

<b>Viasat, Inc.</b>	Process Area: <b>Quality</b>	Document Number: <b>PR000608</b>	Revision: <b>007</b>
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The following provisions with their terms and conditions shall become an integral part of the purchase order to the extent specified in the purchase order and shall become a supplement to the presently existing terms and conditions of the purchase order. All specifications and standards referenced in this document are the latest issue in effect at the time of Purchase Order placement, unless otherwise stated. These provisions apply to all Viasat facilities and divisions as appropriate.

This specification is not intended to list all product limitations or restrictions that are or may be in the future covered by law or legal restrictions. The seller has the obligation to comply with all applicable legal, regulatory, and Viasat restrictions. This specification does not diminish or relieve the seller from complying with local applicable legal, regulatory, or Viasat restrictions.

Precedence: If a conflict occurs between this specification and a Viasat individual specification the Viasat specification shall prevail if no laws or regulations are violated.

This specification is in addition to and does not in any way limit or supersede any other product specification that may be established by Viasat Inc.

## 1 Ozone Depleting Substances

Ozone depleting substances (ODS) per EPA Regulations 601-607 of the Clean Air Act and the Montreal Protocol shall not be used in process of manufacturing parts, assemblies, components or raw materials unless a written exemption is granted by Viasat Inc. Environmental Compliance Management for military applications.

- (a) Suppliers shall not introduce ozone depleting substances into the product during the manufacturing process.
- (b) Suppliers' standard Certificate of Conformance (C of C) shall be verification that product has been built in accordance with these requirements for ozone depleting substances and Viasat's legal terms, conditions and specifications.
- (c) If foreign suppliers use Class 2 ozone depleting substances during the manufacture of products, they must appropriately identify this on product shipping to the USA in accordance with government regulations.
- (d) Viasat Inc. reserves the right to visit the plant of the seller or seller's sources to survey facilities, systems, and/or product to determine satisfactory conformance to the applicable environmental specifications. Viasat representative(s) may elect to conduct inspection either on a random basis or to the extent of 100% inspection. The seller will be notified if Viasat inspection is to be conducted on specific shipments. No shipments are to be held for Viasat inspection unless notification is received prior to, or at the time of, material being ready for shipment.

## 2 RoHS Compliance

Products must be compliant to European Union (EU) Directives 2011/65/EU and Addendum 2015/863 as of July 22, 2019. Directive 2011/65/EU superseded EU Directive 2002/95/EC. Any reference on Viasat drawings or specifications to EU Directive 2002/95/EC or Directive 2011/65/EU shall be interpreted to also require compliance to Addendum (EU) 2015/863 after July 22, 2019. Marking must be applied as required per items (h) through (n) below.

When specified by Viasat Product Management or Viasat Compliance Management, product must be compliant to China RoHS2 requirements as specified in SJ/T11363-2006 and subsequent released requirements, per Restricted substance thresholds per GB/T26572-2011 and SJ/T11364-2014 and provide material declarations per items (h) through (r) below.

- (a) Suppliers shall certify that RoHS substances were not introduced into the product during the manufacturing process.
- (b) Suppliers shall certify that the product is built to the specifications, prints and/or defined requirements.

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- (c) If Viasat Inc. specifies the raw materials, assemblies or component, suppliers shall certify via a material declaration that product has been built in accordance with these requirements and specifications.
- (d) The supplier shall maintain a process or system to ensure that RoHS compliant parts and Non-RoHS compliant parts are segregated and properly identified as to the compliance status. The supplier shall maintain appropriate controls and RoHS marking with vendor parts to ensure that received component parts are not mixed on reels or other packaging methods.
- (e) Viasat Inc. reserves the right to visit the plant of the seller or seller's sources to survey facilities, systems, and/or product to determine satisfactory conformance to the applicable environmental specifications. Viasat representative(s) may elect to conduct inspection either on a random basis or to the extent of 100% inspection. The seller will be notified if Viasat inspection is to be conducted on specific shipments. No shipments are to be held for Viasat inspection unless notification is received prior to, or at the time of, material being ready for shipment.
- (f) Viasat, Inc. reserves the right to have any advertised RoHS compliant product tested for RoHS compliance. If product is determined to be noncompliant it is the responsibility of the supplier to replace or correct all noncompliant material at the seller's expense.
- (g) Viasat Inc. requires RoHS Declarations prior to product shipment or with the first article approval [items (h) through (n) below] per PR000512 QAPP item number 12 and/or 12A. Upon request, the seller shall provide a RoHS Declaration within 5 business days of the request. Viasat Training document for declarations PR002344 provides minimum acceptable requirements for material declarations. This document can be found on the Viasat.com website under "Supplier Information".

The requirements for EU RoHS Material Declarations are as listed below:

- (h) RoHS Compliance Material Declarations signed or authorized by personnel with appropriate authority is required on Company letterhead/website. RoHS certifications are valid for five years from the signature date.
- (i) Any RoHS technical exemptions that are used must be identified on the Material Declaration, if the product is fully compliant then a statement such as "No RoHS technical exemptions apply" must be included in the Material Declaration.
- (j) Website declarations are acceptable if the items above in (h) and (i) are covered and product weight is provided.
- (k) Drawings or Spec sheets of products that just state "RoHS Compliant" is not an acceptable Material Declaration.
- (l) A RoHS statement of Compliance (a and b above) with supporting test results is acceptable provided any technical exemptions are identified that cause test results to be above acceptable RoHS PPM levels.
- (m) Product homogenous material reports in PPM, percentages or weights are acceptable provided product mass (weight) and (h) and (i) are included.
- (n) IPC1752A XML formats Class1-6, IEC-62474, IPC 1754, Compliance Map Excel Declaration provided by Viasat and company formats are acceptable provided that all required fields on the form are completed. Suppliers are encouraged to use this format as the data will automatically load into Viasat's Environmental database.

