

New reference PE_005520 Old references: SUS-007; PHGR-GS-BP01-012

Version: 16

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Philips Regulated

Substances List

Royal Philips NV List of Regulated Substances in Products and Product Packaging

RSL 2020-1





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1 INTRODUCTION

At Philips we have been working to minimize the environmental impacts of our products, processes and services since 1970. Guided by the precautionary principle, Philips' 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 document, the "Royal Philips NV List of Regulated Substances in Products and Product-Packaging", referred to herein as the "Philips Regulated Substances List" or RSL.

This or newer versions of the present RSL List can be found at Philips website http://www.philips.com/shared/global/assets/sustainability/rsl.pdf

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

1.1 Purpose

This document contains the Philips 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 own requirements

The RSL is part of Philips global policy and therefore included in Philips 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 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 System. (This is not an exhaustive list but only an indication).

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

The RSL is aligned with the substances included in the BOMcheck Declaration System. The few deviations from BOMCheck in 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 RSL compared to BOMcheck

	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. Medical devices and professional lighting products Mains power supply cordsets are exempted and only declarable in BOMcheck.
Brominated Flame Retardants, PVC and (P)VC copolymers restricted in consumer products	6 and 7	1000	Additional restriction of PVC, (P)VC copolymers and Brominated Flame Retardants (other than PBBs, PBDEs and HBCDD) in any plastics parts. Mains powersupply cord sets are exempted and only declarable in BOMcheck, just like medical devices and professional lighting products.

1.2 Scope

The requirements as set up in the Philips Regulated Substances List are a global policy of Philips, even if local regulatory requirement may be less strict. Where there is a difference between the Philips 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.

This includes all consumables, accessories and non-Philips (owned) 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.

For non-Philips (owned) branded products that are placed on the market by Philips (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.

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

1.3 Deviations

In those cases where the supplier supplies or intends to supply articles to Philips that do not comply with the Philips RSL, the supplier needs to contact the Philips 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 a brand license product to the market that does not comply with the Philips RSL, licensee needs to contact the Philips representative for sustainability in the Brand Committee.

Recycled content

Philips strongly promotes the use of recycled materials, in particular the use of recycled plastics. Philips realizes that the use of recycled materials may cause challenges in terms of guaranteeing compliance to all substances included in the Philips RSL. For issues related to Philips RSL compliance for recycled materials, please contact Philips 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

Royal Philips NV accepts that some 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 needs to be monitored due to a regulatory requirement or because Philips 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 System

As referred to in Section 1.1., Philips will collect substance 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 has decided to utilize BOMcheck as a system 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 system 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 system 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 a company's compliance status every time regulatory changes are introduced. Philips recommends the brand license partners to follow the same way of working.

The BOMcheck system 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.philips.com/shared/global/assets/sustainability/rsl.pdf.

The BOMcheck substances list which also includes REACH SVHC's, Proposition 65 substances 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 requirements in this Table apply to all Philips products on homogeneous material level in all regions.

Substances (remark 1)	Maximum Concentration Limit ppm (mg/kg)	Remarks
RoHS Substance restrictions (Directive 2011/65/EU) (r	emark 1)	
Cadmium and Cadmium compounds (remark 2)	100	The restriction thresholds apply to all
Hexavalent Chromium compounds (remark 2)	1000	Philips products on homogeneous
Lead and Lead compounds (remark 2)	1000	material level in all regions.
Mercury and Mercury compounds (remarks 2 and 3)	1000	
Polybrominated diphenyl ethers (PBDEs) (remark 4)	1000	
Polybrominated biphenyls (PBBs) (remark 4)	1000	
RoHS Substance restrictions amendment 1 (Directive 2 March 2015)	2011/65/EU, as amend	ded by Directive (EU) 2015/863 of
Bis (2-ethylhexyl)phthalate; Di (2-ethylhexyl) phthalate (DEHP), CAS 117-81-7	1000	The restriction thresholds apply to all Philips products on homogeneous
Dibutyl phthalate; Di-n-butyl phthalate (DBP), CAS 84-74-2	1000	material level in all regions, with the exception of medical devices, which
Benzyl butyl phthalate; Butyl benzyl phthalate (BBP), CAS 85-68-7	1000	are declarable until July 2021. (remarks 5 and 6)
Diisobutyl phthalate; Di-i-butyl phthalate (DiBP), CAS 84-69-5	1000	

