.

Three different product categories have been defined:

- 1. Material is used in a toy and comes to intended prolonged skin contact or product material is intended to be placed in the mouth
- 2. During the intended use of the product, material is in prolonged skin contact or in repeated short-term skin contact
- 3. During the intended use of the product, material is only in short term skin contact.

For each category, material needs to fill not only the total maximum allowable sum for all 18 PAHs, but also the individual PAH substance limits described in the table below.

In Table 2 of this RSL you will find the EU REACH restrictions on PAH. The REACH-restricted PAH-compounds have been marked in the table below.

Substance	CAS	1) Materials intended to be placed in the mouth and toy materials with intended prolonged skin contact (>30 sec.). [mg/kg]	with foreseeable prolonged skin contact (>30 sec.) or	3) Materials which do not fall under Cat. 1 and 2, with foreseeable short term skin contact (<30 sec.). [mg/kg]	EU REACH restricted PAH (x)
Benzo[a]pyrene (BaP)	50-32-8	<0.2	<0.5	<1	х
Benzo[a]anthracene	56-55-3	<0.2	<0.5	<1	x
Chrysene	218-01-9	<0.2	<0.5	<1	х
Benzo[b]fluoranthene	205-99-2	<0.2	<0.5	<1	х
Benzo[k]fluoranthene	207-08-9	<0.2	<0.5	<1	х
Dibenzo[a,h]anthracene	53-70-3	<0.2	<0.5	<1	х
Benzo[j]fluoranthene	205-82-3	<0.2	<0.5	<1	х
Benzo[e]pyrene	192-97-2	<0.2	<0.5	<1	х
Indeno(1,2,3-c,d)pyrene	193-39-5	<0.2	<0.5	<1	
Benzo(g,h,i)perylene	191-24-2	<0.2	<0.5	<1	
Acenapthylene	208-96-8				
Acenaphthene	83-32-9				
Fluorene	86-73-7				
Phenanthrene	85-01-08	<1	<10	<50	
Anthracene	120-12-7				
Fluoranthene	206-44-0				
Pyrene	129-00-0				
Naphthaline	91-20-3	<1	<2	<10	
Sum of 18 PAH		<1	<10	<50	

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ANNEX 4 - Revision History

Date Revision	Short Explanation
May 14, 2018	 Version 12 California Proposition 65 legislation substances are added in Table 5.2 as declarable substances. The California Proposition 65 listed in previous RSL versions are removed from Table 3 and visible in Table 5.2 in version 12. Medical device exemptions are added for Biocides in Table 3 and PFOA in Table 2. Phthalates, when present in specific medical devices need labelling under the current EU MDD legislation are transferred from Table 3 to Table 6 to better align with BOMCheck Scope is adapted to have non-Philips Lighting branded and owned products when by-packed or integrated in Philips Lighting branded and owned products in scope of RSL. Table 0 only contains 2 instead of 4 differences between Philips RSL and BOMcheck. Tables 2, 3 and 6 are also valid for packaging now. Table 7 shows only the additional requirements for
	 packaging. Further alignment between BOMCheck and RSL took place in listing of substances per application. Skin contact and leather & textiles are listed under textiles & leather now.
Feb 28, 2018	RSL version 11. The restriction for Perfluorooctanoic acid (PFOA) and its salts is set from 1000 ppm for all applications and no additionally added content for textile and leather applications to 25 ppb due to upcoming EU REACH legislation per July 2020. The restrictions for Annual explanates containing containing perfusions is about a Annual explanates and conducts which
	 The restrictions for Azo colourants containing certain amines is changed to Azocolourants and azodyes which form certain aromatic amines (Table 2 and 6). The maximum concentration limit is changed from "No content permitted" to 30 mg/kg. Biocides are added to Table 3 to declare with threshold No intentionally added biocide content due to the EU Biocidal Product Regulation;
	 Following text is added to comment 8: US District of Columbia restricts TCEP and TDCPP in consumer products for children under 12 years of age from 2018 onwards and in all consumer products from 2019 onwards. It is noted here that businesses falling into this scope should take care of this additional requirement.
Sept 12, 2017	Version 9b & 10. Small editorial changes e.g. in header and footer
May 15, 2017	Version 8 and 9.
	 RSL version 8 is not published. RSL version 8 is aligned with BOMcheck 4.8, RSL version 9 with BOMcheck 4.9. Separate categories have been made within the Tables for leather and textiles, toys and childcare, chemical products, skin contact applications, medical devices, food contact applications, lamp and lamp ballasts. Scope of RSL slightly adapted on page 1 to have it mandatory for all Philips Lighting and Philips branded and licensed products only.
	 Fluorinated Greenhouse gases (PFC, SF6, HFC) added to Table 3 replacing the SF6 entry, due to EU regulation 517/2014. Will be active in BOMcheck version 4.9. 3 phthalates with CMR class 1b have been added to Annex 2, due to labelling requirements under the current MDD (Table 3).
	 2 azo dyes added to Table 6 additional to REACH due to requirements in Japan, Thailand and China Annex 3 on PAHs has been made clearer. Phenols in Table 6 changed into Alkylphenols and their ethoxylates in leather and textile applications (100 ppm, Table 6) due to upcoming legislation and customer demands. Will be active in BOMcheck version 4.9. PCP has been adjusted in Table 3 to no intentionally added content as threshold due to the EU biocide directive. PCP was also restricted due to various country legislations with a 5 ppm or even lower limit depending on the application. See Further in Table 3. Will be active in BOMcheck version 4.9. Mains power supply cordsets exempted for PVC/BFR restriction in Table 6.

