



DATE

REQUESTOR

RE: Microsoft Corporation Product Compliance

Dear Sir/Madam:

Microsoft is dedicated to being a good global citizen, with products and solutions that help improve people's lives around the world. At a minimum, we implement strict policies to ensure that our hardware products and packaging fully comply with the environmental requirements of each country in which we do business.

In pursuit of sustainability, we are committed to minimizing the impacts that our operations and product life cycles may have on the environment. For our software products, Microsoft promotes the use of compact discs (CDs) and Web-based downloads, and the use of online instructions when possible, to reduce the use of plastics and paper. We also restrict the use of toxic substances in the manufacture and packaging of our hardware and software products.

Recognizing that our direct actions are only part of the process, Microsoft requires that our global manufacturing partners and vendors follow applicable environmental laws and undertake sound environmental practices with respect to their facilities and the products they manufacture for us. In 2003, we began measures to require compliance with the applicable requirements of the European Union's Restriction of Hazardous Substances (RoHS) Directive (which went into effect on July 1, 2006).

Microsoft requires its suppliers, through our specifications, to conduct routine product material testing and to submit declarations of compliance with the EU RoHS Directive and other applicable requirements. Microsoft audits our suppliers and manufacturers to evaluate product and packaging compliance with our specifications through the use of independent and certified third-party test laboratories. Based on these measures, practices and our supplier's declarations of conformity, Microsoft considers our hardware products compliant with applicable laws and regulations worldwide; compliance with the RoHS Directive for all EU products was achieved before July 1, 2006. EU RoHS by definition does not apply to software products, packaging or optical media (CD-ROMs and DVDs).

In addition to compliance with EU RoHS, Microsoft Corporation products meet the chemical content requirements of China Management Methods for Controlling Pollution by Electronic Information Products (Ministry of Information Industry Order #39), but only those destined for the Chinese market meet the requirements for EPUP marking, hazardous substance table and packaging labeling. Microsoft will meet future requirements under MII Order #39 as they evolve.

European Directive No. 1907/2006 on the Registration, Evaluation and Authorization of Chemicals (REACH) entered into force on June 1, 2007. Under Article 33 of the Regulation, Microsoft recognizes its responsibility to notify ECHA (European Chemical Agency) if products contain any Substances of Very High Concern (SVHC) in a concentration above 0.1% and to provide the consumer with sufficient information to allow safe use of the products.



With respect to packaging, Microsoft designs its hardware and software packaging to reduce environmental impact. Through its policies and in close relationship with vendors, we use a system of specifications, testing and verification to comply with applicable laws and regulations, including requirements restricting the use of certain hazardous substances, specifying recyclable material content, and restricting the use of certain wood products. This includes compliance with the European Union's Directive on Packaging and Packaging Waste (94/62/EC of 20 December 1994, as amended by 2004/12/EC) and the CEN packaging standards (2005/C 44/13). Restricted substances include the following:

- Certain applications of arsenic and compounds
- Asbestos and asbestos materials
- Certain azo-based dyes and colorants
- Creosotes (tar oils)
- Brominated dioxins/furans & chlorinated dioxins/furans
- Cadmium and compounds
- Ozone depleting substances
- Certain short-chain chloroparaffins
- Hexavalent chromium and compounds
- Lead and compounds (allowed for electronic applications until July 2005)
- Mercury and mercury compounds
- Pentachlorophenol (PCP) and compounds
- Polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs) and oxides
- Polychlorinated biphenyls (PCBs) and polychlorinated terphenyls (PCTs)
- Radioactive materials
- Certain applications of organic tin compounds

We have attached Table A as an excerpt from Microsoft's Restricted Substance Specification for Hardware Products and Packaging (H00594), which indicates the limits established by Microsoft to our suppliers and manufacturers of restricted substances in Microsoft hardware products. We have also attached the limits on restricted substances in Microsoft's packaging materials for all of our products. Our Restricted Substance Control System Procedure (H00642) is the required methodology used by our suppliers and manufacturers to measure their adherence to H00594. If you would like a full copy of Specifications H00594 or H00642, I will be happy to send them to you upon your request.

Microsoft Corporation is also in compliance with the EU Waste Electronic and Electrical Equipment Directive's (2002/96/EC) labeling requirement as of August 13, 2005, and will meet its other requirements as applicable to Microsoft products under the various timeframes set by the Member States.

**Microsoft**

Additionally, if you have any questions regarding this letter, please contact me at +1 (425) 707-3620 or at [kennethj@microsoft.com](mailto:kennethj@microsoft.com).