It is the responsibility of Viasat's Product Managers to notify Viasat Supply Chain if China RoHS is required. In addition to the requirements stated in above, the following requirements apply for a China RoHS:

- (o) If EU RoHS technical exemptions are identified, then the China Declaration must include the "Environmentally Friendly Use Period" in years as identified by your company per SJ/T 11364-2014.
- (p) EU RoHS and China RoHS declarations may be combined into one Material Declaration.
- (q) In addition to the requirements stated above, additional marking and documentation is required for finished products such as Cable Assemblies, RF equipment, Servers, Computers, monitors, etc. These requirements are covered below under "Environmental Marking Requirements".
- (r) Per the China RoHS SJ/T11364-2014 "Marking Requirement for Control of Pollution Caused by Electronic Information Products" and Ministry of Information Industry (MII) initiative, effective **July 01**,

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**2016**, all product received in country (China) must be properly marked with the appropriate compliance labeling as directed within the aforementioned directive. See PR001158 for China marking guidance.

### 3 REACH Compliance

Within the European Union REACH, (EU) 1907/2006 E/C, is controlled by European Union's European Chemical Agency (referred to as ECHA). Unlike RoHS, chemical substances are being added to this ECHA candidate list called Substances of Very High Concern (SVHC's) on a regular basis. Suppliers to Viasat are required to monitor the SVHC candidate list and report any SVHC's that are in products supplied to Viasat that exceed an SVHC limit of 0.1% wt/wt. Please note SVHC's above the limits will not be considered a product nonconformance. However, if the seller does not provide regular updates (60-90 days) after the SVHC's are updated, this may result in a Supplier Corrective Action. These notifications must be sent to [Compliance-ProductEnvironmental@Viasat.com](mailto:Compliance-ProductEnvironmental@Viasat.com).

Suppliers must comply with European Union Regulation 1907/2006 E/C and supply material declarations.

- (a) Suppliers shall certify that all REACH substances introduced into the product during the manufacturing process are declared accordingly.
- (b) Suppliers shall certify that the product is built to the specifications, prints and/or defined requirements.
- (c) If Viasat Inc. specifies the raw materials, assemblies or component, suppliers shall certify via a material declaration that product has been built in accordance with these requirements and specifications.
- (d) Suppliers shall provide Viasat Inc. REACH updates in accordance with items (i) through (s) below.
- (e) Viasat Inc. reserves the right to visit the plant of the seller or seller's sources to survey facilities, systems, and/or product to determine satisfactory conformance to the applicable environmental specifications. Viasat representative(s) may elect to conduct inspection either on a random basis or to the extent of 100% inspection. The seller will be notified if Viasat inspection is to be conducted on specific shipments. No shipments are to be held for Viasat inspection unless notification is received prior to, or at the time of, material being ready for shipment.
- (f) The seller shall provide a valid REACH Safety Data Sheet (SDS) in the European Union ECHA English format when required with every shipment for substances, preparations, or articles with intentional release. Disclosure must include all substances on the current published SVHC candidate list. USA or Australia GHS compliant SDS may be acceptable under some conditions provided all hazardous substances are identified. All hazardous substances should be classified and labeled according to the Globally Harmonized System (GHS) of Classification and Labeling. Please contact the Viasat Environmental team at [Compliance-ProductEnvironmental@viasat.com](mailto:Compliance-ProductEnvironmental@viasat.com) for pre-approval of other country formats.
- (g) Viasat, Inc. reserves the right to have any advertised REACH compliant product tested for REACH compliance. If product is determined to be noncompliant it is the responsibility of the supplier to replace or correct all noncompliant material at the seller's expense.
- (h) Viasat Inc. requires REACH Material Declarations prior to product shipment or with the first article approval [items (i) through (s) below] per PR000512 QAPP item number 12 and/or 12A. Upon request, seller shall provide a REACH Declaration within 5 business days of the request. Viasat Training document for declarations PR002344 provides minimum acceptable requirements for material declarations. This document can be found on the Viasat.com website under "Supplier Information".

The following information is required on the REACH Material Declaration and must be provided regardless of the presence of SVHCs in the seller's end-product:

- (i) REACH Compliance Material Declarations signed or authorized by personnel with appropriate authority is required on Company letterhead/website.
  - (j) Identification if the product is an article, article with intentional release, preparation or substance.
  - (k) Identification of any SVHC above the 0.1% wt/wt in the supplied product and substance weight (PPM or percentage) of any article within the shipped product. (Note: Once an Article always an article [refer to EU case: C-106/14])
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- (l) The ECHA SVHC Candidate List date or number of substances that the product list was scanned/analyzed against.

Note: Viasat Inc. has a standard form PR001165 that may be used if your company does not have a standard format. This form can be found by the supplier or fabricator at the following Viasat link:

<http://www.Viasat.com/company/about/supplier-information>

This form may be sent to the seller by Viasat Supply Chain, Quality Assurance or Environmental Compliance [Compliance-ProductEnvironmental@Viasat.com](mailto:Compliance-ProductEnvironmental@Viasat.com) upon request or suppliers may obtain form from the Viasat website listed above. Please make sure suppliers' part numbers are included on the form.

New requirements under EU REACH for SVHC in articles or in complex objects (Products), requires product registration via SCIP beginning January 5, 2021. ~~implementation of the EU REACH requires product registration in the Substances of Concern in articles as such or in complex objects (Products), or SCIP, beginning January 5, 2021.~~ Suppliers to Viasat are ~~additionally~~ required to provide information to support registration of Viasat products, including:

- (m) ID number if products provided have been previously submitted for SCIP registration
- (n) TARIC code
- (o) Distinguishing characteristics (mass, dimensions, color...)
- (p) Safe use instructions
- (q) Submitted manufacturers product name
- (r) Was the product produced within the EU?
- (s) REACH candidate list version

#### **4 WEEE Compliance**

Products must be compliant to WEEE Directive 2012/12/EU. Marking must be applied as required per item (d) below.