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	Table O adopted to the above and traded to BOM 1. I
	Table 0 adapted to the changes not included in BOMcheck yet and format adapted Table 3 due to FDA lebelling requirements. Will be active in
	 Latex as declarable substance was added to Table 3 due to FDA labelling requirements. Will be active in BOMcheck version 4.9.
	References to legislations have been made clearer (e.g. lead in batteries, remark 11 adjusted). When no
	reference to legislation is made, the substance is restricted or declarable due to Philips Lighting policy.
	Scope and purpose section have been made clearer.
	 Phthalates DiDP, DnHP and DiNP have been added to Table 3 to align with BOMcheck and due to California proposition 65 requirements.
	 Exemption for BeO used in high power RF resistors added to industry restrictions for Be compounds in Table 6.
	 Threshold was changed from "no content permitted" to "no intentionally added content" for PCTs, DBBT,
	Ugilecs 21 or 121 and 141 in Table 2 to align with BOMcheck and other similar restrictions. Will be active in
	BOMcheck version 4.9.
	Perchlorate was added to Table 4 for batteries due to a labelling requirement in California legislation. This will
	be active in BOMcheck version 4.9.
April 2016	Version 7 – Philips Lighting version
	A separate Lighting RSL version has been created for Philips Lighting B.V. as an independent legal entity. The
	content follows the Royal Philips Regulated Substance List PHGR-GS-BP01-013 version 7, except minor textual
	changes.
	Table 3: Application text and threshold changed for Alkanes, C10-13, chloro (SCCP; Short chained chlorinated)
	paraffins) and Hexabromocyclododecane (HBCDD) and its main diastereoisomers due to EU POPs regulations
Januari 2016	2015/2030 and 2016/293. Minor text changes in Chapter 1.3 and 2.2
January 2016	Version 6 Self-to-date Table 0 to a self-to-table difference between BSL and Bossehool list of accordable and declarable. The self-to-date of the self-to-table difference between BSL and Bossehool list of accordable and declarable.
	Edited the Table 0 to reflect the differences between RSL and Bomcheck list of reportable and declarable substances.
	substances Table 2, the subheader "Substances which are liquids at room temperature" changed to "Restrictions"
	applicable to substances and preparations"
	Table 3, added restriction for hexabromocyclododecane, HBCDD
	Table 3, added restriction for Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-
	trimethylpentene, BNST
	Table 3, restrictions to the use of named phthalates (DEHP, BBP, DBP, DIDP and DNHP for cables in headsets
	and DEHP, BBP and DBP in bas, pouches and other accessories) from Table 6 to emphasize the obligatory
	restrictions
	 Table 3, included the term "food contact" in the subheader "Parts used in medical devices or in toys and childcare products" to correctly reflect the scope of BPA restriction
	Table 4, added a remark to the footnote for lead compounds "For zinc chloride zinc manganese batteries, the
	concentration limit 1000 ppm is applied"
	Table 7, foam use in packaging restriction scope clarified
	Table 8, Hexavalent chromium passivation term clarified
	Annex I, article definition changed due to EU Official Court ruling on 10 th September 2015
	• Annex II, included phthalate 1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters; 1,2-benzenedicarboxylic acid,
	mixed decyl and hexyl and octyl diesters with ≥ 0.3% of dihexyl phthalate (EC No. 201-559-5)
January 2015	Version 5
	Edited the Table 0 to reflect the differences between RSL and BOMcheck list of reportable and declarable
	substances
	Added new Table 1.1 describing the RoHS phthalates; now declarable and restricted from 2019 onwards
	Corrected Table 2 PAH restriction scope: any PAH compound instead of sum of PAH
	Table 2, added a footnote to official guidance on prolonged skin contact for nickel
	Table 2, benzene requirement clarified
	Table 3, formaldehyde requirement aligned with wording in BOMcheck The second of
	Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2- Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS flame retardants and tris(2- Table 3, revised the scope and limit values flame retardants and added new TRIS flame retardants and tris(2- Table 3, revised the scope and limit values flame retardants and added new TRIS flame retardants and tris(2- Table 3, revised the scope and limit values flame retardants and tris(3- Table 3, revised the scope and limit values flame retardants a
	chloro-1-methylethyl) phosphate (TCPP; CAS 13674-84-5
	Table 3, clarified the scope of lead in paint and similar coatings Table 3, added a featnest describing the Philips BRA policy.
	Table 3, added a footnote describing the Philips BPA policy