Sincerely,



Dr. Kenneth V. B. Jennings  
Environmental Compliance Manager  
Entertainment and Devices Division  
Microsoft Corporation



**Table A: Restricted Substances**

| <b>Restricted Substance</b>  | <b>Legal &amp;/ or Regulatory Basis</b>  | <b>Restricted Applications</b>                | <b>Background Limit Weight % (PPM)</b>   |
|--|--|---|--|
| <b>Lead and lead compounds</b>   | <b>RoHS Directive (2002/95/EC) for electronic components and California Proposition 65 for external plastics/cables.</b> | <b>All Applications (See Note A1)</b>         | In PVC and Plastics:<br>0.0300 (300 PPM)<br><br>In all other materials:<br><u>(See Notes A1 &amp; A2 about RoHS exemptions)</u><br>0.1000 (1000 PPM)<br><br>See Microsoft Document H02446, Microsoft Approved Analytical Labs, for test method requirements for PVC and plastics |
| <b>Cadmium and cadmium compounds</b>                                       | <b>RoHS Directive (2002/95/EC) for electronic components</b>   | <b>All Applications (See Note A1)</b>         | 0.0100 (100 PPM)<br>See Microsoft Document H02446, Microsoft Approved Analytical Labs, for test method requirements for PVC and plastics   |
| <b>Mercury and mercury compounds</b>                                       | <b>RoHS Directive (2002/95/EC) for electronic components</b>   | <b>All Applications (See Note A1)</b>         | RoHS 0.1000 (1000 PPM)   |
| <b>Hexavalent chromium (chromium VI) and hexavalent chromium compounds</b> | <b>RoHS Directive (2002/95/EC)</b>   | <b>All Applications (See Notes A1 and A2)</b> | 0.1000 (1000 PPM)  |
| <b>Polybrominated biphenyls (PBB)s</b>                                     | <b>RoHS Directive (2002/95/EC)</b>   | <b>All Applications (See Note A1)</b>         | 0.1000 (1000 PPM)<br>Cumulative  |
| <b>Polybrominated diphenyl ethers (PBDEs)</b>                              | <b>RoHS Directive (2002/95/EC)</b>   | <b>All Applications (See Note A1)</b>         | 0.1000 (1000 PPM)<br>Cumulative  |
| <b>Deca-brominated diphenyl-ethers (deca-BDE)</b>                          | <b>RoHS Directive (2002/95/EC)</b>   | <b>All Applications (See Note A1)</b>         | 0.1000 (1000 PPM)<br>Cumulative  |
| <b>Asbestos and asbestos materials</b>                                     | <b>76/769/EEC (+91/659/EEC)</b>  | <b>All Applications</b>                       | 0.1000 (1000 PPM)  |
| <b>Azo-based dyes and colorants with carcinogenic amino compounds</b>      | <b>76/769/EEC</b>  | <b>All Applications</b>                       | 0.0030 (30 PPM)  |



| <b>Restricted Substance</b>   | <b>Legal &amp;/ or Regulatory Basis</b>  | <b>Restricted Applications</b>   | <b>Background Limit Weight % (PPM)</b> |
|---|--|--|--|
| <b>Brominated dioxins/furans, Chlorinated dioxins/furans</b>  | Microsoft policy   | All Applications   | 0.0000005 (5 PPB)                      |
| <b>Chloroparaffins with chain length 10-13 C atoms, chlorine content &gt; 50% by weight</b>   | 76/769/EEC   | All Applications   | 0.1000 (1000 PPM)                      |
| <b>Chlorofluorocarbons (CFCs), Hydrochlorofluorocarbons (HCFCs), Hydrofluorocarbons (HFCs), Halons and Ozone Depleting Substances</b> | Montreal Protocol, Japanese Law, US Clean Air Act, 76/769/EEC and amendments.  | All manufacturing operations, including but not limited to solvents, cleaning agents, compressed gas packages, refrigerants, foam plastics | NA                                     |
| <b>Polychlorinated Biphenyls (PCBs), Polychlorinated Terphenyls (PCTs)</b>  | 76/769/EEC and Japanese Law: (The Law concerning the Examination and Regulation of Manufacture etc. of Chemical Substances, class 1) | All Applications   | 0.0050 (50 PPM)                        |
| <b>Radioactive materials</b>  | Laws for the Regulation of Nuclear Source Material, Fuel Material, and Reactors 1986 (Japanese Law)                                  | All Applications   | NA                                     |
| <b>Tributyl tin (TBT) and, Triphenyl tin (TPT) compounds</b>  | Japanese Law: (The Law concerning the Examination and Regulation of Manufacture etc. of Chemical Substances, class 2)                | All Applications   | 0.0100 (100 PPM)                       |
| <b>Polycyclic Aromatic Hydrocarbon (PAH):</b>   | Central Experience Exchange Office   | External Applications in certain Products (See Note A3)  | 0.0001 (1 PPM)                         |