- (a) Suppliers shall certify that the product is built to the specifications, prints and/or defined requirements.
- (b) If Viasat Inc. specifies the raw materials, assemblies or component, suppliers shall certify via a material declaration that product has been built in accordance with these requirements and specifications.
- (c) The supplier shall provide packaging information with information requirements specified in PR002413. Reporting shall be in compliance with PR002412.
- (d) Viasat Inc. does not hold the seller responsible for European Product take back at the end of product life, unless contractually required. WEEE marking per PR000450 is required as convenience for electronic & electrical products upon determination of the following items;
  - a. If determined by Viasat that the finished goods product will ship to the European Union in the as received condition from the seller and no fixed site or military EU exemptions apply
  - b. Finished Goods fall under the definition of a covered WEEE item per Directive 2012/19/EU and subsequent amendments and changes
  - c. Subassemblies or fabricated parts that become part of a Viasat upper level assembly typically are not required to have WEEE marking unless specifically called out on the drawing or specification.
  - d. WEEE (Wheelie bin) Marking for Product Takeback. Label must include:
    - i. Company logo, Address, Viasat Part number & Country of Origin is required in addition to the wheelie bin marking on product labeling where applicable or on packaging and manual if product does not permit to be on the product
    - ii. CE Marking per [Directive 93/68/EEC](#) marking permanency must be in accordance with Viasat, Inc. PR000450 and/or CENELEC EN50419:2005.

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## 5 Packaging Compliance

Suppliers must comply with Directive 94/62/EC and subsequent revisions and United States Toxics in Packaging Prevention Act (TIPPA) and supply a certificate of compliance upon request for any supplier packaging that was used to ship product to Viasat. Suppliers shall supply a certificate of compliance for all designed packaging items that are purchased by Viasat.

- (a) Suppliers shall certify that heavy metals are not above limits in any finalized packaging materials used to ship products to Viasat.
- (b) Suppliers shall certify that designed packaging items are made to specifications, prints and/or defined requirements and are not above limits for any heavy metal requirement.
- (c) If Viasat Inc. specifies the raw materials or components of a packaging item, suppliers shall certify via a material declaration, per items (j) through (n), that packaging has been made in accordance with these requirements and specifications. The packaging supplier shall provide a Packaging Material Declaration with information requirements specified in PR000634.
- (d) All packaging and printed material & products shipping from Viasat to China must be China RoHS compliant and must be marked according to China RoHS Standards.
- (e) Packaging material must be recyclable or reusable and must be marked with the appropriate international recycling/reuse symbol to facilitate recycling or reuse. Some examples of the common markings are identified in PR001158.
- (f) Heavy Metals shall not be greater than 100 PPM for Lead, Mercury, and Hexavalent Chromium and less than 50 PPM for Cadmium. The sum of all four heavy metals cannot exceed 100 PPM by weight per US state laws (TIPPA) and EU Directive 94/62/EC
- (g) All packaging material shall be of non-ozone depleting materials; ref. Volume 40 of the Code Of Federal Regulations, Part 82, Clean Air Act, Title VI.
- (h) Packaging material shall meet the requirements of REACH Regulation 1907/2006 (EC). If any Substances of Very High Concern (SVHC) per REACH Annex XIV are above the 0.1% wt/wt, then Viasat Environmental Compliance team shall be notified via Email at the following address; [Compliance-ProductEnvironmental@Viasat.com](mailto:Compliance-ProductEnvironmental@Viasat.com). As REACH substances are added to Annex XIV, it is the Supplier's responsibility to automatically notify Viasat Inc. of any SVHC's above the 0.1% wt/wt. when changes are made to REACH SVHC list.
- (i) Viasat, Inc. reserves the right to have any advertised packaging item that is compliant to TIPPA or Directive 94/62/EU tested for compliance to the corresponding regulation. If product is determined to be noncompliant it is the responsibility of the supplier to replace or correct all noncompliant material at the seller's expense.
- (j) Viasat Inc. requires Packaging Material Declarations prior to product shipment or with the first article approval [items (k) through (n) below] per PR000512 QAPP item number 12 and/or 12A. Upon request, the seller shall provide a Packaging Declaration within 5 business days of the request. Viasat Training document for declarations PR002344 provides minimum acceptable requirements for material declarations. This document can be found on the Viasat.com website under "Supplier Information".

Declarations of Packaging compliance must adhere to the following requirements:

- (k) Packaging Compliance Certificates signed or authorized by personnel with appropriate authority is required on Company letterhead/website.
- (l) Identification of whether the sum is equal to or above the 0.01% wt/wt threshold for all applicable heavy metals in the supplied packaging item. (Note: If the sum of heavy metals is below 0.01% then the packaging can be reported as compliant)
- (m) The individual concentrations for Heavy Metals shall not exceed concentrations of 100 PPM for Lead, Mercury and Hexavalent Chromium and 50 PPM for Cadmium.
- (n) If multiple components are used for a packaging item a declaration for the entire item or each individual component is acceptable

Note: Viasat Inc. has a standard form PR000634 that may be used if your company does not have a standard format. This form can be found by the supplier or fabricator at the following Viasat link;

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<http://www.viasat.com/company/about/supplier-information>

This form may be sent to the seller by Viasat Supply Chain, Quality Assurance or Environmental Compliance [Compliance-ProductEnvironmental@viasat.com](mailto:Compliance-ProductEnvironmental@viasat.com) upon request. Please make sure supplier's part numbers are included on the form.

There are various packaging and product labeling marking requirements implemented around the world to help identify aspects of the product and/or package. For more information on product and packaging markings refer to PR001158 for greater detail about global packaging procedures.

## 6 California Proposition 65 Compliance

California's Safe Drinking Water and Toxic Enforcement Act of 1986 requires that the Governor revise and republish at least once per year the list of chemicals known to the State to cause cancer or reproductive toxicity. Chemical identification requirements are in accordance with California OEHHA website. Consumer products shipping in or to Viasat or Viasat customer's locations in the state of California shall ensure products are compliant and/or are appropriately labeled according to this California regulation.

- (a) Acceptable Proposition 65 verification documents are as follows:
  - a. Full Material Declarations and applicable product/packaging labeling
  - b. Supplier Prop 65 Declarations and applicable product/packaging labeling
  - c. Toxicology Reports (if required)
  - d. Product and packaging shall be properly labeled according to California Proposition requirements.
- (b) Viasat Inc. requires Prop 65 Material Declarations prior to product shipment or with the first article approval per PR000512 QAPP item number 12 and/or 12A. Upon request, the seller shall provide a Prop 65 Declaration within 5 business days of the request. Viasat Training document for declarations PR002344 provides minimum acceptable requirements for material declarations. This document can be found on the Viasat.com website under "Supplier Information".

