



# Compliance Pack

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## 1. Introduction

Deep Sea Electronics Ltd (DSE) is committed to quality, OH&S and the environment. DSE are continually striving to meet and exceed customer expectations of our products and support services. We conduct our affairs by complying with all applicable laws and regulations but always look to go that extra step, with a philosophy that is focussed on integrity, transparency, compliance and responsible operations.

DSE are accredited to ISO9001:2015 Quality Standard, ISO14001:2015 Environmental Standard and ISO 45001 Health and Safety Standard. We are audited by an external body, NQA Ltd. The certificates of accreditations are available on the [DSE website](#).

Our Integrated Management System (IMS) incorporates the ISO9001:2015 Quality Standard, ISO14001:2015 Environmental Standard and ISO 45001 Health and Safety Standard. The implementation and execution of the IMS is the direct responsibility of the Senior Management Team (SMT). The Quality Health & Safety Systems manager is responsible for monitoring the day to day IMS activities, with assistance from the Compliance/Health and Safety officers for all related activities.

DSE is committed to conducting business in a socially responsible, ethical, and sustainable manner. We recognise our responsibility to contribute positively to society, protect the environment, and support the wellbeing of our employees, customers, and the wider community. We realise that our social, environmental and ethical conduct has an impact on our reputation, therefore the SMT takes overall responsibility to ensure our commitments are met. This also falls under the heading of Environmental, Social, Governance (ESG) operations of the company. We have various policies, procedures and processes in place, that align with our business strategy and values.

# Supplier Code of Conduct

DSE expects our suppliers and partners to avoid activities that may create any conflict between DSE interests and their own interests. Several areas, where conflict may occur, are covered below.



## Supplier Code of Conduct

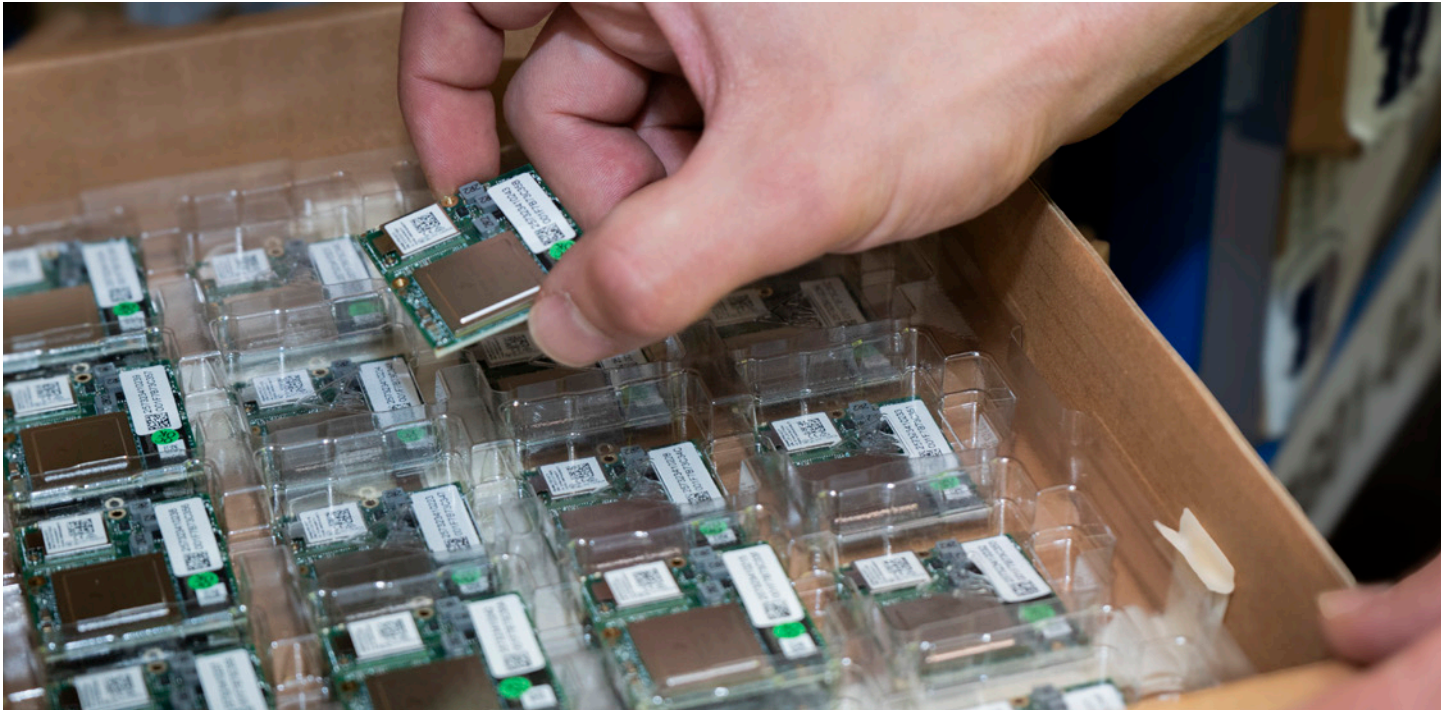
DSE have in place a code of conduct for suppliers which outlines our position on key governance areas and provides guidance to support our suppliers/partners in maintaining the highest standards of ethical and legal conduct that we expect of ourselves. It is important that what we do and how we do it reflects the values that DSE as a company stand for. We integrate our supplier code of conduct through training and policy communications, ensuring we are all informed to make the right decisions. Our suppliers are an integral part of our business and DSE work with them to create strong business relationships that are about more than merely the supply of products or services. Our supplier code of conduct is available on our [website](#).