- 1. 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 (2006/66/EU; see also Table 4), the European ELV directive (2000/53/EC and the amendment 2011/37/EU). 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. Maximum concentration limit applicable for the metal (i.e., Cd, Cr⁶⁺, Pb and Hg) and not for the compounds (i.e., the concentration determination is based on the metal weight not the metal containing compound weight (for details see IEC 62321)-
- 3. Besides the RoHS obligations, Lighting Products should also comply with 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 (ErP); and (2) indicating the relevant ROHS exemption number within the section on RoHS in BOMcheck system.
- 4. Polybrominated diphenylethers (PBDE) are the same as polybrominated biphenylethers (PBBE); polybrominated diphenyloxides (PBDO) are the same as polybrominated biphenyl oxides (PBBO).
- 5. The four phthalates will be restricted for medical devices (category 8) and monitoring and control instruments (category 9), per 22 July 2021, but are currently declarable to prepare for compliance.
- 6. As per 7 July 2020 the four phthalates (individually or in any combination (i.e., sum)) will be restricted under REACH (EU/2018/2005 of 17 December 2018) in a concentration equal to or greater than 0.1 % by weight of the plasticised material in the article,-except for equipment in scope of RoHS, Medical Devices, Food Contact legislation. The restriction will also apply to toys and childcare articles.

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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 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 mechanical produc	cts in all application	ns			
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	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	Head on dialogatrian			
Monomethyl tetrachlorodiphenyl methane (Ugilec 141)	No additionally added content	Used as dielectrics			
Polychlorinated terphenyls (PCTs)	No additionally added content				
1,2,4-Trichlorobenzene	1000	Used as dielectrics, in any substance or preparation			
Sum of selected Phthalates Group 1 (DIBP, BBP, DBP, DEHP) (see remark 7)	1000	In plasticized material.			
Additional restrictions which apply to parts used	Additional restrictions which apply to parts used in toys and childcare products				
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			

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Substances	Maximum Concentration Limit ppm (mg/kg) or as given in the table	Particular use and further remarks	
Any individual PAH compound (see list under remark 8)	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 parts that	contain leather and	d 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 parts that	come into contact	with skin	
Nickel and nickel alloys (see remark 9)	0.5μg/cm²/week		
Any individual PAH compound (see list under remark 8)	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	1000	For example, use in cleaners	

- 7. DiBP added to the restriction. The scope of this restriction was amended from "Additional restrictions which apply to parts used in toys and childcare products" to all types of articles, including children's toys and childcare articles, and with a list of exemptions, e.g., for equipment which is in scope of RoHS, Medical Devices, Food contact legislation.
- 8. 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 207-08-9and 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.
- 9. ECHA guidance on defining "direct and prolonged skin contact can be found at: https://echa.europa.eu/documents/10162/13641/nickel restriction prolonged contact skin en.pdf. Does not apply to Medical

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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.

TABLE 3: Substances restricted or declarable by other legislation in products and packaging. Unless otherwise stated the limits are on homogeneous material level. Philips 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	products in all applicat	tions
Formaldehyde	No intentionally added content	In composite wood products or components (plywood, particle board and MDF) and textiles (see remark 10); U.S. EPA TSCA Title VI + California ATCM.
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
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.
Polychlorinated naphthalenes	No intentionally added content	With one or more chlorine atoms; applied as stabilizer and flame retardant in plastics; EU POP regulation, Swiss, Canada and Japan legislation
Polychlorinated biphenyls (PCBs)	No intentionally added content	EU POP regulation; use as plasticizers, flame retardants and dielectrics