| Restricted Substance   | Legal &/ or Regulatory Basis  | Restricted Applications  | Background Limit Weight % (PPM)               |
|--|---|--|---|
| Benzo[a]pyrene   | (ZEK), Central Authority of Federal States for Safety (ZLS).<br>German committee "Technische Arbeitsmittel und Verbraucherprodukte (AtAV)<br>Document: ZEK 01-08                                    | All Other Applications   | 0.0020 (20 PPM)                               |
| 16 PAHs: Naphthalene, Acenaphthylene, Acenaphthene, Fluorene, Phenanthrene, Anthracene, Fluoranthene, Pyrene, Chrysene, Benzo[a]anthracene, Benzo[b]fluoranthene, Benzo[k]fluoranthene, Benzo[a]pyrene, Dibenzo[a,h]anthracene, Indeno[1,2,3-cd]pyrene, Benzo[ghi]perylene | Central Experience Exchange Office (ZEK), Central Authority of Federal States for Safety (ZLS).<br>German committee "Technische Arbeitsmittel und Verbraucherprodukte (AtAV)<br>Document: ZEK 01-08 | External Applications in certain Products<br>(See Note A3)   | 0.0010 (10 PPM)                               |
|  |   | All Other Applications   | 0.0200 (200 PPM)                              |
| Perfluorooctane sulfonates (PFOS)  | 2006/122/ECOF the 30 <sup>th</sup> amendment to 2006/769/EEC  | All Applications   | 0.1000 (1000 PPM)                             |
| Certain Phthalates: di(2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP)   | EU Phthalate Directive (Toys) (2005/84/EC)  | All internal and external Plasticized materials in certain toy products<br>(See Note A3 and See Note A4) | 0.1000 (1000 PPM)<br>Cumulative: Sum of three |
|  | CA Proposition 65: Safe Drinking Water and Toxic Enforcement Act of 1986  |  |   |
| Certain Phthalates: di-isononyl phthalate (DINP), di-isodecyl  | EU Phthalate Directive (Toys) (2005/84/EC)  | External plasticized materials in certain products   | 0.1000 (1000 PPM)<br>Cumulative: Sum of three |



| Restricted Substance   | Legal &/ or Regulatory Basis   | Restricted Applications  | Background Limit Weight % (PPM)                                     |
|--|--|--|---|
| phthalate (DIDP), di-n-octyl phthalate (DNOP)                                    | CA Proposition 65: Safe Drinking Water and Toxic Enforcement Act of 1986 | (See Note A3 and See Note A4)  |   |
| Certain Phthalates: Dimethoxyethyl phthalate (DMEP), Di-n-hexyl phthalate (DnHP) | CA Proposition 65: Safe Drinking Water and Toxic Enforcement Act of 1986 | External plasticized materials in certain products (See Note A3 and See Note A4) | 0.1000 (1000 PPM)<br>Cumulative: Sum                                |
| Antimony   | Toy Safety Directive (88/378/EEC)  | External Applications in certain Products (See Note A3)                          | Limit of element migration from toy materials:<br>0.0060 (60 PPM)   |
| Arsenic  | Toy Safety Directive (88/378/EEC)  | External Applications in certain Products (See Note A3)                          | Limit of element migration from toy materials:<br>0.0025 (25 PPM)   |
| Barium   | Toy Safety Directive (88/378/EEC)  | External Applications in certain Products (See Note A3)                          | Limit of element migration from toy materials:<br>0.1000 (1000 PPM) |
| Cadmium  | Toy Safety Directive (88/378/EEC)  | External Applications in certain Products (See Note A3)                          | Limit of element migration from toy materials:<br>0.0075 (75 PPM)   |
| Chromium   | Toy Safety Directive (88/378/EEC)  | External Applications in certain Products (See Note A3)                          | Limit of element migration from toy materials:<br>0.0060 (60 PPM)   |
| Lead   | Toy Safety Directive (88/378/EEC)  | External Applications in certain Products (See Note A3)                          | Limit of element migration from toy materials :<br>0.0090 (90 PPM)  |
| Mercury  | Toy Safety Directive (88/378/EEC)  | External Applications in certain Products (See Note A3)                          | Limit of element migration from toy materials :<br>0.0060 (60 PPM)  |
| Selenium   | Toy Safety Directive (88/378/EEC)  | External Applications in certain Products (See Note A3)                          | Limit of element migration from toy materials:<br>0.0500 (500 PPM)  |