## Modern Slavery Statement

DSE follow fair and ethical recruiting practices to ensure potential employees are supported and protected.

Employees are provided with a respectful workplace that is free from harassment, discrimination, and corruption, and where employees know they can speak up if they ever witness such misconduct. DSE provide fair working conditions and conform to responsible payment practices.

DSE will not engage with organisations which facilitate any form of slavery including the use of child labour or forced labour, or which do not recognise freedom of association or collective bargaining. We require that the suppliers and third-parties we work with should hold their own suppliers and third parties to the same standards. We publish an annual Modern Slavery statement which is available on our [website](#).



## Prohibited Substances

Product safety is a concern for all manufacturing companies and DSE is no different in complying with all laws and regulations for its products. Certain substances are prohibited for use in electronic products by legislation, such as but not limited to, Restriction of Hazardous Substances (RoHS) and Registration, Evaluation and Authorisation of Chemicals (REACH) as well as other local regulations around the world. DSE products are designed and manufactured to take account of all necessary safety regulations

## REACH Directive

The European regulation No1907/2006 “REACH”(Registration, Evaluation and Authorisation of Chemicals),came into force on 1st June 2007. It aims at regulating the use of chemical substances within the European Union, especially those Substances of Very High Concern (SVHC’s). REACH is focused on the production and use of chemical substances, and their potential impacts on human health and the environment. It is the strictest law to date regarding chemical substances, and it affects industries worldwide. REACH requirements that are typically updated by the European Chemical Agency on a semi-annual basis. An important objective of these regulations is to encourage, and in certain situations, ensure chemicals of high concern are replaced with less dangerous chemicals or eliminated. A major element of the REACH regulation is the requirement to communicate information on chemical content up and down the supply chain. We are committed to meeting our legal obligations under REACH, In order to comply with the REACH Regulation DSE have put into place processes and procedures to ensure implementation and compliance with the regulation especially the assessment of the presence of SVHC’s and communication along the supply chain to both suppliers and customers. The DSE REACH declaration is available on our [website](#).

## RoHS Directive

The RoHS (Restriction of Hazardous Substances) Directive 2002/95/EC came into force on 1st July 2006 and restricts the use of certain hazardous substances in electronic and electrical equipment within the European Market. From 1st July 2006 any new electronic or electrical equipment sold in the EC must not contain these hazardous substances in excess of the permitted levels indicated above. However, the directive does allow provision for some specific exclusions such as lead in glass and ceramics etc. Equipment used for military and medical purposes, together with monitoring and control instrumentation, are also exempt. The RoHS 2 directive (2011/65/EU) became law in July 2011 and took effect in January 2013.

The RoHS 2 directive was introduced to cover equipment not covered in the original Directive. New exemptions were added in Annex IV (cat 8/9) and self-certification added for conformity assessment (CE marking for finished products). The RoHS directive (2015/863) became law on the 22nd July 2019.

DSE products conform to the European Union “Restrictions on the use of Certain Hazardous Substances in Electrical and Electronic Equipment” Directive, 2011/65/EU as well as amendment 2015/863/EU (RoHS3). The DSE RoHS declaration is available on our [website](#).





## Toxic Substances Control Act (TSCA)

The Toxic Substances Control Act of 1976 gives the U.S. Environmental Protection Agency (EPA) authority to regulate chemicals that may pose risks to human health or the environment. TSCA applies to chemical substances manufactured, imported, processed, or distributed in commerce, including standalone chemicals, mixtures, and chemicals within articles. The Toxic Substances Control Act (TSCA) restricts the manufacture, import, use, and distribution of certain hazardous chemicals in the U.S., including PCBs, asbestos, lead based paint, and specific persistent, bioaccumulative, and toxic substances.

