RoHS and REACH Declaration of Conformity (DoC)
Seagate Hard Disc Drives sold to Elitegroup Computer Systems Co. Ltd.

The European Union Restriction of Hazardous Substances (RoHS) Directive 2002/95/EC restricts the presence of the following chemical substances in electronic products effective July 2006:

- Lead (Pb)
- Cadmium (Cd)
- Hexavalent Chromium (Cr6+)
- Mercury (Hg)
- Polybrominated Biphenyls (PBB) and
- Polybrominated Diphenyl Ether (PBDE)

To the best of our knowledge Seagate hard disc drives comply with EU RoHS Directive 2002/95/EC as well as RoHS "Recast" Directive 2011/65/EU requirements and the amended exemption list per Commission Decision 2010/571/EU.

A number of parts and materials in Seagate products are procured from external suppliers. We rely on the representations of our suppliers regarding the presence of RoHS substances in these parts and materials. Our supplier contracts require compliance with our chemical substance restrictions, and our suppliers document their compliance with our requirements by providing material content declarations for all parts and materials for Seagate products. Current supplier declarations include disclosure of the inclusion of any RoHS-regulated substance in such parts or materials.

Seagate also has internal systems in place to ensure ongoing compliance with the RoHS Directive and all laws and regulations which restrict chemical content in electronic products. These systems include standard operating procedures that ensure that restricted substances are not utilized in our manufacturing operations, laboratory analytical validation testing, and an internal auditing process to ensure that all standard operating procedures are complied with.

The Seagate hard disk drive products, in addition to meeting the RoHS directive, also meet the EU REACH directive stipulations, since the REACH Directive inception on June 1, 2007. This statement includes every substance of very high concern (SVHC) listed by ECHA as of the date of this document.

Beginning in 2009, certain families of hard disc drives became available in Low Halogen configurations. Low Halogen configurations limit chlorine and bromine in homogeneous materials to 900 ppm (parts per million) each, 1500 ppm total (Cl plus Br). If your company requires a Low Halogen product, please consult with your sales or customer quality representative.

Seagate hard disc drives also comply with applicable provisions of "China RoHS" (Administration on Control of Pollution by Electronic Information Products), since its inception on March 1, 2007. Seagate labels disc drives with the appropriate EFUP, and a table denoting use of lead exceeding 1000 ppm, is included in product literature.

Applicable Exemptions to RoHS Directive

The EU Parliament has released Commission Decision 2010/571/EU dated September 24, 2010 which amends the Annex of 2002/95/EC. With reference to this amended Annex, Seagate does not use Exemption 7(c) -III or any other exemption with expiration dates listed in the Annex.

Seagate disc drives rely on the following RoHS Directive Exemptions for compliance:

Exemption Description
(Exemptions are listed per Annex released September 24, 2010)
6a. Lead as an alloying element in steel containing up to 0.35% lead by weight
6b. Lead as an alloying element in aluminum up to 0.4% lead by weight
6c. Lead as an alloying element in copper containing up to 4% lead by weight
7a. Lead in high melting temperature type solders (i.e. lead-based solder alloys containing 85 % by weight or more lead)
7(c)-I Electrical and electronic components containing lead in a glass or ceramic other than dielectric ceramic in capacitors (e.g. piezoelectronic devices) or in a glass or ceramic matrix compound

The above exemption list corresponds to the original exemption list provided below for convenience.

Exemption Description
(Exemptions applied before September 24, 2010)
5. Lead in glass of cathode ray tubes, electronic components and fluorescent tubes
6a. Lead as an alloying element in steel containing up to 0.35% lead by weight
6b. Lead as an alloying element in aluminum up to 0.4% lead by weight
6c. Lead as an alloying element in copper containing up to 4% lead by weight
7a. Lead in high melting temperature type solders (i.e. lead-based solder alloys containing 85 % by weight or more lead)
7c. Lead in electronic ceramic parts (e.g. piezoelectronic devices)

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April 3, 2012