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	Table 4 lead compounds in batteries limit value undated.
	 Table 4, lead compounds in batteries limit value updated Table 6, replaced outdated PAH and Benzo(a) pyrene limits with reference to detailed requirement found in
	ANNEX 3
	Table 6, the scope of PVC restriction clarified; also, vinylchloride copolymers belong to the scope (previously
	mentioned in PVC footnote)
	Table 7, included other foam polymeric packaging materials into the scope of EPS ban
	Annex 2: Phthalate table updated
	Annex 3: Detailed requirements for PAH compounds for German GS mark added
February 2014	Version 4, GS-BP01-2014-001 (change to ISO conform version numbering, 4 th version RSL)
,	Added a remark on additional requirements which apply to special products into paragraph 1.1 Purpose
	Edited the Table 0 to reflect the differences between RSL and BOMcheck list of reportable and declarable
	substances
	Clarified the restriction for phthalates under REACH Article 67 restrictions, Table 2
	Added REACH Article 67 regulation for PAH compounds to Table 2 with footnote listing the restricted
	substances. Restriction will be in force from 27 th Dec 2015
	• Transferred the Californian Formaldehyde emissions requirement from Table 8 (Transport Emissions) to Table
	3
	Added the new restriction on PFOA originating from Norway to Table 3
	Added the restrictions on TCEP and TDCPP in toys and childcare, and in childrens' products originating from
	state-level legislation in USA to Table 3
	Corrected the restriction of PAH compounds limit for to be taken into the mouth or in contact with the skin of
	small children to Table 6 parts
	Added the list of PAH compounds with their CAS numbers as a footnote to Table 6
	Removal of Table 8 (Transport emissions), replaced by internal control document
	Added a summary of Phthalate requirements in the RSL to the Annex 2
February 2013	• Version C, CSO-BP01-2013-001
	Lead and lead compounds in primary alkaline zinc-manganese dioxide batteries to 40 ppm in line with China
	Standard: GB 24427-2009
	Lead and lead compounds in non-alkaline zinc-manganese dioxide batteries to 1000 ppm in line with Brazil Leading (CONAMA Baselution 404/2000)
	Legislation (CONAMA Resolution 401/2008)
	 Cadmium in batteries to 10 ppm in line with change in Swiss legislation (20 ppm) and Korean legislation (10 ppm)
	RSL further aligned with BOMcheck and legislation (addition of antimony trioxide in plastics to Table 6, SF6 to
	Table 3 (Austrian Legislation), thresholds for dimethylfumurate, organo stannic compounds and arsenic
	compounds in products and/or packaging
	Certain tin compounds (DBT and DOT) moved from table 6to Table 2 (REACH article 67)
	 Phthalates in some applications moved from Tables 2 and 3 to Table 6 and further specified which phthalates
	need to be declared if not asked elsewhere in the RSL.
	Ozone depleting substances and PFOS moved from Table 2 to Table 6,
	Phenols in Table 6 have been further specified.
	Philips policy on PVC and Bromine and Chlorine flame retardants has been slightly adapted in Table 6.
	Added Diisobutyl phthalate (DIBP) 84-69-5 in footnote 7 to align with the essential requirements of the EU
	Medical Devices Directive.
15.09.2011	Version B, CSO-BP01-2011-001
	Clarified in Section 1.1 where the RSL deviates from BOMcheck
	Changed Lead and lead compounds restriction limit from 300 to 100ppm in line with US legislation.
	Reorganised sequence of the Tables and a number of substances so it is the same sequence as BOMcheck
	(www.bomcheck.net)
	 paragraph explaining different thresholds moved from chapter 2.2 to chapter 1.4
	Added clarification that waivers may be obtained to stimulate use of recycled content in chapter 1.3
	added chapter 2.3 Demonstrating compliance through BOMcheck
	Revision in Chapter 3 moved completely to Annex II
	Adjusted the schedule for Medical devices' RoHS compliancy in Chapter 3, Table 1

