



Product Safety and Compliance

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Introduction

There is growing public awareness of product safety after the outbreak of a number of major incidents relating to hazardous substances found in toys and other products. The governments in many countries have also tightened the corresponding product safety regulations. It is therefore very important that companies supply products that are safe to use and comply with those regulations.

Print-Rite is dedicated to supply products that are safe to use and environmentally friendly throughout their life cycles. We are a pioneer in implementing green quality and product safety management, commencing with the ISO14001 certification in 2000. All our products are RoHS compliant and also satisfy the requirements under the EU REACH regulations and those under the US Consumer Product Safety Improvement Act of 2008. Our manufacturing site is also the World's First manufacturer in printer consumables industry to certify to IECQ QC080000.

By selecting Print-Rite products, customers can be assured that no hazardous substances are being used in production and they can avoid the risk of breaching the relevant regulations on product safety.



Our Product Safety Statement

- We are committed to providing our customers with products that are safe to use and environmentally friendly throughout their life cycles
- We endeavor to comply with product safety regulations of all countries that our products are delivered
- We support our customers to comply with regulations on product safety by providing necessary information and documents for compliance with the regulations in their countries



Operational Assurance on Product Safety

Product development stage

- We target for zero waste in our product design and development process
- We include product safety compliance in our product development stages by specifying the use of REACH & RoHS compliant materials
- We also implemented green procurement management with strict monitoring and control of our supplies source

Manufacturing

- Our manufacturing processes are carefully designed and configured to ensure zero contamination from our manufacturing wastes to the environment
- We recycle water, energy and materials to reduce the waste produced
- We invest heavily in treatment facilities to treat the waste water and toner produced during production to ensure zero contamination to the environment and minimize health hazard to our workers



Waste Toner Treatment



Waste Water Treatment



Operational Assurance on Product Safety

QA Audit

- Our Quality Assurance Audit entails incoming, process, outgoing and final QA to ensure that our products meets all customer specifications and Product Safety requirements before delivery to customers

Monitoring & Record

- Enterprise Quality Portal with Early Warning system in place to assist management to manage the process and prepare preventive action for possible deviations
- Regular audit and monitoring conducted by corporate Quality Systems Audit Team