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Substances	Maximum concentration limit ppm (mg/kg) or as given in the Table	Particular use / Legislation		
Polybrominated diphenyl ethers (PBDEs)	500	EU POP Regulation 2019/1021 on persistent organic pollutants; use as flame-retardants; exemption for materials/parts used exclusively in electrical or electronic equipment (under scope of EU RoHS, see Table 1). Threshold applies to the sum of the concentration of those substances.		
Perfluorooctanoic acid (PFOA) and its salts	0.025	Currently restricted in Norway (1000 ppm in all applications or for textiles 1 µg/cm²). All applications from 4 July 2020 restricted above 0.025 ppm by EU POP; RSL/BOMCheck limit before 2018 was not intentionally added/1000 ppm); PFOA, for example, is used as surfactant in manufacture of some fluoropolymers and fluoroelastomers.		
Additional Restrictions which apply to pa	rts used in toys and chi	ildcare products		
Di-n-pentyl phthalate (DPENP)	1000			
Di-n-hexyl phthalate (DHEXP)	1000	Applied in any material. US Consumer Product		
Dicyclohexyl phthalate (DCHP)	1000	Safety Improvement Act (CPSIA).		
Diisononyl phthalate (DINP)	1000			
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 11 for legislation)		
Tris(1,3-dichloro-2-propyl)phosphate (TDCPP/TDCP; CAS 13674-87-8)				
Flame retardant chemicals	1000	Applied in any material. This restriction does not apply to electronic components; US States bills (e.g, California)		
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 which come into contact with food				
BPA (Bisphenol A)	No content permitted	In all food contact materials in consumer products (see remark 12); French legislation		
Additional requirements which apply to parts used in medical devices				

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Substances	Maximum concentration limit ppm (mg/kg) or as given in the Table	Particular use / Legislation
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
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)
CMR 1A and 1B substances and endocrine disrupting substances (EDCs)	1000	Justify and label or restrict in any material which has invasive contact with the patient, or any material which transports or stores fluids or gases which contact the patient, per definition in EU MDR 2017/745 Annex 1 Section 10.4; the BOMCheck information page on this entry provides a substances list for CMR1A and 1B and EDCs likely to be used in medical devices in scope.
Additional requirements which apply to p	parts containing textiles	
Flame retardant chemicals	1000	Applied in any material. This restriction does not apply to electronic components; US States bills (e.g, California)
Additional restrictions which apply to par	ts which contain chem	ical products (liquids, gases, powders; as
Ozone depleting substances	No intentionally added content	All applications; Montreal protocol and EU Regulation No 2037/2000
Fluorinated Greenhouse gases (PFC, SF6, HFC)	Specific permission needed	EU regulation 517/2014

- 10. Composite wood finished goods must be labeled showing compliance with U.S. EPA TSCA Title VI regulation (it is voluntary to also label in compliance with 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.
- 11. 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.
- 12. For Philips 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 enforces the limits worldwide.

Substances	Maximum concentration limit ppm (mg/kg)	Remarks/Legislation
Cadmium and cadmium compounds (see remarks 2 and 13)	10	EU battery directive
Mercury and mercury compounds	1	Chinese Standard GB 24427-2009
Lead and lead compounds (see remark 13 and 14)	40	Chinese Standard GB 24427-2009
Perchlorates in all batteries	0.006	Labelling requirement in Californian regulation

- 13. Cadmium use is exempted for batteries used in emergency lighting (see European Battery directive (2006/66/EU; and for some spare parts for electric vehicles (2000/53/EC and the amendment 2011/37/EU). Additionally, cadmium and lead compounds use is exempted for batteries in some automotive applications (see European ELV directive (2000/53/EC and the amendment 2011/37/EU)
- 14. 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.



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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 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: Link to BOMcheck.

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.

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 the 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>.



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

Unless otherwise stated the limits are on homogeneous material level. Philips 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 application	ons	
Beryllium and Beryllium Compounds by weight of any material (see remark 15)	Declarable	1000
Brominated Flame Retardants in printed wiring board laminate (other than PBBs, PBDEs and HBCDD); restriction/declaration threshold for total bromine concentration by weight in homogeneous material used in printed wiring laminates (see remark 16)	Restricted in consumer products,	900
Brominated Flame Retardants (other than PBBs, PBDEs and HBCDD) in any plastics parts; restriction/declaration threshold for total bromine concentration by weight in homogeneous material used in plastics (see remark 16)	declarable in professional Lighting products and Medical devices (see remarks 16 and 17)	1000
Polyvinyl Chloride (PVC) and polyvinyl chloride copolymers in total chloride concentration by weight in homogeneous material (see remark 17)	remarks 16 and 17)	1000
Chlorinated Flame Retardants in printed wiring board laminate; declaration threshold for total chlorine concentration by weight in homogeneous material used printed wiring laminates	Declarable	900
Chlorinated Flame Retardants in any plastics parts; declaration threshold for total chlorine concentration by weight in homogeneous material used in plastics	Declarable	1000
Antimony trioxide in plastic materials;	Declarable	1000
Phthalates (see remark 18)	Declarable	1000
Additional restrictions which apply to parts used in lamps and lan	np ballasts	
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 into cont		
Azocolourants and azodyes which form certain aromatic amines (see remark 19)	Restricted	30
PAH compounds (German product safety requirement for consumer products)	Restricted	See Annex III for limit values
Additional restrictions which apply to parts that contain leather a	nd textiles	
Alkylphenol and alkylphenol ethoxylates (see remark 20)	Restricted	100

^{15.} By making these substances declarable, Philips intends to collect information on the presence of the Beryllium and Beryllium compounds also when no feasible technological alternatives exist, such as in the following applications: 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.

