



2025

Microsoft Product Compliance with Global Environmental Requirements

Microsoft's mission is to empower every person and every organization on the planet to achieve more. It pushes us to create technologies that positively impact people, communities, and organizations. To that end, Microsoft implements strict policies to ensure that our products and packaging fully comply with global environmental requirements. Recognizing that our direct actions are only part of the process, Microsoft also requires our global manufacturing suppliers to meet applicable environmental laws and regulations and implement sound environmental practices with respect to their facilities and the products they manufacture and supply to Microsoft. We are pleased to confirm that Microsoft products are designed and manufactured to comply with the following international laws and regulations as enacted and revised:

Global RoHS Compliance

All Microsoft hardware¹ products are designed to comply with applicable substance restrictions established by the European Union's Restriction of the use of certain Hazardous Substances in Electrical and Electronic Equipment (RoHS) Directive (2011/65/EC), as amended, including Directive (EU) 2015/863 which added four phthalates to the Annex II substance restriction list. The RoHS Directive requires self-declaration to RoHS substance restrictions through the Declaration of Conformity (DoC) process and CE marking. European DoCs are available at this [link](#).

With the United Kingdom's exit from the European Union on January 31, 2020, the UK has published transitional arrangements for RoHS regulatory compliance and marking. The UK RoHS regulations mirror the EU RoHS substance restrictions but require a specific UKCA marking and Declaration of Conformity (DoC) that cites the relevant UK regulations. United Kingdom DoCs are available at this [link](#).

By designing Microsoft hardware products to meet RoHS requirements, Microsoft also achieves compliance with other countries' laws that duplicate the RoHS Directive's substance restrictions for a similar scope of covered products, including, but not limited to, China Management Methods for Controlling Pollution by Electronic Information Products, Korea Enforcement Ordinance on the Recycling of Electrical and Electronic Equipment and Vehicles Act 2007, Taiwan RoHS Regulation, Japan's Law for Promotion of Effective Utilization of Resources, California's Electronic Waste Recycling Act, EAEU Technical Regulation 037/2016 (EAEU RoHS), United Arab Emirates (UAE) Restriction of Hazardous Substances (RoHS) Regulation and UK RoHS.

EU REACH Compliance

The European Union's Regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) (2006/1907/EC) entered into force on June 1, 2007. Pursuant to Article 33, Microsoft communicates information regarding Substances of Very High Concern (SVHC) that are contained in articles

¹ Please note: EU RoHS, by definition, does not apply to Microsoft software products, packaging or optical media (CD-ROMs and DVDs) unless supplied on a USB stick.



in a concentration above 0.1% by weight to its customers and to consumers upon request. To meet these compliance obligations, Microsoft actively monitors the European Chemical Agency (ECHA) SVHC candidate list and restricts SVHCs that have been added to the ECHA authorization list. Please see the Microsoft REACH declaration found on our [Materials and Substances web page](#) for Microsoft REACH compliance documentation, including the Substances of Concern in Products (SCIP) database² obligations which went into effect on January 5, 2021.

Battery Compliance

Microsoft products are designed and manufactured to comply with global battery marking, substance restriction, consumer information, transportation and recycling requirements, including those mandated by the EU Battery Regulation EU 2023/1542. To properly dispose of batteries, please consult Microsoft's [battery recycling](#) website. Battery transportation requirements for Microsoft products containing lithium ion batteries, including the UN 38.3 Test Summary, can be found on Microsoft's [battery compliance website](#).

Packaging Compliance

Microsoft designs its hardware and software packaging to meet global environmental requirements. Microsoft suppliers are required to comply with applicable laws and regulations, including the European Union's Directive on Packaging and Packaging Waste (1994/62/EC), as amended; CEN packaging standards (EN 13427:2005); and US Toxics in Packaging legislation. Microsoft product packaging is manufactured to meet heavy metal restrictions, labelling, and requirements regarding packaging optimization, manufacturing, composition, recovery and reuse. As an original signatory of the Australian Packaging Covenant (APCO), Microsoft has reduced the environmental impact of packaging through improvements in packaging design, recyclability, and packaging stewardship. Microsoft's Annual Report and Action Plan, found on our [packaging compliance](#) website, shows our performance against the APCO Packaging Sustainability Framework and our public commitment to advancing packaging sustainability.

Hardware Recycling

Microsoft has joined product collection and recycling schemes to comply with global electronics, packaging and battery recycling laws, including the EU Waste Electronic and Electrical Equipment (WEEE) Directive (2012/19/EU), as amended, and other electronics recycling laws in Asia, Latin America and North America. Compliance includes fulfilling recycling obligations and meeting information and labeling requirements for covered Microsoft products. To identify a location to properly dispose of Microsoft hardware devices, please consult the [recycling](#) website.