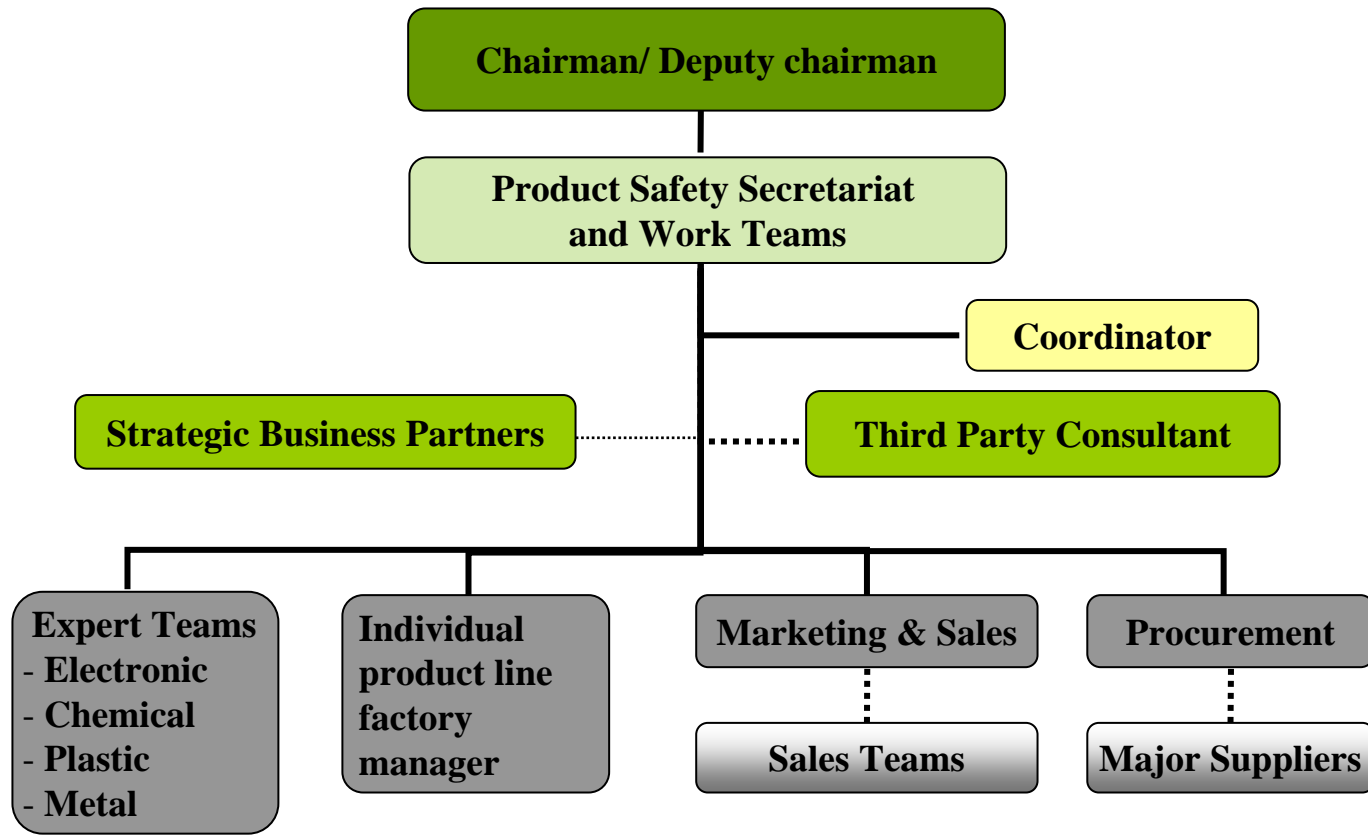
Continuous Improvement

- We emphasis on continuous improvement, working teams and committees are formed to formulate strategic improvement projects



Product Safety Management Committee

Our Product Safety Committee is formed with cross-functional representatives and team of experts. The Committee will release policies and guidelines for all business entities and keep top management alert to changes of product safety requirements.