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- 16. Philips is pursuing a phase out of the use of BFRs in consumer products newly put on the market. Mains power supply cordsets are exempt from this policy. The use of BFRs needs to be declared to Philips via the BOMcheck system. For Philips 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 0.1% (1000 ppm maximum of Bromine) by weight in any homogeneous material and 0.09% (900 ppm maximum of Bromine) by weight in any homogeneous material used in printed wiring laminates. BFRs are declarable for professional Lighting products and Medical Devices and main power supply cordsets.
- 17. Philips 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 via the BOMcheck system. For Philips 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 cordsets are exempt from this PVC phase out. PVC is declarable for professional Lighting products, Medical devices and mains power supply cordsets.
- 18. See further in Annex II for all legal requirements for phthalates.
- 19. This restriction of Azo dyes goes beyond the legal restriction under REACH article 67 (see Table 2) as Philips restricts the use of Azo dyes in all applications that come into contact with the skin, and not only for textiles and leather. Also two additional aromatic amines are restricted in Philips compared to the 22 aromatic amines restricted under REACH Article 67, based on regulation in Japan, Thailand and China. These 2 additional aromatic amines are: 2,6-xylidine (CAS: 87-62-7) and 2,4-xylidine (CAS: 95-68-1).
- 20. 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.

TABLE 7: Additional restrictions in Product-Packaging

Unless otherwise stated the limits are on homogeneous material level. Philips 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
Arsenic compounds, applied for wood packaging	No intentionally added content	REACH Article 67, bans the use of arsenic compounds for the preservation of wood
Industry substances		
Polyvinyl chloride (PVC) and (P)VC 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.

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TABLE 8: Substances restricted in Manufacturing Processes

Substances	Maximum concentration limit ppm (mg/kg)	Application
Hexavalent Chromium (Cr ⁶⁺) and compounds (see remark 21)	Not permitted	Not permitted in passivation processes
Ozone Depleting Substances (see remark 22)	Not permitted	Not permitted in any manufacturing processes

- 21. Due to the difficulties to control the plating Cr⁶⁺ process, posing compliance risks of products (e.g. RoHS) brought to the market by Philips, 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.
- 22. 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 (EU RoHS) level

A "homogenous material" means one material of uniform composition throughout or a material, consisting of a combination of materials, that cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes. For example, a single material such as a thermoplastic (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.

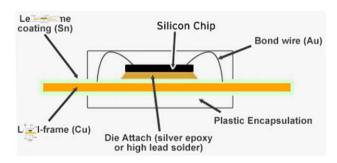


Figure 1: Material breakdown of an Integrated Circuit (IC) component

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%
- Ftc.

1.2. Article Definition

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	Abbreviation	CAS No.	EU RoHS restricted from 2019	Restriction REACH (1)	Restriction CSPIA	Proposition 65 declarable	Declaration as industry substance	MDD/ MDR labeling (3)	REACH declarable
			RSL Table 1	RSL Table 2	RSL Table 3	RSL Table 5.2	RSL Table 6	RSL Table 3	RSL Table 5.1
Bis (2-ethylhexyl)phthalate; Di (2-ethylhexyl) phthalate	DEHP	117-81-7	Х	Х	X (2)	х	х	Х	X (4)
Dibutyl phthalate; Di-n- butyl phthalate	DBP	84-74-2	Х	Х	X (2)	Х	Х	Х	X (4)
Benzyl butyl phthalate; Butyl benzyl phthalate	BBP	85-68-7	Х	Х	X (2)	х	х	Х	X (4)
Diisobutyl phthalate; Di-i- butyl phthalate	DIBP	84-69-5	Х		Х		х	Х	X (4)
Di-isononyl phthalate; Diisononyl phthalate	DINP	28553-12-0; 68515-48-0		Х	X (2)	Х	Х		
Di-isodecyl phthalate; Diisodecyl phthalate	DIDP	26761-40-0; 68515-49-1		Х		×	×		
Di-n-octyl phthalate	DNOP	117-84-0		Х			Х		
Di-n-hexyl phthalate	DHEXP/ DNHP	84-75-3			Х	х	х	Х	Х
1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters	DIHP	71888-89-6					Х	Х	Х
1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear	DHNUP	68515-42-4					Х	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	Х
Di-n-pentyl phthalate	DPENP/ DPP	131-18-0			х		х	Х	Х
Diisopentylphthalate	-	605-50-5					Х	Х	Х
1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear	-	68515-50-4					Х	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					х		Х
Dicyclohexyl phthalate	DCHP	84-61-7			Х		Х	Х	
1,2-benzenedicarboxylic acid, dipentylester, branched and linear		84777-06-0					Х	Х	Х