## 7 POPs Compliance

Product shall meet Persistent Organic Pollutants requirements per Regulation (EU) 2019/1021 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 20 JUNE 2019 ON PERSISTANT ORGANIC POLLUTANTS and subsequent regulatory updates. Suppliers shall provide declarations of the inclusion of any POPs regulated under Annexes I-IV per the most updated version of (EU) 2019/1021.

- (a) Suppliers shall certify that the product is built to the specifications, prints and/or defined requirements.
- (b) If Viasat Inc. specifies the raw materials, assemblies or component suppliers shall certify via a material declaration that product has been built in accordance with these requirements and specifications.

## 8 Corrosion Resistance Compliance

Products shall meet the requirements listed in MIL-STD-889C and subsequent updates unless superseding material requirements conflict with those of MIL-STD-889C. In cases of nonconformance to these requirements, suppliers shall apply for exemption to these requirements by contacted the Viasat Environmental Compliance team at [Compliance-ProductEnvironmental@viasat.com](mailto:Compliance-ProductEnvironmental@viasat.com).

## 9 Biocide Compliance

Product shall meet the requirements of ECHA's Biocidal Products Regulation (EU) No 528/2012 (BPR) and subsequent regulatory updates. Suppliers shall provide declarations of the inclusion or past use of any biocides in/on a product per the most updated version of (EU) No 528/2012 (BPR).

- (a) Suppliers shall certify that the product is built to the specifications, prints and/or defined requirements.
  - (b) If Viasat Inc. specifies the raw materials, assemblies or component, suppliers shall certify via a material declaration that product has been built in accordance with these requirements and specifications.
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- (c) The supplier shall provide biocide information to complete authorization of the use of biocide per (EU) No 528/2012 (BPR).

## 10 TSCA Compliance

Product shall meet the applicable provisions required under the Toxic Substances Control Act of 1976 (TSCA) and implement subsequent regulatory updates as necessary. Suppliers shall disclose hazardous PBT chemicals per Section 6, declarations of the inclusion of chemicals on the TSCA inventory in any product supplied to Viasat.

- (a) Suppliers shall certify that the product is built to the specifications, prints and/or defined requirements.
- (b) If Viasat Inc. specifies the raw materials, assemblies or component suppliers shall certify via a material declaration that product has been built in accordance with these requirements and specifications.

## 11 Aerospace Compliance

It is the responsibility of Viasat's Product Managers to notify Viasat Supply Chain if IAEG's Declarable Substances List compliance is required. Products with this requirement shall be compliant to the requirements conglomerated in IAEG's Declarable Substances List (AD-DSL) available on the IAEG website. Suppliers shall provide material declarations using the IAEG Aerospace and Defense Substance Reporting Tool (AD-SRT) available on IAEG's website. Please contact the Viasat Environmental team at [Compliance-ProductEnvironmental@viasat.com](mailto:Compliance-ProductEnvironmental@viasat.com) for pre-approval of other declaration formats.

## 12 Viasat, Inc. Purchased Raw Material/ Chemicals

With each raw material shipment to Viasat Inc., the seller shall forward reports of mechanical properties and chemical composition to show evidence of conformance to all applicable REACH (SVHC's), RoHS, California Proposition 65 and other applicable regulations as applicable for all raw material used in fabrication of the ordered product.

With shipment of chemical orders, the seller shall forward reports of chemical composition to show evidence of conformance to applicable specifications for all raw material used in the ordered material. This report shall comply with the requirements of the Material Safety Data Sheet (MSDS) and EU ECHA (Safety Data Sheets (SDS) and shall be attached to the first article inspection report (FAIR) or sent to [Compliance-ProductEnvironmental@Viasat.com](mailto:Compliance-ProductEnvironmental@Viasat.com) if a first article inspection report is not required.

## 13 Viasat Fabricated or Spec Items

13.1 Fabricated Item Environmental Compliance wording as it relates to Mechanical Drawings

### Requirement Update Notification:

**The environmental compliance note below supersedes all ROHS compliance notes.**

**As of January 02, 2013 EU Directive 2002/95/EC was superseded by EU Directive 2011/65/EU. All references to RoHS 2002/95/EC shall be interpreted to mean the requirements specified in EU DIRECTIVE 2011/65/EU.**

This item may be referenced or the following wording may appear on Viasat Inc. Mechanical Drawings:

### Environmental Compliance:

Finished part to be ROHS and REACH compliant per EU Directive 2011/65/EU and EU Regulation 1907/2006 and shall not use ozone depleting substances per US regulatory requirements. Fabricator shall add a unique permanent identification mark in accordance with E-QAPP PR000608 "Fabricator Facility Marking". Material declarations for ROHS and REACH (SVHC's) shall be provided and updated as needed in accordance with the requirements of PR000608. REACH SVHC declaration updates shall be forwarded to: [Compliance-ProductEnvironmental@Viasat.com](mailto:Compliance-ProductEnvironmental@Viasat.com)

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**REACH only:**

**ENVIRONMENTAL COMPLIANCE**

FINISHED PART TO BE ROHS AND REACH COMPLIANT PER EU DIRECTIVES 2011/65/EU AND EU REGULATION 1907/2006 AND SHALL NOT USE OZONE DEPLETING SUBSTANCES PER US REGULATORY REQUIREMENTS. FABRICATOR SHALL ADD A UNIQUE PERMANENT IDENTIFICATION MARK IN ACCORDANCE WITH E-QAPP PR000608 "FABRICATOR FACILITY MARKING". MATERIAL DECLARATIONS FOR ROHS AND REACH (SVHC'S) SHALL BE PROVIDED AND UPDATED AS NEEDED IN ACCORDANCE WITH THE REQUIREMENTS OF PR000608. REACH SVHC DECLARATION UPDATES SHALL BE FORWARDED TO: [Compliance-ProductEnvironmental@viasat.com](mailto:Compliance-ProductEnvironmental@viasat.com)

NOTE: AN ALTERNATE RoHS STATEMENT BELOW ON EXISTING DRAWINGS IS ACCEPTABLE MEETING REQUIREMENTS STATED ABOVE. IPC1752 REQUIREMENTS STATED BELOW IS SUPERSEDED BY MATERIAL DECLARATION REQUIREMENTS SPECIFIED IN THIS DOCUMENT.

