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RoHS, REACH and WEEE Policy

In line with its [Environmental Policy](#) and its Positive Retail Roadmap¹, VusionGroup products comply with the EU REACH Regulation², the EU RoHS Directive³, and the WEEE directive⁴. These are intended:

- To reduce and restrict substances that are potentially harmful to humans or the environment
- To regulate the management of waste arising from electrical and electronic equipment to reduce their environmental impact and promote recycling

Under the **EU REACH Regulation**, all chemicals manufactured in the EU or imported into the EU market must be registered if the annual volume used exceeds 1 metric ton. VusionGroup ensures that all its products fully comply with this chemical control policy by delivering the necessary information to the EU Agency ECHA⁵.

The **EU RoHS Directive** stipulates that electrical and electronic products sold in the EU market may not contain lead, cadmium, mercury, Hexavalent chromium, polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs) and other controlled substances (including phthalates DEHP/BBP/DBP/DIBP). The EU RoHS Directive thus seeks to limit the impact and exposure of consumers and the environment to specific hazardous substances. It also reduces occupational exposure during the manufacturing, recycling, or disposal of products or equipment. In line with this directive, the IoT technology of VusionGroup has always been eco-designed with authorized substances. The Group's ESLs⁶ are designed to be repaired, disassembled, and recycled. They are 100% refurbishable: the plastic used is recyclable, the batteries are replaceable, the casings parts are reusable, and the glueless assembly allows for easy recycling. Everything placed on the market is also energy efficient: the Group is constantly striving to reduce its energy consumption and redesign its IoT solutions so that they can, eventually, run without a battery.

The **WEEE Regulation** complements the previous requirements by aiming to reduce electronic waste generation, promote recycling, ensure proper handling and treatment of hazardous materials,

¹ This sets out VusionGroup's commitment to protect the environment by achieving a low-waste, low-carbon and sustainable digital transformation of the retail sector.

² REACH: Regulation for Registration, Evaluation, Authorization and Restriction of Chemicals (EU chemical control policy)

³ RoHS: Restriction of the Use of Hazardous Substances in Electrical and Electronic Equipment

⁴ WEEE: Waste Electrical and Electronic Equipment

⁵ ECHA: European Chemical Agency

⁶ ESL: Electronic Shelf Labels

and set targets for waste collection. The regulation also develops the extended producer responsibility, according to which producers can be made responsible for financing or organizing the prevention and the management of waste from these end-of-life products. VusionGroup assumes its responsibilities for the end-of-life of its products by financially supporting several eco-organisms across Europe. Additionally, the Group, aware of the importance of proactive environmental action, has created the Second Life Program in 2019 to refurbish ESLs. Indeed, in an ESL: more than 80% of the battery, 100% of the easylock mechanism, up to 99% of the casing can be recycled. Since the creation of the Program, more than 7 million ESLs have been refurbished.

In conclusion, VusionGroup requires that all parts, components and raw materials provided by suppliers and used in the production of the Group's IoTs are RoHS and REACH compliant and respect the WEEE regulation throughout their lifecycle. This commitment is not only about legal compliance but also about meeting customer expectations and reducing environmental impact.