

March 31, 2021

Dear Supplier:

Panasonic Corporation  
Quality & Environmental Division  
Global Procurement Company  
Procurement Planning Center

**Request to respond to the rules to prohibit PBT (Persistent, Bioaccumulative, and Toxic)  
Chemicals under the U.S. TSCA (Toxic Substances Control Act)**

Thank you very much for your unwavering support to Panasonic's initiatives for green procurement.

On Jan. 6, 2021, under the U.S. TSCA, the rules to prohibit 5 substances, i.e. decaBDE, PIP(3:1)\*, 2,4,6-TTBT, PCTP, and HCBD, and components/products containing these substances was promulgated.

Of the 5 substances subjective to this rules, PIP(3:1) is a chemical substance widely used as flame-retardant plasticizer in cables made of PVC (Polyvinyl Chloride), etc. for electrical and electronic equipment.

The prohibition of commercial distribution of PIP (3:1), and components/products containing PIP(3:1) in the U.S. was originally planned to enter into force from March 9, 2021. However, on March 8, 2021, the U.S. Environmental Protection Agency (EPA) announced that it would determine the effective date after:

- a temporary 180-day "No Action Assurance" (until Sep. 4, 2021), and
- a 60-day public comment period on these final rules including other 4 substances (until May 17, 2021),

as a result of lobbying by industrial groups including electrical industry.

Although the effective date has been postponed for the time being, the prohibition may enter into force after 6 months at the earliest. In such case, we probably need to ask each supplier to take necessary actions to be completed by the effective date in a short time. Therefore, Panasonic has decided to start substituting PIP (3:1)-free components/products, without waiting for EPA's announcement of new effective date.

Consequently, we would like to request each supplier to take necessary actions as stated below.

Note that regarding four PBT substances except PIP(3:1), decaBDE has been prohibited according to the "Chemical Substance Management Rank Guidelines Version 12.1", and we deem risk of containing the remaining three PBT substances in our electrical and electronic equipment very low.

\* PIP(3:1): Phenol isopropylated phosphate (3:1) , CAS RN® 68937-41-7

Requests to suppliers

- (1) If you have any component/product containing PIP(3:1), please inform us of it.
- (2) To the supplier that we know its components/products containing PIP(3:1) are delivered to Panasonic, we may individually consult with you regarding the submission of information on the components/products containing PIP(3:1) such as chemSHERPA data, and Non-use warranty, as well as the provision of substitute components/products. In such case, please respond to it accordingly.

For your information, PIP(3:1) may be used in the following resin components/products as retardant plasticizer:

- PVC resin: Harnesses, Electric wires, Cables, Covers of electronic components (Fuse covers, Sockets, etc.)
- Urethane resin: Electromagnetic wave absorption sheets.
- Other resin: Adhesives, Adhesive tapes, and Greases.

Note: Use of PIP(3:1) in 'Adhesives and Encapsulates' will be prohibited from Jan. 7, 2025, while use of PIP(3:1) in 'Lubricants and Greases' and in 'new components and replacement parts for automobiles and aerospace equipment' are exempted from the rules. However, in order to respond to other requirements specified in the rules such as 'Recordkeeping' and 'Downstream notification', we may consult with you regarding the submission of information on the components/products containing PIP(3:1). In such case, please respond to it accordingly.

- (3) Panasonic plans to issue an updated version of the "Chemical Substance Management Rank Guidelines Version (for Products)" where trends of chemical substance regulations in and outside of Japan including this rules are reflected, in fall. In updating the Rank Guidelines, please understand there is a possibility that PIP(3:1) is included in the category of the Level 1 Prohibited Substances (use of the substance must be immediately stopped), not firstly including it in the category of Level 2 Prohibited Substances (use of a substitute for the substance must be proceeded based on the requirements in the specified period), or Level 3 Prohibited Substances (issues for substitution of the substance must be clarified, and at the same time, timing of introducing the prohibition as Panasonic group must be discussed.)

End