**RoHS COMPLIANCE**

*FINISHED PART TO BE RoHS COMPLIANT PER DIRECTIVE 2002/95/EC. FABRICATOR MUST PROVIDE A RoHS MATERIAL DECLARATION FOR THIS FINISHED PART IAW IPC-1752 (MINIMUM OF CLASS 1). IF EQUIVALENT ALTERNATIVE RoHS COMPLIANT MATERIALS/COMPONENTS ARE USED, A LIST OF THESE ALTERNATIVES (AND THEIR RESPECTIVE MATERIAL DECLARATIONS) MUST BE PROVIDED WITH THE FINISHED PART MATERIAL DECLARATION. THIS FINISHED PART MAY BE SUBJECTED TO RoHS TESTING/AUDITING, AND FABRICATOR MUST BE ABLE TO PROVIDE SUPPORT DOCUMENTATION FOR THEIR MATERIAL DECLARATION WITHIN 1 WEEK IF REQUESTED. FABRICATOR TO ADD A UNIQUE PERMANENT FABRICATION FACILITY IDENTIFICATION MARK ON EACH FINISHED FABRICATED PART FOR RoHS TRACABILITY. THE MARK USED MUST BE IDENTIFIED ON THE MATERIAL DECLARATION.*

**Packaging Note** for Fabricated items or Spec item packaging;

**Packaging Compliance**

“FINISHED PACKAGING SHALL MEET REACH EU REGULATION 1907/2006, EU PACKAGING DIRECTIVE 94/62/EU, AND US TIPPA LAW, WHICH INCLUDES ELIMINATION AND VERIFICATION OF HEAVY METAL USAGE IN PACKAGING. PACKAGING SHALL NOT USE OZONE DEPLETING SUBSTANCES PER US REGULATORY REQUIREMENTS. ALL PACKAGING MATERIAL MUST BE RECYCLABLE OR REUSABLE AND MARKED WITH APPROPRIATE CORRESPONDING SYMBOL(S) COVERING EUROPEAN UNION AND US REGULATIONS. MATERIAL DECLARATIONS FOR REACH (SVHC'S) AND USE OF HEAVY METALS IN PACKAGING INCLUDING PRODUCT WEIGHT SHALL BE PROVIDED AND UPDATED AS NEEDED IN ACCORDANCE WITH THE REQUIREMENTS OF PR000608 AND FORM PR000634 (OR EQUIVALENT) WHICH CAN BE FOUND ON THE VIASAT.COM WEBSITE UNDER “SUPPLIER INFORMATION”. ALL PACKAGING MATERIAL DECLARATIONS FOR HEAVY METALS AND EU REACH, PLUS ANY SUBSEQUENT REQUIRED REGULATORY UPDATES SHALL BE FORWARDED TO: [Compliance-ProductEnvironmental@viasat.com](mailto:Compliance-ProductEnvironmental@viasat.com)”

13.2 Fabricated Item “Fabrication Facility” Marking

When specified on the drawing for RoHS or REACH compliance, the Fabrication vendor shall apply a Fabrication Facility mark. Viasat Mechanical Engineering may specify the facility mark location on the drawing, if not specified, then, it must be applied to the part in a discreet location typically not seen by a Viasat customer in an in-service condition. If the part is too small or it is not possible to permanently mark the part, then placing the facility mark on the packaging (Bag & Tag) is acceptable with Viasat QA or Compliance Management approval.

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This facility mark shall be approved by Viasat Inc. Quality Assurance or Compliance Management. If product is supplied by a sole source supplier, Viasat QA may deviate from this requirement. Any other deviation to this requirement must be approved by Viasat's Environmental Compliance Management.

#### **14 BATTERY REQUIREMENTS**

Batteries supplied to Viasat shall meet the requirements of Battery Directives 2006/66/EC. Viasat's Environmental Compliance team shall be notified of products shipped to or on Viasat's behalf that contain batteries. The best method of notification is an email to [Compliance-ProductEnvironmental@viasat.com](mailto:Compliance-ProductEnvironmental@viasat.com).

#### **Packaging, shipping documents, and product manuals must identify where batteries are installed or shipped with the product-**

- (a) All batteries installed in equipment must be protected from damage & short circuit and the equipment must be packaged to prevent accidental battery activation. The packaging marking is dependent upon the type of battery used in the product but must follow International Civil Aviation Organization (ICAO)'s *Technical Instructions for the Safe Transport of Dangerous Goods by Air* as set forth in the most recent version of the International Air Transport Association's (IATA) *Dangerous Goods Regulations* (UN38.3 or newer).
- (b) Batteries must be marked with the appropriate symbol and their capacity per requirements in 2006/66/EC.

#### **15 Paints**

Shall comply per Addendum 1 for substances including lead in paints cannot exceed 5 PPM and short chain paraffins in paints cannot exceed 300 PPM. Paint shall comply to applicable emission standards.

#### **16 Inks**

Shall comply per Addendum 1 for substances including heavy metals such as lead, mercury, and hexavalent chromium cannot exceed 100 PPM and cadmium cannot exceed 50 PPM. Short chain paraffins in inks cannot exceed 300 PPM.

#### **17 Weldment Material**

Shall comply with Addendum 1 including hexavalent chromium, lead, and mercury not to exceed a 1000 PPM and cadmium cannot exceed 100 ppm unless otherwise specified on the drawing or specification.

#### **18 Conversion Coatings for Metals**

Shall comply with Addendum 1 and/or shall meet the requirements specified on the Viasat drawing or specification or identified Viasat part number for specific conversion coating type which may reference either a MIL Specification or ASTM Standard.

#### **19 Specific Viasat Inc. Customer request**

On occasions Viasat's customers may request specific substance data outside the scope of this document. This special request for information may be to determine if materials/substances such as/ but not limited to magnesium, zinc, PVC, lithium batteries, selenium, or bromines used in flame retardants, etc. are used in the seller's product and the locations of these substances in the products. Viasat will make a formal request to the seller using a customized material declaration form such as PR001327 for this type of request. The Viasat product supplier has 10 business days to respond to specific substance request.