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). As per 7 July 2020 DEHP, DBP, BBP DiBP (individually or in any combination (i.e., sum)) will be restricted under REACH (EU/2018/2005 of 17 December 2018) in a concentration equal to or greater than 0,1 % by weight of the plasticised material in the article, except for medical devices and EEE. It will also apply to toys and childcare articles.

⁴⁾ REACH authorization per 21-02-2015.

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Same substances also restricted in REACH. CSPIA, USA: section 108 (see: https://cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Phthalates-Information)

³⁾ MDD: Medical Devices Directive; MDR: Medical Devices Regulation.



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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. See below table for details.÷

For each category, material needs to fill not only the total maximum allowable sum for all 15 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	Category 1: Materials	Category 2: Materials that ar	e not in	Category 3: Materials not covered by		EU REACH
		intended to be		Category 1, with intended or		Category 1 or 2, with intended or	
		placed in the	foreseeable long	foreseeable long-term skin		foreseeable short-term skin	
		mouth, or	contact (> 30 sec	conds) or short-	contact (≤ 30 sec	conds)	(x)
		materials in toys	term repetitive of	ontact with the			
		(Directive	skin	T		T	
		2009/48/EC) or	2a:	2b	3a	3b	
		articles for	Use by	Other	Use by	Other	
		children up to 3	children under	consumer	children under	consumer	
		years of age with intended long-	14 (mg/kg)	products (mg/kg)	14 (mg/kg)	products (mg/kg)	
		term skin contact		(IIIg/kg)		(IIIg/kg)	
		(> 30 seconds)					
		(mg/kg)					
Benzo[a]pyrene (BaP)	50-32-8	<0.2	<0.2	<0.5	<0.5	<1	х
Benzo[a]anthracene	56-55-3	<0.2	<0.2	<0.5	<0.5	<1	Х
Chrysene	218-01-9	<0.2	<0.2	<0.5	<0.5	<1	Х
Benzo[b]fluoranthene	205-99-2	<0.2	<0.2	<0.5	<0.5	<1	Х
Benzo[k]fluoranthene	207-08-9	<0.2	<0.2	<0.5	<0.5	<1	х
Dibenzo[a,h]anthracene	53-70-3	<0.2	<0.2	<0.5	<0.5	<1	х
Benzo[j]fluoranthene	205-82-3	<0.2	<0.2	<0.5	<0.5	<1	х
Benzo[e]pyrene	192-97-2	<0.2	<0.2	<0.5	<0.5	<1	х
Indeno(1,2,3-c,d)pyrene	193-39-5	<0.2	<0.2	<0.5	<0.5	<1	
Benzo(g,h,i)perylene	191-24-2	<0.2	<0.2	<0.5	<0.5	<1	
Phenanthrene	85-01-08						
Anthracene	120-12-7	<1 (sum)	<5 (sum)	<10 (sum)	<20 (sum)	<50 (sum)	
Fluoranthene	206-44-0	<1 (suiii)	<5 (suiii)	<10 (Sulli)	<20 (suiii)	<50 (suiii)	
Pyrene	129-00-0						
Naphthalene	91-20-3	<1	<2	<2	<10	<10	
Sum of 15 PAH		<1	<5	<10	<20	<50	