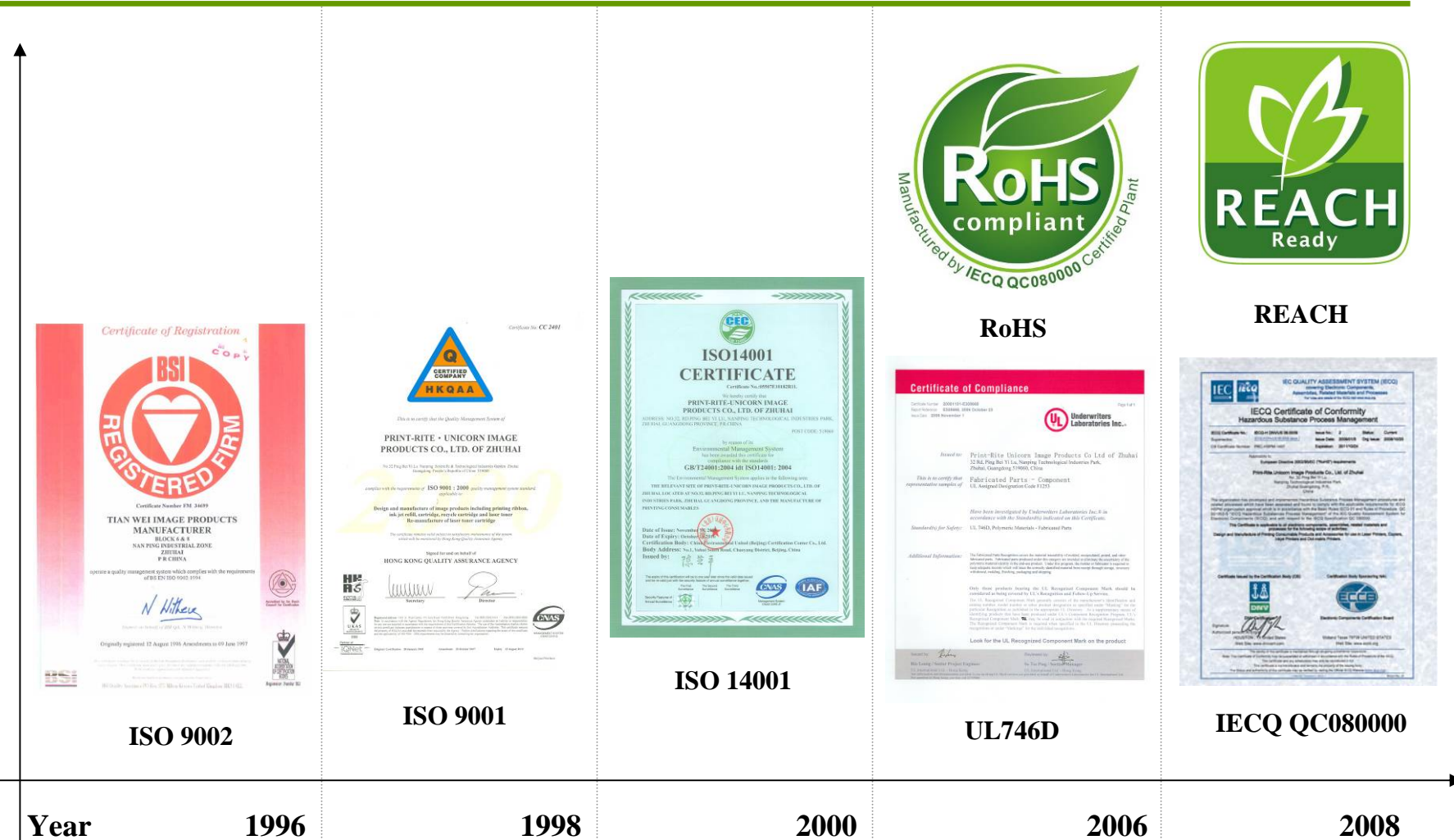
Product Safety Management Committee

- Invite major customers to act as advisor to our Safety Committee's operation
- Understand our customers' requirement and align with their goals and objectives
- Work with our vendors to comply with necessary directives and regulations
- Periodic Review and Continuous Improvement
- Total Supply Chain Synchronization



Product Safety Management Milestone

Print-Rite is a pioneer in quality and product safety management



ISO 9002



ISO 9001



ISO 14001



UL746D



RoHS



IECQ QC080000



REACH

Product Safety Management Milestone

We support our customers to prepare and obtain accreditations and green product labels

MSDS	AMES	Green-Mark	Nordic Swan	Blue Angel
Material Safety Data Sheet	Tests for genotoxicity, carcinogenicity & reproductive toxicity	Product safety/ environmental policy	-Reman toner cartridge -Control harmful substances $\geq 75\%$ recycled parts	Product safety/ environmental policy $\geq 75\%$ recycled parts



IECQ QC080000 Certification



What is IECQ QC080000 Certification?

- IECQ QC080000 is the specification requirement for implementation of IECQ HSPM (Hazardous Substance Process Management) system certification issued by the IEC (International Electrotechnical Commission) in October 2005, based on the EIA/ECCB Standard 954 Electrical and Electronic Components and Products Hazardous Substance Free Standard and Requirements
- IECQ QC080000 provides the framework for the comprehensive, systematic and transparent management and control of processes pursuant to Hazardous Substance Free (HSF) products and production processes



Print-Rite Certified to IECQ QC080000

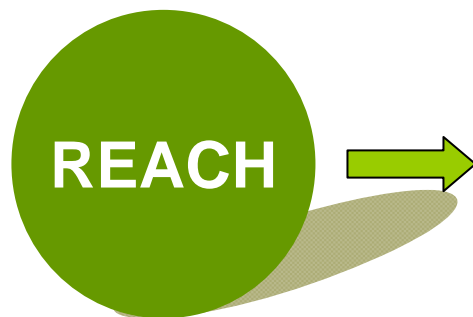
- Print-Rite is the World's First manufacturer in printer consumables industry to receive IECQ QC080000 certification
- An organization that has been certified to IECQ QC080000 can demonstrate that it has established an effective management system to control and manage hazardous substances in order to comply with the requirements of EU RoHS, REACH and other relevant product safety regulations



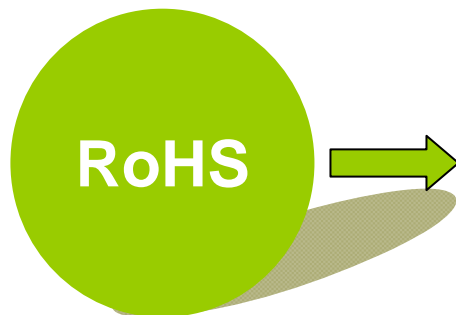
EU REACH & RoHS Compliance



EU REACH & RoHS Compliance



REACH is a new European Union regulation concerning the **R**egistration, **E**valuation, **A**uthorization and restriction of **C**hemicals (**REACH**). The regulation came into force on 1st June 2007



The European Union publicized and enforced the Directive on the **R**estriction of the Use of Certain **H**azardous **S**ubstances in Electrical and Electronic Equipment (**RoHS**) on 13th Feb 2003 and 1st July 2006 respectively

REACH Compliance



What is REACH?

