


DOCUMENT NUMBER: QMS101773	TITLE: <b>Environmental Compliance Policy and Process</b>	
REVISION: A DCO# DCO005001	DOCUMENT CLASSIFICATION: 01-Business Policies and Processes	

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**1 PURPOSE**

This document sets the basic policy of the corporate Environmental Compliance group of **Brooks Automation US, LLC**.

**2 SCOPE**


- 2.1 Environmental Compliance acts as a subject matter expert who defines the Environmental Compliance policy of the company.
- 2.2 Defines how environmental compliance data is stored in Agile, the corporate PLM system.
- 2.3 Defines the compliance strategy that best balances the needs of compliance with available resources
- 2.4 Produces compliance evaluations, and responds to environmental compliance questions for customers.
- 2.5 Conducts compliance reviews and maintains compliance statistics.

**3 REFERENCE DOCUMENTS, FORMS**

<b>External Document References</b> (If applicable)	
<b>Document Number</b>	<b>Document/Form Name</b>
ISO140001	Environmental Compliance Management Standard

<b>Internal Document References</b> (If applicable)	
<b>Document Number</b>	<b>Document/Form Name</b>
147301	Engineering Standard that defines for our vendors the substances that are banned, restricted and reportable
QMS101774	Environmental Compliance Business Process

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#### 4 DEFINITIONS

List definitions of terms or abbreviations	
Term	Definition
CMRT	Conflict minerals response template
CRT	Cobalt response template
RCOI	Reasonable country of origin inquiry

#### 5 RESPONSIBILITIES

List all the participating roles and summarize their responsibilities related to the procedure	
Role	Responsibility

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**6 GENERAL**

- 6.1 Environmental Compliance shall act as a subject matter expert for the company on what substances are present in Brooks products.
- 6.2 Environmental Compliance shall provide the following services:
  - 6.2.1 Work to promote and nurture a culture of compliance.
  - 6.2.2 In consultation with the advisory board, review the department’s weaknesses and opportunities to determine a rolling action plan.
  - 6.2.3 In consultation with the advisory board, define what compliance evidence is to be collected based on what products the parts go into and the risk of non-compliance of the commodity the part belongs to.
  - 6.2.4 In consultation with advisory board and Sales, define what legislation shall be enforced, and communicate it to the vendor base with Engineering Standard 147301.
  - 6.2.5 Coordinate with Document Control on providing the correct structure and maintenance of compliance data in Agile
  - 6.2.6 Coordinate with the Supply Chain to define what parts in Agile shall have their compliance and lifecycle status maintained based on active BOMs, and which vendors shall be part of the conflict minerals RCOI.
  - 6.2.7 Environmental Compliance shall conduct and RCOI annually and provide CMRT and CRTs for customers
  - 6.2.8 Environmental Compliance shall select compliance contractors as required to perform tasks that are outside of the bandwidth of Environmental Compliance.
  - 6.2.9 Environmental Compliance shall provide the Advisory board with quarterly updates, including KPIs, and solicit their guidance on how the department is to pursue its mission.
  - 6.2.10 Environmental Compliance shall provide customers with compliance declarations for active BOMs (either Pre-prod or Production lifecycle, and actively sold) on request.

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6.3 Compliance strategy

6.3.1 Based on the input of sales and the advisory board, the following legislation shall be enforced:

- 6.3.1.1 EU RoHS, China RoHS
- 6.3.1.2 EU REACH Candidate list
- 6.3.1.3 EU REACH Annex XVII Restrictions
- 6.3.1.4 CAProp65
- 6.3.1.5 US EPA TSCA
- 6.3.1.6 Dodd-Frank act, specifically the responsible sourcing of minerals
  - 6.3.1.6.1 Covered metals: cobalt, gold, tantalum, tin and tungsten.
  - 6.3.1.6.2 An annual RCOI shall be performed to determine the sources of the preceding metals.
- 6.3.1.7 Waste Framework directive
  - 6.3.1.7.1 Brooks products with active sales will be uploaded as flat BOMS (only those parts containing SVHCs) to the SCIP database

6.3.2 Compliance requirements are communicated to the vendor with Engineering Standard 147301.

6.3.3 Compliance of the parts is to be managed based on the risk and type of part.

- 6.3.3.1 Compliance shall be confirmed by one of the following methods:
  - 6.3.3.1.1 Commercial parts, purchased by description:
  - 6.3.3.1.2 Commercial parts, purchased by MPN: either full material disclosure or with an acceptable compliance declaration.
  - 6.3.3.1.3 Custom parts: verify that the engineering standard is on the part drawing.

6.3.4 Compliance declarations shall be provided on customer request for products that are either Pre-prod or Production life cycle

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