Section 6 of the Toxic Substances Control Act (TSCA), the responsible Environmental Protection Agency (EPA) issued final regulations on January 6, 2021, under 40 CFR Part 751 Subpart E to ban or restrict the following five persistent, bioaccumulative, and toxic (PBT) substances:

- Phenol, isopropyl phosphate (3:1) (PIP (3:1)) (CAS 68937-41-7)
- Decabromodiphenyl ether (DecaBDE) (CAS 1163-19-5)
- 2,4,6-Tris(tert-butyl)phenol (2,4,6 TTBP) (CAS 732-26-3)
- Hexachlorobutadiene (HCBd) (CAS 87-68-3)
- Pentachlorothiophenol (PCTP) (CAS 133-49-3)

DSE products, conform to the Section 6 of the Toxic Substances Control Act (TSCA). The DSE TSCA declaration is available on our [website](#).

## The Persistent Organic Pollutants (POPs) Regulation

The Persistent Organic Pollutants (POPs) Regulation establishes substance restrictions and waste management requirements for POPs and products containing POPs in the European Union. The regulation aims to protect the environment and human health by ensuring the phasing out of substances subject to the Stockholm Convention and Protocol to the 1979 Convention on Long-range Transboundary Air Pollution. It covers POPs on their own, in mixtures or in physical products and includes exemptions for certain substances used in laboratory research or incidental presence. The regulation is underpinned by the precautionary principle and aims to eliminate the manufacturing, placing on the market, and use of intentionally manufactured POPs.

The Annexes I to IV list the regulated substances:

- Annex I: Prohibited substances with specific exemptions
- Annex II: Restrictions (no entries)
- Annex III: Release reductions provisions
- Annex IV: Waste management provisions

DSE products, conform to POP regulations. The DSE POPs declaration is available on our [website](#).





## California Proposition 65

Proposition 65 also known as the Safe Drinking Water and Toxic Enforcement Act of 1986 was enacted in California in 1986 to protect the state's drinking water sources from contamination by harmful chemicals.

Effective August 31, 2018, the State of California requires customer notification of products manufactured after August 31, 2018 which contain substances listed in the Proposition 65 (Prop 65) substance list, in amounts exceeding Significant Risk Levels/ Dosage levels, which are known in the state of California to cause cancer, or birth defects, or reproductive harm. This requirement applies to consumer products sold in California, or products which may be exposed to people in the State of California.

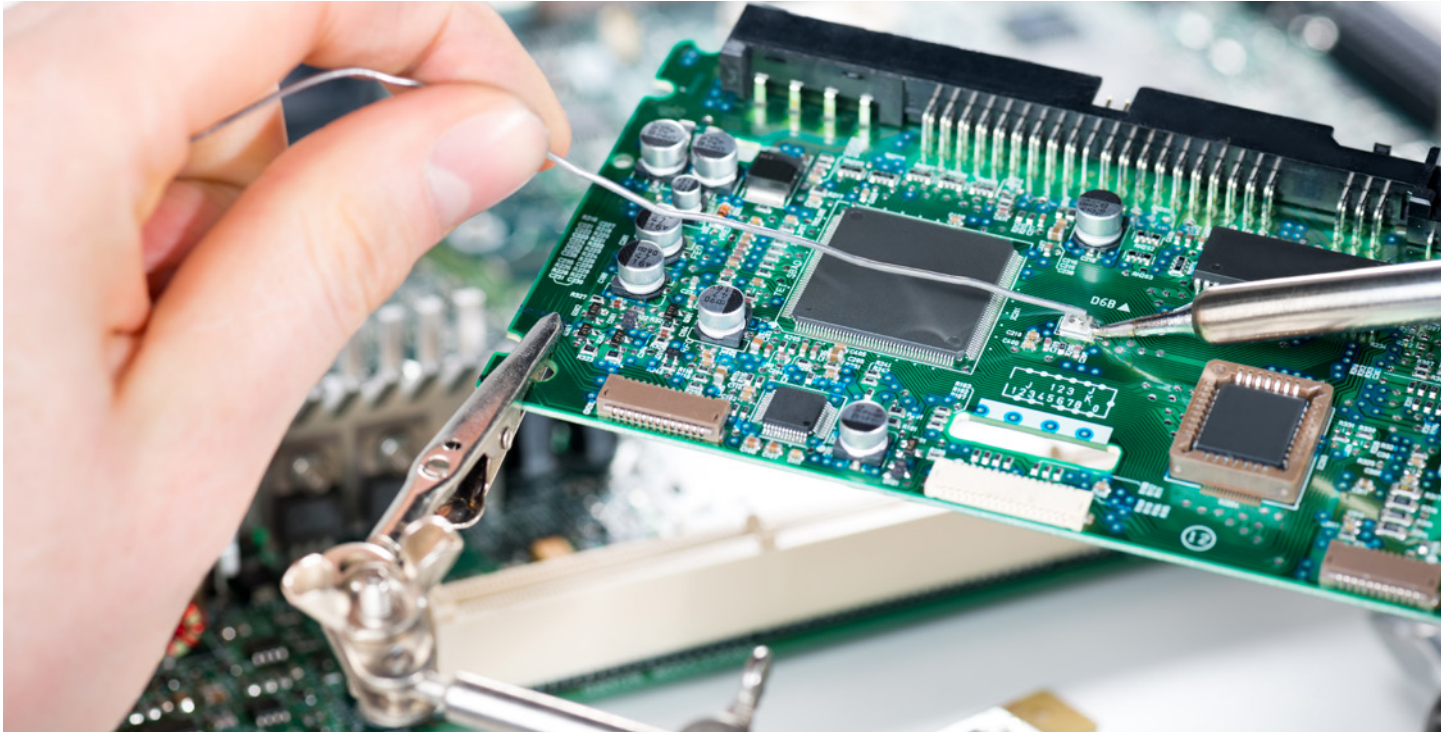
DSE products do not expose any person to any chemical on the Prop 65 list during normal product use. As with any electronic products, DSE products should be responsibly recycled at the end of life. DSE offer a WEEE takeback scheme. This allows the end user to return end of life units for responsible recycling by DSE, or alternatively, customers should follow local recycling options. The DSE Prop 65 declaration is available on our [website](#).