Organization: Philips Document type: Policy Requirement Reference: QS-ExC4-004

Function: Lighting Sustainability Document owner: Leon Konings Process reference: < 17.4 >

Requirements for products Last modified: 2018-05-14 Page: 24 of 26



added hyperlink to Roh's recast in Official Journal of European Union and to BOMcheck with ELV and Roh's exemptions in Chapter 3, Table 1 adjusted table sub-header to "toys and childcare products" in Chapter 3, Table 2 Organostannic compounds restriction corrected to "tri-substituted organostannic compounds"in Chapter 3, Table 2 Dioctythin and Dibutythin compounds restriction added to Chapter 3, Table 6. Removed remarks from absectso, Ozone depleting substances, PrOS exemptions in Chapter 3, Table 2Added new legislation concerning the phthalates use, based on Proposition 65 of California, USA, to Chapter 3, Table 3 Added CAS-numbers and corrected faulty EC numbers for medical devices phthalates remark in Chapter 3, Table 3 Added CAS-numbers and corrected faulty EC numbers for medical devices phthalates remark in Chapter 3, Table 3 Formaldehyde, radioactive substances and lead advisory remarks removed in Chapter 3, Table 3 Added chapter and the substances and lead advisory remarks removed in Chapter 3, Table 3 Added word "declarations" to better describe the contents of Chapter 3, Table 6 contents Removed explanatory remark for PAH compounds in Chapter 4, Table 5 Arsenic compounds concentration limit changed from 10 ppm to "no content permitted" in Chapter 3, Table 6 Removed the substances table for REACH Candidate list substances and added a reference to BOMcheck as source of information for Chapter 3, Table 3 Old Table 9 contents moved to be part of Chapter 3, Table 3 Annex I on Roh's exemptions removed Version A, CSD-BPO1-2010-001 The Philips Regulated Substances list covers not only restricted, but also declarable substances and, therefore, replaces both the Restricted and Relevant Substances Lists in Products (CSO-BPO1-2006-11) and CSO-BPO1-2006-12). The Philips Regulated Substances substances list covers not only restricted, but also declarable substances and transport material and substances substances are growed out. Per Candidate in a publication in Products to Compound in Capter Revi		
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Organization: Philips Document type: Policy Requirement Reference: QS-ExC4-004