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ANNEX 4 - Revision History

Date Revision	Short Explanation
January 2020	Version 16
	Alignment with BOMcheck version 5.4.
	Remark 2: for metals in RoHS, added the clarification that the concentration determination is based on the metal weight not the metal containing compound weight (for details see IEC 62321).
	Remark 6: re-wording on the scope exceptions of the four phthalates restrictions under REACH
	(EU/2018/2005).
	Table 2: PFOA restriction deleted and moved to Table 3. In the new Table 3 entry (now under EU POP), the references to the time related exemption for medical devices were deleted: "except medical device" and "This 1000 ppm limit will be the limit for medical devices until 2032."
	Table 2: Sum of selected Phthalates Group 1 (BBP, DBP, DEHP) deleted under section "Additional restrictions which apply to parts used in toys and childcare products". New restriction for Sum of selected Phthalates Group 1 (DIBP, BBP, DBP, DEHP), 1000 ppm in plasticized materials under section "Restrictions for electrical and mechanical products in all applications".
	Remark 7 (Table 2): new remark explaining the changes on the scope of the Sum of selected Phthalates
	Group 1 (DIBP, BBP, DBP, DEHP) restriction, the new substance restriction (DIBP) and the with a list of
	exemptions (e.g., for equipment which is in scope of RoHS, Medical Devices, Food contact legislation).
	Remarks numbering and references updated accordingly.
	Table 3: new restriction under sections "Additional Restrictions which apply to parts used in toys and
	childcare products" and "Additional requirements which apply to parts containing textiles" for Flame retardant chemicals, 1000 ppm, applied in any material (except electronic components). US States bills (e.g, California).
	Table 3: deleted restriction for Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene (BNST), since it has been removed from the Canada's Prohibition of Certain Toxic Substances Regulations.
	Table 3: correction of "Polychloronaphtalenes" into "Polychlorinated naphthalenes", "chloro atoms" into "chlorine atoms" and "UN Stockholm Convention on POPs" into "EU POP regulation".
	Table 3: restriction on "Alkanes, C10-13, chloro (SCCP; Short chained chlorinated paraffins), 10000 ppm" deleted from sub-section "Additional restrictions which apply to parts which contain chemical products (liquids, gases, powders; as substance or preparation)" for alignment with BOMcheck.
	Remark 18 (Table 6): deleted specific example on declarable phthalates in medical devices.
	Annex 2: included reference to MDR: Medical Devices Regulation, in the table header and as remark 3.
	Annex 3: table adapted according to the new specifications for PAHs under GS Mark: number of PAHs
	reduced from 18 to 15- by removing acenaphthylene, acenaphthene and fluorene from the group of seven
	PAHs; scope of Category 1 expanded by including 'articles for children up to three years of age'; Categories
	2 and 3 divided into two sub-categories each, being 2a and 3a for 'products used by children under the age of 14' and 2b and 3b for 'Other consumer products (mg/kg)'; new limits for sub-categories 2a and 3a;
	category description deleted from introductory text.
July 2019	Version 15
,	Header: new Philips logo.
	Alignment with BOMcheck version 5.3.
	Section 2.1: added BOMcheck "system".
	Table 1: in introduction changed "restrictions" into "requirements".
	Table 1: divided into two sections: "RoHS Substance restrictions (Directive 2011/65/EU)" and "RoHS
	Substance restrictions amendment 1 (Directive 2011/65/EU, as amended by Directive (EU) 2015/863 of
	March 2015)". Added new column "Remarks" with details on scope, conditions and timelines.
	• Table 1.1 deleted. Substances moved to Table 1, under section "RoHS Substance restrictions amendment 1 (Directive 2011/65/EU, as amended by Directive (EU) 2015/863 of March 2015)"