## PFAS (per-and polyfluoroalkyl substances)

In 2025 the Environmental Protection Agency (EPA) established new regulations regarding PFAS, particularly focusing on drinking water standards, state level bans and compliance requirements. Key point includes maximum contaminant levels (MCLs). The EPA has set legally enforceable MCLs for six PFAS compounds. Some PFAS are already subject to (non-exhaustive list):

- Regulation (EU) 2019/1021 on persistent organic pollutants (POP),
- Regulation (EC) No 1907/2006 (REACH)
- Toxic Substance Control Act (TSCA)

DSE products conform to PFAS regulations. DSE PFAS declaration is available on our [website](#).



## Conflict Minerals

In August 2012, the US Securities and Exchange commission (SEC) approved the Dodd-Frank Wall Street Reform and Consumer Protection Act to require companies to publicly disclose their use of conflict minerals that originate in the Democratic Republic of Congo(DRC)or an adjoining country.DSE is required to trace the supply of certain minerals, Gold, Tin, Tungsten and Titanium, (3TG), known as conflict minerals, as a supplier to USA companies.

DSE conduct an ongoing process of gathering information from suppliers to ensure that the minerals used in our products originate from outside the conflict region, or if the origin is within the conflict region, that the smelters or mines have been certified as conflict free.This requires that all suppliers to DSE must similarly trace the origin, to smelter level, of conflict minerals used in manufactured parts for reporting purposes. As DSE does not purchase directly from the smelters or mines but from intermediaries, however, we are forced to rely on the source information which we receive from our suppliers.DSE have access to a database that compiles information on components in the marketplace but also send out an annual CMRT request form to all suppliers. Data from the suppliers is collated into the CMRT and an annual report compiled to supply to companies requesting the information.

## Resource Conservation/Waste Reduction

In a global market, it is our collective responsibility to protect the environment and comply with all applicable environmental laws, regulations and standards. DSE is very aware of its responsibilities and operates a comprehensive waste management programme to ensure maximum recycling of materials such as paper, cardboard and plastics. DSE is a member of a national Waste Electronic and Electrical Equipment (WEEE) Compliance scheme (Member Ref. No. WEEE/BE0052TQ) and registered as a 'Small User' (member Ref. No. BPRN 07019) under the UK batteries Directive.

DSE also complies with regular reporting under the UK Energy Savings and Opportunities Scheme (ESOS) and the Streamlined Energy and Carbon Reporting (SECR) Scheme, to the UK Protocol for Greenhouse Gas Emissions Scope 1, 2 & 3, both of which highlight opportunities for improvements in energy usage.

## History of Change

Issue number / Date		Details of change
1	Issue 01 March 2026	New Document
2		
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