US Consumer Product Safety Improvement Act/EU Safety of Toys (Directive 2009/48/EC)

Enacted in August 2008, the US Consumer Product Safety Improvement Act of 2008 (CPSIA) limits the use of lead and certain phthalates in children's products. Although our devices are not classified as children's products, Microsoft designs its Xbox video game consoles and Xbox accessories to meet CPSIA substance

² SCIP is the database for information on Substances of Concern In articles as such or in complex objects (Products) established under the Waste Framework Directive (WFD).



restriction requirements due to their potential use by children. Microsoft also designs its Xbox video game consoles and Xbox accessories to meet EU Toy Safety Directive (2009/48/EC) substance restrictions.

Toxic Substance Control Act, PBTs U.S. Environmental Protection Agency

The Toxic Substances Control Act (TSCA) [issued five final rules on January 6, 2021](#), to reduce exposures to certain chemicals that are considered persistent, bioaccumulative and toxic (PBT). The five substances included: Decabromodiphenyl ether (DecaBDE); Phenol, isopropylated phosphate (3:1) (PIP (3:1)); 2,4,6-Tris(tert-butyl)phenol (2,4,6-TTBP); Hexachlorobutadiene (HCBD); and Pentachlorothiophenol (PCTP). For each substance, [risk management actions](#) were identified along with transition timelines. Microsoft products conform to all risk management actions identified for these five substances.

California Proposition 65

Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in November 1986. The Proposition was intended by its authors to protect California citizens and the State's drinking water sources from chemicals known to cause cancer, birth defects or other reproductive harm, and to inform citizens about exposures to such chemicals. Based on our product design and our supplier material disclosures, we have determined that Microsoft products do not contain chemicals in amounts that would trigger a notification or warning under Proposition 65.

Ozone Depleting Substances (ODSs)

The Montreal Protocol on Substances that Deplete the Ozone Layer ("Montreal Protocol") restricts the use of ODSs in manufacturing. Sections 4681 and 4682 of the US Internal Revenue Code (IRC) impose an excise tax on the sale or use of ODSs. Any importation of ODSs or products containing ODSs are subject to the IRS excise tax. To ensure compliance, Microsoft has prohibited the use of ODSs in the manufacture of Microsoft devices. Microsoft uses a three-pronged approach to enforce this prohibition: (1) Microsoft's restricted substance [specification](#), H00594, that all suppliers must meet, (2) an annual supplier disclosure covering ODSs, and (3) supplier audits to validate supplier ODS claims.

PFAS Compliance

Per- and Polyfluoroalkyl Substances (PFAS) are a large family of synthetic chemicals that include over 10,000 individual chemicals. Due to the presence of carbon-fluorine bonds which are one of the strongest chemical bonds known in nature, these chemicals are persistent in the environment. Some are also known to cause adverse effects on human health. Sub-groups of PFAS such as perfluorooctanoic acid (PFOA), perfluorooctanesulfonic acid (PFOS), long chain (C9-C14) perfluorocarboxylic acids (PFCA) and perfluorohexanesulfonic acid (PFHxS) have been restricted by chemical regulations around the world. Microsoft products are designed to meet all existing PFAS regulatory requirements, including, but not limited to:

- EU REACH (2006/1907/EC) restriction on C9-C14 PFCAs, their salts and related substances



- EU Persistent Organic Pollutants (POPs) Regulation (2019/1021) restriction on PFOA and PFOS
- Switzerland Ordinance on the Reduction of Risks relating to the Use of Certain Particularly Dangerous Substances restriction on C9-C14 PFCAs and PFHxS

Microsoft is aware of the proposed and enacted regulations targeting the restriction of all PFAS in various jurisdictions, notably including the proposed universal PFAS restriction under Annex XVII of the EU REACH Regulation, published on February 7, 2023. Microsoft is committed to complying with all PFAS regulatory requirements within the prescribed timeline.

Energy Efficiency

Microsoft devices are designed to comply with applicable local, national, and international energy regulations, including, but are not limited to:

- The EU Ecodesign Directive for Energy Related Products (2009/125/EC),
- US Department of Energy and US state energy conservation standards, and
- Other applicable international energy regulations.

Microsoft products are also designed to meet many applicable voluntary energy efficiency initiatives. For more information, please see our [Energy efficiency | Microsoft Legal](#) website. Additional information may be found through the [Product environmental and safety documents | Microsoft Legal](#).

If you have any questions on the environmental compliance status of Microsoft devices, please contact askept@microsoft.com.

Cintia Lederer

Director of Compliance