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	Table 1: new remarks number 5 and 6 with details on four phthalates restriction date for category 8 and 9 and note about upcoming restriction under REACH in 2020 (except medical devices and EEE). Remarks numbering adapted throughout the document.
	 Table 3, section "Restrictions for electrical and mechanical products in all applications": corrected column "particular uses/ legislation" and remark 9 for Formaldehyde to reflect that label in compliance with U.S. EPA TSCA Title VI regulation is mandatory and it is voluntary to label also according to CARB ATCM standards.
	Table 3, section "Additional Restrictions which apply to parts used in toys and childcare products": added four CPSIA substances under section: Di-n-pentyl phthalate (DPENP), Di-n-hexyl phthalate (DHEXP), Dicyclohexyl phthalate (DCHP), Diisononyl phthalate (DINP).
	Table 3: new entry for Polybrominated diphenyl ethers (PBDEs), for materials/parts not under EU RoHS Scope
	Table 6: distinction between Br limit for printed wiring laminates and used in other plastics clarified also in remark 15.
	Annex 1: homogenous material definition in line with EU RoHS legal definition.
	Annex 2: separated columns for REACH and CPSIA restrictions. Marked new Table 3 CPSIA substances relevant for CPSIA. Adapted footnote 2.
	Annex 2: added note about upcoming restriction under REACH in 2020 (except medical devices and EEE) in remark 1).
	Annex 3: Naphthalene name corrected.
	Annex 4: added in "March 2019"the new document reference: PE_005520
March 2019	Version 14 – Typo correction
	New document reference: PE_005520
	Alignment with BOMcheck version 5.2.
	Section 1.1: removed versions numbers of RSL and BOMcheck (moved into Annex 4).
January 2019	Version 13.
	BOMcheck (declaration) "tool" changed into "system".
	Table 0 aligned with Table 6: added clarification that lighting products exempted are "professional"; deleted
	exemption for "mains power supply cordsets" for BFR restriction at 900 ppm; added "(P)VC copolymers" to BFR and PVC restriction at 1000 ppm.
	• Section 2.2, added "Proposition 65 substances" to the substances that can be found in BOMcheck substances list.
	• Table 1: added remark with clarification on maximum concentration limit applicable for the metal (i.e, Cd, Cr ⁶⁺ , Pb and Hg) and not for the compounds.
	Remarks numbering and references updated accordingly.
	Table 1.1, added note informing that as per 7 July 2020 new requirements on phthalates from EU/2018/2005 of 17 December 2018 will apply.
	Table 3: corrected TCCPP name by adding "phosphate".
	Table 3: added new entry (label and justify or restrict) for additional requirements which apply to parts used in medical devices "CMR 1A and 1B substances and endocrine disrupting substances (EDCs)".
	Table 4: added reference to remark 2 for cadmium and cadmium compounds restriction.
	• Table 6: changed "Beryllium Oxide" to "Beryllium compounds"; added "by weight of any material"; changed from "restricted" into "declarable".
	Table 6: added clarification that PVC requirements also apply to "poly" vinyl chloride copolymers.
	Table 6: correction/alignment with BOMcheck for chlorinated flame retardants declarable from 900 ppm by replacing "plastics" for "printed wiring laminates" and chlorinated flame retardants declarable from 1000 ppm by replacing "printed wiring laminates" for "plastics".
	Remark 12 on Beryllium adapted to explain the changes in the Beryllium requirements (Table 6) from
	restricted (when feasible alternatives exist) into declarable (to collect information also when no feasible technological alternatives exist.
	Annex 2, note 2: new hyperlink added for the Phthalates Business Guidance & Small Entity Compliance
	Guide

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	Annex 2: updated RSL Table references for Proposition 65 ("RSL Table 5.2") and for REACH declarable ("RSL
	Table 5.1"); changed Proposition 65 from "restricted" into "declarable"; deleted remarks 3), 4) and 5) on
	Proposition 65 and other remarks renumbered.
	Format changes.
May 14, 2-18	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 branded and owned products when by-packed or integrated in Philips
	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.
February 8,	Version 11
2018	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 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.
Nov 30, 2017	Version 10.
	SUS-007 identification added to be able to link the document to the new E2E PEPF processes. Content
	remains the same as previous version: PHGR-GS-BP01-012 version 9.
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 has 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 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.
	Table 0 adapted to the changes not included in BOMcheck yet and format adapted

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	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 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, The shold was changed from "no content permitted" to "no intentionally added content" for PCTs, DBBT, The shold was changed from "no content permitted" to "no intentionally added content" for PCTs, DBBT, The shold was changed from "no content permitted" to "no intentionally added content" for PCTs, DBBT, The shold was changed from "no content permitted" to "no intentionally added content" for PCTs, DBBT, The shold was changed from "no content" fo
	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
April 2010	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 POP regulations
	2015/2030 and 2016/293.
	Minor text changes in Chapter 1.3, 2.1 and 2.2.
January 2016	Version 6
,	Edited the Table 0 to reflect the differences between RSL and Bomcheck list of reportable and declarable
	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 9. However last always in the property of the second string to t
	Table 8, Hexavalent chromium passivation term clarified Appay Larticle definition changed due to ELL Official Court ruling on 10th September 2015.
	 Annex I, article definition changed due to EU Official Court ruling on 10th 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
Junuary 2013	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
	Table 3, revised the scope and limit values for TRIS flame retardants and added new TRIS substance Tris(2-
	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 footnote describing the Philips BPA policy
	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