- REACH is a new European Union regulation concerning the Registration, Evaluation, Authorization and restriction of CHemicals. The regulation was publicized on 30th Dec 2006 and came into force on 1st June 2007
- According to REACH, EU manufacturers or importers are required to register substances they produce or import in quantities over 1 tonne per year
- The registration requirement applies to substances on their own, in preparations and in articles under special conditions (intentional release). Failure to register means that the substance cannot be manufactured, imported or used in the EU market
- Quantities of 10 tonnes or more per year additionally require the submission of a Chemical Safety Report (CSR) to document the safety assessment of the substance



REACH Timeline

30th December	REACH was publicized
1st June 2007	REACH entered into force
1st June 2008	European Chemicals Agency (ECHA) under REACH entered into operation. It acts as the central point in the REACH system.
1st December 2008	Deadline for Pre-registration. Pre-registered can benefit from extended registration deadlines (2010, 2013 or 2018) depending on the produced or imported annual volume of substances.
1st December 2010	Deadline for registration of chemicals of very high concern and substances produced or imported in high volumes (above 1,000 tonnes per year).
1st June 2013	Deadline for registration of chemicals produced or imported in quantities between 100 and 1,000 tonnes per year.
1st June 2018	Deadline for registration of low volume chemicals between 1 and 100 tonnes per year.



Registration Item

Substance	Preparation	Article
<p>A chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition</p>	<p>Mixture or solution of two or more substances</p>	<p>An object which during production is given a specific shape, surface or design, which determines its function to a larger degree than its chemical composition</p>
<p>Eg. individual pigments, solvent chemicals, etc</p>	<p>Eg. mixture of pigments & solvents, ink, toner</p>	<p>Eg. battery, ink cartridge, toner cartridge</p>

Substance of Very High Concern

European Chemicals Agency publicized the Candidate List of 15 Substances of Very High Concern (SVHC) on October 28th, 2008.

SVHC			
CRM Carcinogenic, Mutagenic or toxic to Reproduction	PBT Persistent, Bioaccumulative and Toxic	vPvB Very Persistent and very Bioaccumulative	Identified, on a case-by- case basis, from scientific evidence as causing probable serious effects to human health or the environment of an equivalent level of concern as those above
According to the criteria for classification in category 1 or 2 in accordance with Directive 67/548/EEC	According to the criteria in Annex XIII of the REACH Regulation	According to the criteria in Annex XIII of the REACH Regulation	Eg. Endocrine disruptors



Who has Registration Obligations?

- EU manufacturers and importers of substances on their own or in preparation
- EU producers and importers of articles meeting the criteria of Article
- Only representative (OR) established in the EU and appointed by a manufacturer, formulator or article producer established outside the EU to fulfill the registration obligation of importers



What has Print-Rite done for REACH Compliance?

(1) Pre-registration Completed before deadline

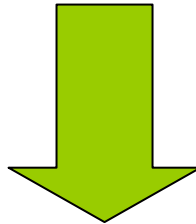
- We have put in place an Only Representative (OR) in EU to handle the pre-registration of substances. To comply with REACH regulations, we have recorded our customers (EU importers) as a Downstream User of our OR. The substances do not need to be registered again by our customers
- We have completed the pre-registration via appointed Only Representative for all substances contained in our ink, ribbon and toner which are classified as preparation under REACH that may exceed the tonnage threshold of registration for substances imported into the EU market
- We have a full plan for carrying out registration for substances in phases according to our assessment of export quantities or to seek suppliers who have fulfilled the registration requirement
- We will closely monitor the latest development of REACH and continue to fulfill the requirements



What has Print-Rite done for REACH Compliance?