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## 20 References

### EU Documents

- Directive 2006/66/EC Battery Directive
- Directive 2002/95/EC EU RoHS Directive
- Directive 2002/19/EU EU WEEE Directive
- Directive 2012/19/EU EU WEEE Directive
- Directive 94/62/EC EU Packaging Directive
- Directive 1907/2006 EU REACH Regulation
- Directive 2011/65/EU EU RoHS 2 Directive
- REGULATION (EU) 2019/1021 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 June 2019 on persistent organic pollutants
- ECHA Biocidal Products Regulation (EU) No 528/2012 (BPR)
- Directive (EU) 2015/863 RoHS 3 - Addendum to Directive 2011/65/EU

### China Documents

- SJ/T11363-2006 “Requirements on Concentration Limits to Toxic and Hazardous substances in Electronic Information Products”
- SJ/T11364-2014 “Marking Requirement for Control of Pollution Caused by Electronic Information Product”

### Viasat Documents

- PR000450 – WEEE Marking Guidelines
- PR000512 – Quality Assurance Procurement Provisions (QAPP)
- PR000522 – Drawing Format, Mechanical Template
- PR000608 – Environmental Quality Assurance Procurement Provisions E-QAPP
- PR000634 – Environmental Declaration for Packaging Material Template
- PR000715 – Guide Regulatory Compliance Jurisdiction Matrix
- PR001158 – Environmental Guidelines for Packaging & Product Labeling
- PR001165 – REACH Data Collection Form
- PR001327 – Manufacturer’s Certificate of Specific Environmental Conformance
- PR002005 – RoHS Self-Certification for Manufacturer’s Process Materials
- PR002006 – REACH Self-Certification for Manufacturer’s Process Materials
- PR002344 – REACH/RoHS Compliance Supplier Training
- PR002412 – WEEE Analysis and Registration Process
- PR002413 – WEEE Product Registration Template
- PR002441 – NAS 411-1 Disclosure Form
- PR002603 – Full Material Disclosure (FMD) Supplier Form
- PR002666 – WHS Supplier Disclosure Form
- PR002754 – Full Material Disclosure (FMD) Supplier Form with SCIP
- # for Viasat form

### Other Documents

- IPC-1752A or IPC-175B XML format , and IPC-1754 – Material Declaration Management forms
  - IEC- International Electro technical Commission
-

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- International Air Transport Association's (IATA) *Dangerous Goods Regulations* (DGR)
- Compliance MAP- Viasat Excel Declaration Form
- MIL-STD-889C – Standard Practice – Dissimilar Metals
- Toxic Substances Control Act of 1976 (TSCA) of 1976

#### Definitions

- **ABS** – Acrylonitrile Butadiene Styrene
  - **CFC** – Chlorinated Fluorocarbons
  - **DBDPO** – Decabromodiphenyl Oxide (a flame retardant)
  - **ECHA** – **European Chemicals Agency** [European Chemicals Agency \(ECHA\)](#)
  - **EFUP or EPUP** – Environmentally Friendly Use Period as defined in China SJ/-T11364-2006,
  - **EU** – European Union
  - **Hazardous Material** – articles or substances which are capable of posing a risk to health, safety, property, or the environment
  - **HFC** – Halogenated Fluorocarbons
  - **HIPS** – High Impact Polystyrene
  - **Homogeneous Material** – A material that cannot be mechanically disjoined into different materials
  - **Known to be Present** –Deliberately used in the formulation of a product where its continued presence is desired to provide a specific characteristic, appearance, property, attribute or quality
  - **MCV** – Is the Maximum Concentration Value threshold of the substance that shall be accepted
  - **OBDPO** – Octabromodiphenyl Oxide (a flame retardant)
  - **ODS** – Ozone Depleting Substance
  - **Parts per Million (PPM)** – used to express concentration. The ppm is 1,000,000 x mass substance / mass of the homogeneous material. Concentrations are unit-less, for example 100 ppm = 0.01% = 100 mg/kg.
  - **PeBDPO** – Pentabromodiphenyl Oxide (a flame retardant)
  - **POPs** – Potential Organic Pollutants
  - **Product** – Any item of value sold to Viasat Inc.
  - **PVC** – Polyvinyl Chloride
  - **REACH** – **R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemical substances per EU regulation 1907/2006 E/C
  - **Restricted** – Allowed in limited quantities
  - **RoHS** – restriction of the use of certain hazardous substances in electrical and electronic equipment covered in EU Directive 2011/65 EU and subsequent addendums, China law SJ/-T11364-2006. RoHS Compliance limits and homogenous material examples are listed in Addendum 1& 2
  - **RSL** – Viasat Restricted Substances List
  - **Saleable Items** – Products sold by Viasat to customers or service providers, including but not limited to standard product lines, customized (“Special”) products, service/spare parts and materials
  - **SCIP** – **S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts)
  - **SDS** – Safety Data Sheet as defined in EU Regulation 1907/2006 E/C
  - **Seller** – A person or organization that sells products, parts, assemblies, or raw materials to Viasat Inc. (same as Supplier)
  - **Supplier** – A person or organization that sells products, parts, assemblies, or raw materials to Viasat Inc.
  - **Suppliers Material Declaration** – a declaration made by a Viasat Inc. supplier that the product purchased by Viasat Inc. complies with an established list of requirements and standards.
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- **SVHC** – Substance of Very High Concern as defined in EU Regulation 1907/2006 E/C
  - **TSCA** – Toxic Substances Control Act of 1976
  - **WEEE** – **W**aste **E**lectrical and **E**lectronic **E**quipment per European Union Directive 2012/19/EU
-

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**Addendum 1**

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## 1 Purpose

The purpose of the Viasat Restricted Substances List (RSL) is to identify substances that are controlled (“restricted”) by Viasat Inc. in order to comply with international regulations and Viasat policies to minimize the use of known or suspected hazardous substances. By requiring reporting on the presence of these substances in products purchased, Viasat will obtain the information necessary to ensure that all products are compliant with local, state and national law in the countries where they are sold. It is the goal of Viasat to eventually eliminate the use of all substances on the RSL.

The RSL will be used to inform Viasat employees, suppliers and other stakeholders about Viasat’s controlled substances and the associated compliance and declaration requirements. It will form an integral part of product specifications and contractual agreements with suppliers and customers.

## 2 Scope

This specification applies to parts that are supplied to Viasat and/or its affiliates and subsidiaries, parts manufactured by Viasat, and the final products Viasat delivers to its customers. It identifies materials and substances that are restricted or that require disclosure to Viasat if present in supplied parts and materials, including batteries and packaging materials.

