



Regulation (EC) No 1907/2006 (REACH) is a European Union chemicals regulation that entered into force of law on June 1, 2007, with phased in deadlines to 2018. REACH is the Regulation, Evaluation, Authorization and Restriction of Chemical substances. As part of Mitel's standard process, component selection requires suppliers to provide complete REACH information to Mitel as per Article 33 and supplier REACH information is refreshed on an ongoing basis to ensure the most recent data is available as the list of SVHCs evolves.

Registration and Notification of Substances in Articles (Article 7 of REACH)

Registration is according to Article 7.1 of the regulation if the following two parameters are met:

- The substance is imported by Mitel at a quantity of more than 1 ton per year
- The substance is intended to be released under normal or reasonably foreseeable conditions of use

Mitel's products are not designed to intentionally release substances into the environment; therefore, Mitel cannot register substances with the European Chemical Agency under this clause of the regulation.

Notification is required according to Article 7.2 of the regulation if a substance of very high concern (SVHC) as indicated on the candidate list is present in the article (product) under all of the following four conditions:

- The substance is imported by Mitel into the EU at a quantity greater than 1 ton per year
- The substance is present in the article above a concentration of 0.1% weight by weight
- The substance is exposed to humans or the environment during normal or reasonably foreseeable conditions of use, including disposal
- The substance has not already been registered for the same use

Article 7.7 of the regulation states this obligation takes place six months after the substance is published on the candidate list and not earlier than June 2011. If applicable, Mitel will take the appropriate steps to comply with this requirement.

Communication (Article 33 of REACH)

Article 33 requires a producer to provide the recipient/end user with sufficient information to allow safe use of this product. This should include, as a minimum, the name of the substance, if both of the following conditions are met:

- The substance is listed on the candidate list
- The substance is present in the article at a concentration of above 0.1% weight by weight

Mitel acknowledges the importance of REACH and is aware that the Candidate List of Substances of Very High Concern (SVHC) currently contains over 250 entries, updated twice per year by ECHA. Mitel is continually contacting its supply chain to determine if any of the substances on the candidate list are used in its products and, if so, at a concentration above 0.1% w/w of the given article.



Based on inquiries and evaluation of Mitel suppliers, the products in the below table include components (such as capacitors, connectors, PSU's, cable assemblies, plastics and alloys) which may contain Substances of Very High Concern (SVHC) in concentration at or above 0.1% weight by weight:

REACH SVHC Name/CAS#	Analog Phone	Digital Phone	IP Phone	DECT	Controllers	Power components
Lead 7439-92-1	X	X	X	X	X	X
EGDME 110-71-4					X	
Dodecachloropentacyclo 135821-03-3	X	X	X		X	
Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) 26523-78-4				X	X	
Dodecamethylcyclohexasiloxane 540-97-6	X	X	X		X	
2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328) 25973-55-1		X	X	X		
dimethylacetamide 127-19-5	X	X	X			
Propanesultone 214-317-9				X		
TBBPA 79-94-7		X	X			

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