(2) Confirmation of SVHC Clearance

European Chemicals Agency publicized the Candidate List of 15 Substances of Very High Concern (SVHC) on October 28th, 2008



We confirmed that **NO substance** on the Candidate List of SVHC publicized by EU in Oct 2008 is used or intentionally added in our products under REACH regulations



What has Print-Rite done for REACH Compliance?

(3) Continuous Support to Customers

We support our customers to meet their product safety compliance requirements

- Official notice to customers on the appointment of Only Representative (OR) and confirmation that NO substance on the Candidate List of SVHC is used or intentionally added in our products
- Provision of other specific information and data requested by customers

MAYBERRY TECHNOLOGY LTD
Registered Office: Amber Drive, Langley Mill, Nottinghamshire, United Kingdom NG16 4EE
Company No: 4448938
Email: print@print-rite.com

Ref: MITE-OR-LA-UTI
24 November 2008

Dear Sir / Madam,

Subject: **Compliance with the REACH Regulation
(Substances of Very High Concern)**

With reference to the ECHA Press Release: ECHA/PR/06/38 dated 28 October 2008, ECHA has included 15 substances in the Candidate List of Substances of Very High Concern (SVHC) for authorisation.

We, on behalf of the PRC manufacturing site of Union Technology International (m.c.a.) I.A.E. confirm that based on the information available, no substance on the Candidate List of Substances of Very High Concern is used or intentionally added in our products.

In the very unlikely event that our products contain substances on the Candidate List in a concentration above 0.1% (w/w), we will provide sufficient information, available to us, to our customers and on request to consumers within 45 days of the receipt of this request.

We will keep your company (as our downstream user) posted on the necessary information in the future according to our obligations under the REACH Regulation.

If you need to inquire about our REACH compliance or to update your contact information, please send your email to print@print-rite.com

Yours sincerely,

Annie Kong
REACH coordinator
(This is a computer generated document, no signature required)

Encl.: ECHA Press Release Ref: ECHA/PR/06/38 REV Helsinki, 28 October 2008 & November 2008 (Revised text in **Highlight**)

Your reliable great business partner

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RoHS Compliance



What is RoHS?

- The European Union publicized and enforced the Directive on the **R**estriction of the Use of Certain **H**azardous **S**ubstances in Electrical and Electronic Equipment (**RoHS**) on 13th Feb 2003 and 1st July 2006 respectively
- The RoHS Directive restricts the use of six hazardous substances:

Substance	RoHS LIMIT: MCV - Maximum Concentration Values
1. Cadmium (Cd)	< 0.01% = < 100 PPM
2. Mercury (Hg)	< 0.10% = < 1,000PPM
3. Hexavalent Chromium (Cr ⁶⁺)	< 0.10% = < 1,000PPM
4. Lead (Pb)	< 0.10% = < 1000 PPM
5. Polybrominated Byphenyls (PBB)	< 0.10% = < 1,000PPM
6. Polybrominated Diphenyl Ethers (PBDE)	< 0.10% = < 1,000PPM



What is RoHS?

The RoHS Directives' scope of coverage includes:

Categories of Electrical & Electronic Equipment Affected	Examples
Household appliances	Refrigerators, washing machines, microwaves, air conditioners ,vacuum cleaners, irons, hair dryers
IT and telecommunications equipment	Mainframes, personal computing, facsimile, telephone
Consumer equipment	Radio, television, Hi-Fi
Lighting equipment	CFLs, flow pressure sodium lamps
Electrical and electronic tools	Drills, saws, sewing machine
Toys, leisure & sports equipment	Electric trains or car racing sets, hand-held video game consoles
Automatic dispensers	Automatic dispenser for hot or cold bottles or cans



What has Print-Rite done for RoHS Compliance?

- It is not clearly defined whether printer cartridges fall under RoHS governance in the directive. Opinions of professional organizations are also divided. However, due to increasing public awareness of product safety, many customers require RoHS compliance from aftermarket printer cartridges suppliers
- All materials used in our production have been RoHS compliant since 1 January 2006. Print-Rite is also one of the first printer cartridge manufacturers in the world to certify to IECQ QC080000
- By buying RoHS compliant products, customers can be assured that the products are safe to use and do not contain those hazardous materials in excess of the restricted limits and they can avoid the risk of breaching the relevant regulations on product safety



THANK YOU