The current version of the RSL is valid until next update is published.

### This specification contains:

- List of substances that are controlled by Viasat for all parts, products and associated packaging.
- Threshold levels for substances in parts, products and packaging, equal to or above which the quantity of the substance must be disclosed
- Viasat approved exemptions for the use of listed substances above the threshold levels in certain specific applications
- Requirements for substance disclosure information exchange
- Requirements for suppliers of parts and materials

### Where this document is called out, it applies to:

- All purchased raw materials, parts, components, subassemblies, assemblies, and packaging materials (herein collectively referred to as “parts”) that are used in the manufacture, repair, refurbishment and shipping of Viasat products.
- All suppliers of parts to Viasat and their sub-tier suppliers as those parts relate to Viasat end products
- Viasat designed and “off-the-shelf” parts
- All Viasat manufactured parts used in Viasat end products

### Limitations of scope:

- This specification defines only the Viasat requirements pertaining to regulated substances and is not a complete or comprehensive listing of all Viasat regulatory compliance requirements.
  - This specification does not apply to packaging materials and components (e.g. cardboard, plastic tray) if those items are not intended for use in shipping products out of Viasat facilities.
  - This specification does not apply to process chemicals (i.e. chemicals used and consumed during manufacture) unless those process chemicals constitute part of the finished part as delivered to Viasat (excepting biocidal agents).
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### 3 References

#### EU Documents

- Directive 2006/66/EC Battery Directive
- Directive 2002/95/EC EU RoHS Directive
- Directive 2002/19/EU EU WEEE Directive
- Directive 2012/19/EU EU WEEE Directive
- Directive 94/62/EC EU Packaging Directive
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- PR001158 – Environmental Guidelines for Packaging & Product Labeling
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- PR002005 – RoHS Self-Certification for Manufacturer’s Process Materials
- PR002006 – REACH Self-Certification for Manufacturer’s Process Materials
- PR002344 – REACH/RoHS Compliance Supplier Training
- PR002412 – WEEE Analysis and Registration Process
- PR002413 – WEEE Product Registration Template
- PR002441 – NAS 411-1 Disclosure Form
- PR002603 – Full Material Disclosure (FMD) Supplier Form
- PR002666 – WHS Supplier Disclosure Form
- PR002754 – Full Material Disclosure (FMD) Supplier Form with SCIP

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#### Other Documents

- IPC-1752A or IPC-175B XML format , and IPC-1754 – Material Declaration Management forms
  - IEC- International Electro technical Commission
  - International Air Transport Association’s (IATA) *Dangerous Goods Regulations* (DGR)
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- Compliance MAP- Viasat Excel Declaration Form
- MIL-STD-889C – Standard Practice – Dissimilar Metals
- Toxic Substances Control Act of 1976 (TSCA) of 1976

#### 4 Definitions/ Abbreviations

- **RSL** – Viasat Restricted Substances List.
- **Saleable Items** – Products sold by Viasat to customers or service providers, including but not limited to standard product lines, customized (“Special”) products, service/spare parts and materials.
- **Part** – The term part as used in this document refers to any part, component, sub-assembly, assembly, raw material, and/or packaging component sold to or manufactured by Viasat.
- **Product** – The term product as used in this document refers to any product offered for sale by Viasat Corporation.
- **Known to be Present** – Deliberately used in the formulation of a product where its continued presence is desired to provide a specific characteristic, appearance, property, attribute or quality.
- **Homogeneous Material** – A material that cannot, in principle, be mechanically disjointed into different materials. Examples of “homogeneous materials” are individual types of plastics, ceramics, glass, metals, alloys, paper, board, resins and coatings.
- **Mechanically Disjointed** – Is used to describe processes that can, in principle, be used to separate one material from another by mechanical actions such as: unscrewing, cutting, crushing, grinding and abrasive processes.
- **PPM – Parts per Million** – used to express the relative mass content of substances within materials and/or products.

#### 5 Viasat Restricted Substances

This section identifies the substances restricted by Viasat for use in raw materials, parts, components, subassemblies, assemblies, and/or packaging materials. The substance lists with their respective listing organizations are found in Appendix 1. These substance lists and the reporting thresholds may be changed by Viasat at any time and does not always indicate regulatory bans or restrictions as substance disclosure is required to support regulatory labeling and/or reporting as well as Viasat’s design for environment requirements. Suppliers of parts are expected to ensure that those parts comply with the requirements of the current version of the RSL at the time of delivery to Viasat.

All Viasat new product programs beginning on or after January 31, 2019 shall incorporate the RSL requirements. All Viasat products shall comply with the requirements of this RSL by July 31, 2019

Any and all requests for exceptions to compliance with the RSL shall be submitted to and approved by the Viasat Environmental Compliance Team at [Compliance-ProductEnvironment@viasat.com](mailto:Compliance-ProductEnvironment@viasat.com).

Restricted substances shall not be present above the listed threshold level in any part sold to or otherwise supplied to Viasat Corporation. It is the intention of Viasat to not use these substances unless no technologically feasible alternative exists. Therefore, these substances shall be identified for phase out and the supplier should detail their phase out plans as part of the reporting process. If a restricted substance is known to be present above the threshold level the quantity shall be reported.

#### 6 Conformance Requirements

Viasat Engineering, Supply Chain, Quality Assurance, and suppliers shall ensure that delivered parts and materials are compliant with this RSL, when called out by drawing, specification or purchasing documents. Compliance requires that the restricted substance content in the delivered part or material does not exceed the limits found using Appendix 1 or more up to date applicable regulations.

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## 6.1 Declaration Data Responsibility

### 6.1.1 Viasat Responsibilities

- Design Engineering shall provide restricted substance declaration data for each part before production release and verify that the part and the declaration meet the requirements of the RSL.
- Engineering shall review restricted substance compliance whenever a change is made and provide a new/updated substance declaration data as necessary.
- Supply Chain shall assist with contacting suppliers of parts and materials in order to collect the required declaration data.
- Incoming inspection shall collect and store declaration data for production parts and materials as directed in the inspection plan for each part.
- Viasat is responsible for conformance of sub-tier supplier provided parts when Viasat designates the sub-tier supplier.