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	Table 6, the scope of PVC restriction clarified; also vinylchloride copolymers belong to the scope (previously martianed in PVC feetrate).
	mentioned in PVC footnote) Table 7, included other form, nelymeric packaging materials into the scene of ERS han
	 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)
restauty 2011	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 COMMAND AND AND AND AND AND AND AND AND AND
	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
	 Added hyperlink to RoHs recast in Official Journal of European Union and to BOMcheck with ELV and RoHS exemptions in Chapter 3, Table 1
	Adjusted table sub-header to "toys and childcare products" in Chapter 3, Table 2

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 Organostannic compounds restriction corrected to "tri-substituted organostannic compounds"in Chapter 3, Table 2 	
Dioctyltin and Dibutyltin compounds restriction added to Chapter 3, Table 6.	
 Removed remarks from asbestos, Ozone depleting substances, PFOS exemptions in Chapter 3, Table 2Added 	b
new legislation concerning the phthalates use, based on Proposition 65 of California, USA, to Chapter 3, Tab 3	le
Added a remark on the phthalates in the scope of new Proposition 65 regulation 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 new batteries regulations to Chapter 3, Table 4	
Cadmium remark for Medical devices removed from Chapter 3, Table 4	
 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 	į
Removed the substances table for REACH Candidate list substances and added a reference to BOMcheck as	
source of information for Chapter 3, Table 7	
Old Table 7 contents moved to be part of Chapter 3, Table 3	
Old Table 8 contents moved to be part of Chapter 3, Table 3	
Annex I on RoHS exemptions removed	
Annex II with examples on CAS-names removed	
- 2010 • Version A, CSO-BP01-2010-001	
 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-BP01-2006-11 and CSO-BP01-2006-12).	
The layout of the Philips RSL was aligned with the BOMcheck IT System.	
 Inclusion of BOMcheck substances, such as tars oils, creosotes, and dioxins. 	
 Hg declaration - ErP(2009/125/EC) Implementing measure EC No 245/2009 and Philips policy for Lighting products in anticipation of the revision the EU ROHS exemption list. 	
 List of exemptions of Annex 1 updated (new exemptions added according to Decision 2009/443/EC. Expired 	
exemptions are crossed out).	
 Updated Annex 1 with exemptions for ROHS Categories 8 and 9 in anticipation of ROHS Recast. 	
• The List has been broadened from Substances in products to other relevant applications like packaging and	
transport material. Also regulated declarable substances as requested by REACH have been included.	
 Dimethylfumarate restricted in all applications according to Decision 2009/251/EC. 	
 Restriction of Phenol and Phenolic compounds in PCB's was removed, as there is no reason to believe it still 	
represents a problem in this application.	
SCCP are no longer restricted but declarable, in line with the REACH regulation.	
 PVC and BFR declaration should comply with Industry guide – IEC 61249-2-21. 	
Expanded Polystyrene (EPS) restricted when used in consumer products.	
 Limits for (gas) emissions from products, product-packaging and transport material as to fulfil with Dutch requirements (http://www.vrominspectie.nl/actueel/publicaties/uitvoering-motie-poppe-boelhouwer- containers-met-gevaarlijke-gassen.aspx). Substances being controlled are Carbon monoxide, Carbon dioxid Cyanide, Ammonia, Sulfurylfluoride, Chloropicrine, Dichloroethane, Benzene, Styrene, Toluene and Xylene and fumigants, Phosphine and Methyl bromide. 	e,
Lead in Childcare products according to USA requirements was added.	
Beryllium: exemption Be metal alloy added (where no feasible technological alternative exist).	
EU ROHS substances for medical devices were added to the restricted List with a phase-out date of 1-1-201.	3.
Formaldehyde emission levels from composite wood have been changed according to California legislation	
• Restriction to Cr ⁶⁺ in processes limited to passivation processes	
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	



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7-8-2008	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 remark
	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).
	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). Officia 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 an trichlorobenzene (CMR 1 and 2, respectively).
	• Chromiun ⁶⁺ in plating process: Due to the difficulties to control the plating Cr ⁶⁺ 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 minim
	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.
1-1-2007	• 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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