## Notes

**A1) RoHS Substances:** These substances shall not be present above trace background levels in homogeneous materials used in Microsoft hardware products, except as permitted by exemptions allowed per EU Directive 2002/95/EC “Use of Certain Hazardous Substances



In Electrical and Electronic Equipment” (“RoHS Directive”). As of July 1, 2008 deca-BDE, is no longer an exempt application under EU RoHS, and is restricted in the same manner as other PBDEs.

- A2) Regarding test equipment manufactured for Microsoft:** Lead use is permitted in category 9 equipment (Monitoring and control instruments) due to their exclusion from the RoHS regulation, except for restrictions on lead use in PVC and plastics. Hexavalent chromium use is also permitted in category 9 equipment.
- A3)** The following is a list of Products and Accessories that Microsoft policy requires to comply with Toy Safety, EU Phthalate Directive testing and California Proposition 65. Microsoft may exercise its discretion to require that other products must comply with such testing requirements in addition to those outlined below
- a. Wired video game controllers
  - b. Wireless video game controllers
  - c. Racing game wheels
  - d. Wireless trivia game controllers
  - e. Instant Messaging (IM) Pad for connecting to video game controllers
- A4)** New headset and earphone products developed and introduced after the effective date of this specification revision, April 30, 2008 shall be phthalate free as feasible substitutes are available that meet our safety and performance requirements.
- a. Headsets
  - b. Earphones

### **General Content Restrictions – Packaging Materials**

The content restrictions specified in this section apply to the specified compound as a constituent in the restricted applications of any packaging parts, components, materials or products purchased by Microsoft.



| <b>Restricted Substance</b>   | <b>Appendix A Reference</b> | <b>Restricted Applications</b>           | <b>Background Limit Weight % (PPM)</b> |
|---|-----------------------------|--|--|
| <b>Lead and lead compounds</b>  | <b>Table A</b>              | <b>All Applications</b>                  | 0.0050 (50 PPM)                        |
| <b>Cadmium and cadmium compounds</b>  | <b>Table B</b>              | <b>All Applications</b>                  | 0.00005 (0.5 PPM)                      |
| <b>Sum of concentrations of Cadmium, Lead, Mercury and Hexavalent Chromium in a packaging component</b> | <b>Tables A,B,C,D</b>       | <b>All Applications</b>                  | 0.0100 (100 PPM)                       |
| <b>Asbestos and asbestos materials</b>  | <b>Table F</b>              | <b>All Applications</b>                  | 0.0100 (100 PPM)                       |
| <b>Polyvinyl Chloride (PVC)</b>   |                             | <b>All Applications</b>                  | Use is prohibited                      |
| <b>Mercury and mercury compounds</b>  | <b>Table C</b>              | <b>Organically Recoverable Materials</b> | 0.00005 (0.5 PPM)                      |
| <b>Arsenic</b>  |                             | <b>Organically Recoverable Materials</b> | 0.0005 (5 PPM)                         |
| <b>Chromium</b>   |                             | <b>Organically Recoverable Materials</b> | 0.0050 (50 PPM)                        |
| <b>Copper</b>   |                             | <b>Organically Recoverable Materials</b> | 0.0050 (50 PPM)                        |
| <b>Fluorine</b>   |                             | <b>Organically Recoverable Materials</b> | 0.0100 (1000 PPM)                      |
| <b>Molybdenum</b>   |                             | <b>Organically Recoverable Materials</b> | 0.0001 (1 PPM)                         |
| <b>Nickel</b>   |                             | <b>Organically Recoverable Materials</b> | 0.0025 (25 PPM)                        |
| <b>Selenium</b>   |                             | <b>Organically Recoverable Materials</b> | 0.000075 (0.75 PPM)                    |
| <b>Zinc</b>   |                             | <b>Organically Recoverable Materials</b> | 0.0150 (150 PPM)                       |
| <b>Creosote</b>   |                             | <b>Wood Materials</b>                    | Use is prohibited                      |
| <b>Arsenic CCA</b>  |                             | <b>Wood Materials</b>                    | Use is prohibited                      |

Optical media, CD-ROM and DVD, are not regulated as either packaging or hardware.