### 6.1.2 Supplier Responsibilities

- Suppliers shall provide a completed Declaration of Hazardous Substances upon initial delivery of parts and throughout the production lifetime as required by Viasat.
- Suppliers shall review restricted substance compliance whenever a change is made and provide a new/updated declaration as necessary.
- Suppliers shall collect appropriate declaration data from their supply chain to substantiate the declarations made to Viasat.
- Suppliers are responsible for RSL conformance of parts from sub-tier suppliers when the supplier chooses the sub-tier. Evidence showing conformance of sub-tier parts and materials must be made available to Viasat upon request.

## 6.2 Restricted Substance Content Data

Restricted Substance compliance relies upon obtaining data on the restricted substance content of the parts and materials used in the end-product. Methodologies for determining restricted substance content vary depending on the part or material and may include:

- Data collection from suppliers
- Formulation analyses
- Use of Industry Standards for raw materials (e.g. metal alloys)
- Testing of actual part / material

The specific methodology used for obtaining restricted substance content data and converting this to a declaration of conformity should be documented within the restricted substance compliance system of the supplier making the declaration.

## 6.3 Restricted Substance Reporting

Every part used in each RSL compliant product shall have a completed material declaration.

A completed material declaration shall be submitted for a part at the following key events in the product life cycle:

- New/revised part release
  - Engineering changes
  - Any change to supplier or sub-tier supplier materials or processes
  - Non-conformances found
  - Updates of the RSL
-

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#### 6.4 Declaration Verification

The recipient of the material declaration shall verify the accuracy and reliability of the declaration through the use of appropriate evaluation, inspection, and test methods, and/or review of certified test reports. The process used to verify declaration data should be documented as part of the restricted substance compliance system.

Declarations need to be supported by appropriate objective evidence that the part complies with the restricted substance requirements. Verification is a review of the objective evidence which may include:

- Material / Supplier risk assessments
- Supplier qualifications
- Formulation analyses
- Test Reports

#### 6.5 Declaration Data Retention

Restricted substance declaration data shall be stored in accordance with the Viasat restricted substance data storage policy and retained for a period of not less than production life of the Viasat product(s) it is associated with, plus 10 years.

### 7 Supplier Controls and Records

#### 7.1 Process Controls

Suppliers are responsible for establishing and maintaining an effective Restricted Substance Compliance Assurance System. This system should contain the documented processes necessary to ensure conformance of parts delivered to Viasat, including: design and process controls, supply chain controls, compliance data collection and verification, self-audits, and record keeping.

Viasat will also conduct its own audits of suppliers' part level conformance and Compliance Assurance Systems.

#### 7.2 Frequency of Obtaining Compliance Data

Viasat expects suppliers to verify or re-verify conformance of their parts on a regular basis and at key events in the product life cycle.

#### 7.3 Data Verification

Suppliers are expected to verify the accuracy and reliability of the Declaration through the use of appropriate evaluation, inspection, and test methods, and/or review of certified test reports. The process used to verify declaration data should be documented as part of the restricted substance compliance system.

#### 7.4 Data Retention

Restricted substance declaration data shall be stored for a period of not less than 10 years, or as specified by contract. This data must be readily available upon request.

#### 7.5 Supplier Self-Audit

Suppliers are responsible to establish and implement a self-audit process to ensure they have an effective Compliance Assurance System in place that consistently produces RSL compliant parts for delivery to Viasat. Suppliers are responsible to ensure that any non-conformances are identified and analyzed and that appropriate root-cause and corrective actions are taken prior to any part being used in Viasat products.

### 8 Restricted Substance Use Exemptions

When a part cannot be produced without using a restricted substance, an exemption can be used for the specific applications defined in the appropriate directive. If and when an exemption is used, the exemption should be noted on the material declaration.

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## Appendix 1: Viasat Restricted Substance List (RSL)

Table 1: Viasat Restricted Substances

<b>Regulation</b>	<b>Updated List Location</b>	<b>Applicable Declarations</b>
RoHS (EC 2011/65/EU)	<a href="https://ec.europa.eu/environment/topics/waste-and-recycling/rohs-directive_en">https://ec.europa.eu/environment/topics/waste-and-recycling/rohs-directive_en</a>	PR002005, PR002344
REACH/SCIP (EC 1907/2006)	<a href="https://echa.europa.eu/candidate-list-table">https://echa.europa.eu/candidate-list-table</a>	PR001165, PR002006, PR002344, PR002603, PR002754
NAS 411	NAS 411-1	PR002441
POPs ([EU] No 2019/1021)	<a href="https://echa.europa.eu/list-of-substances-subject-to-pops-regulation">https://echa.europa.eu/list-of-substances-subject-to-pops-regulation</a>	
China RoHS		PR002005, PR002344
Biocides	<a href="https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr">https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr</a>	
WEEE	<a href="https://ec.europa.eu/environment/topics/waste-and-recycling/waste-electrical-and-electronic-equipment-weee_en">https://ec.europa.eu/environment/topics/waste-and-recycling/waste-electrical-and-electronic-equipment-weee_en</a>	PR000450, PR002412, PR002413
Australia Work Health and Safety	<a href="https://www.legislation.gov.au/Details/F2011L02664">https://www.legislation.gov.au/Details/F2011L02664</a> Tables 10.1, 10.2, and 10.3	
California Proposition 65	<a href="https://oehha.ca.gov/proposition-65/proposition-65-list">https://oehha.ca.gov/proposition-65/proposition-65-list</a>	
Ozone depleting substances	<a href="https://www.epa.gov/clean-air-act-overview/clean-air-act-title-vi-stratospheric-ozone-protection">https://www.epa.gov/clean-air-act-overview/clean-air-act-title-vi-stratospheric-ozone-protection</a>	
IAEG AD-DSL	<a href="https://www.iaeq.com/chemicalrpt/addsl/">https://www.iaeq.com/chemicalrpt/addsl/</a>	<a href="https://www.iaeq.com/chemicalrpt/adsrt/">https://www.iaeq.com/chemicalrpt/adsrt/</a>
Toxic Substances Control Act of 1976 (TSCA)	<a href="https://www.epa.gov/tsca-inventory/how-access-tsca-inventory#download">https://www.epa.gov/tsca-inventory/how-access-tsca-inventory#download</a>	