Function: Lighting Sustainability Document owner: Leon Konings Process reference: < 17.4 >

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 EU ROHS exemptions lists is replaced by the December 3 2008 EU Commission proposal Annex 1.1 is added with an explanation on homogeneous and article product declaration Beryllium: few exemptions and possibility for waivers were included. Cadmium and Mercury declaration obligation above 50 ppm, moved from the footnote to one of the remarks just below the table for more visibility. There was no change on the content. Perfluoroctane Sulfonates (PFOS's) compounds were added to the list as they will be restricted as from 27 June 2008 (EU DIRECTIVE 2006/122/ECOF).
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 Sum of all Polycyclic Aromatic Hydrocarbons (PAHs) (16 mentioned in EPA list) and Benzoapyrene: Those
substances are included in the UNECE Protocol to be formalized in Regulation 850/2004/EEC on Persistent
Organic Pollutants (POPs). Furthermore, also the "German Stiftung Warentest" or GS imposes this
requirements for consumer products, based on the German transposition of the General Product Safety
Directive (2001/95/EC) and the regulation on food contact materials (EC/1935/2004) to justify the legal basis
for this requirement.
Formaldehyde: requirements have been split into two categories, namely in products (in e.g. wooden
loudspeakers, bread roasters, etc.) and packaging material (incl. transportation material, like pellets). Official
requirements exist in many countries, like Germany Chem Verbot, Denmark statut. order nr 289, Austria,
Norway, Poland, Lithuania, Finland, The Netherlands, USA – CA (93120-93120.12, title 17, California Code of
Regulations). The limits in CA for HWPW were corrected.
Restricted Substances in Batteries: to follow legislation.
Chlorobenzene: general "chlorobenzene" was replaced by the two hazardous forms, hexachlorobenzene and
trichlorobenzene (CMR 1 and 2, respectively).
 Chromiun 6+ in plating process: Due to the difficulties to control the plating Cr6+ process, posing compliance
risks of products brought to the market by Philips, it is proposed to fully restrict use of this substance in any
plating or passivation process.
 Ozone Depleting Substances in processes: ODCs are subject of federal excise tax law applied to all imported
electronics in USA. As part of federal efforts to implement the Montreal Protocol, the U.S. tax code applies
excise taxes on the importation of a range of products – including electronics – based on the use or presence
of banned/restricted ODCs. These taxes apply even if the ODCs were only used as process chemicals in the
manufacture of the products and were never intended to be in the finished product. While there is a minimis
exception for certain types of products, this exception does not apply to electronics. Prove of non-use must
be delivered in order to apply for exemption.
For clarity and help, annexes containing a list with exemptions and more detailed information about the
substances of this list (CAS numbers, names, legislation information, use) were added.
 Due to its toxicity (CMR category 1) and to prepare ourselves on REACH, Beryllium is made restricted now.
 To solve problems at numerous suppliers, who only guarantee the ROHS limits, the restriction thresholds
limits for Cd in plastics and Hg are changed to the ROHS limits (100 and 1000 ppm, respectively). To be sure
that these supplied materials have Cd and Hg concentrations well below the legal ROHS limits, declaration
above 50 ppm is introduced for these substances. Therefore, also the text "declaration threshold" is changed
into "restriction threshold" on the restricted substance list.
Some minor text changes are made for phthalates on the restricted list and lead reporting for PMS on the
relevant list.

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