



Implementation of REACH Regulation (EC) No. 1907/2006 and other chemical law guidelines in the respectively valid version

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1. REACH Regulation

The abbreviation "**REACH**" is a combination of the initial letters "**R**egistration", "**E**valuation", "**A**uthorisation" and Restriction of "**C**hemicals". This is the most comprehensive body of legislation ever passed at EU level.

Hirschmann Automotive GmbH is certified according to ISO 9001, IATF 16949, ISO 45001 and ISO 14001 in their current versions. Hirschmann Automotive GmbH has a defined system for the introduction and administration of new chemical agents.

Hirschmann Automotive GmbH is affected by the REACH regulation in the form of two actors.

On the one hand, Hirschmann Automotive GmbH imports substances into the EU and thus obtains the status of an importer. As an importer, there was a fundamental obligation to register substances with a quantity of more than 1 ton/year, depending on the annual quantity, by 1 June 2018 at the latest.

The analysis of the chemical agents and the identification of the country from which the substances are obtained showed that **no substance > 1 ton/year is imported from outside the EU. This meant that there was no obligation to pre-register and subsequently no obligation to re-register.**



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Hirschmann Automotive GmbH assumes the role of a "downstream user" for substances purchased from the EU. Here, the obligation is assumed to check whether the actual intended use is stated in the safety data sheet. If the actual purpose of use does not correspond to the purpose stated in the safety data sheet, the supplier will be notified. The inclusion of the notified use usually leads to a new issue of the safety data sheet (according to REACH Regulation Part IV, Article 31). If a supplier does not wish to include the notified use, a notification is made to the Finnish Chemicals Agency.

2. Annex XIV of the REACH Regulation (candidate list for substances subject to authorization)

Annex XIV of the REACH Regulation is a list of "**Substances of Very High Concern**".

Annex XIV of the REACH Regulation is therefore also referred to as the "**SVHC**" list".

Furthermore, this list is also referred to as the "**ECHA** candidate list". It is the official organ for the announcement of candidates for substances with alarming properties and is updated twice a year.

At the time of this statement, our products do not contain any substances above 0.1 % by mass (0.01% for cadmium) listed in the "Candidate List of Substances of Very High Concern (Annex XIV, ECHA Candidate List, SVHC)".

Documented checks for every relevant change of law guideline are anchored in our management system and thereby guarantee continuous compliance with them, so that this statement also covers them at all times.

Regarding the submission of information to European Chemicals Agency (ECHA) regarding SVHCs in articles according to Article 9 of the EU Waste Framework Directive (WFD) please see our SCIP-Statement.

3. Annex XVII of the REACH Regulation (list of substances subject to authorization)

Annex XVII of the REACH Regulation is the list of prohibited substances or substances requiring a specific authorization procedure if there is no alternative for certain applications. In the course of the authorization procedure, the specific conditions under which the listed substance may be placed on the market / used are defined.

This Annex will be continuously updated on the basis of scientific results and knowledge.

At the time of this statement, our products do not contain any substances listed in Annex XVII of the REACH Regulation.

Documented checks for every relevant change of law guidelines are anchored in our management system and thereby guarantee continuous compliance with them, so that this statement also covers them at all times.

4. POP-Regulation (EU) 2019/1021 on persistent organic pollutants - Perfluorooctanoic acid, its salts and related substances (PFOA) as well as Perfluorooctane sulfonic acid its salts and related substances (PFOS)

From 04.07.2020 on Perfluorooctanoic acid, its salts and related substances (PFOA) are no longer covered by the REACH regulation Annex XVII, but fall under restrictions contained in Regulation (EU) 2019/1021 on persistent organic pollutants ("POP Regulation").

At the time of this statement, our products do not contain any substances listed in Annex XVII of the REACH Regulation and therefore also no persistent organic pollutant acc. POP Regulation.



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Documented checks for every relevant change of law guidelines are anchored in our management system and thereby guarantee continuous compliance with them, so that this statement also covers them at all times.

5. RoHS Directive 2 und RoHS Directive 3

The RoHS Directive 2 is the "*Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment*" and the RoHS Directive 3 is the "*COMMISSION DELEGATED DIRECTIVE (EU) 2015/863 of 31 March 2015 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances*".

RoHS Directives 2 and 3 are the implementation of Annex XIV of the REACH Regulation.

Compliance with the RoHS Directives is monitored by the current entries in the IMDS database.

At the time of this statement, our products do not contain any substances with more than 0.1 mass percent (0.01% for cadmium) that are listed in the RoHS Directive.

Documented checks for every relevant change of law guidelines are anchored in our management system and thereby guarantee continuous compliance with them, so that this statement also covers them at all times.

6. GADSL

The basis for the IMDS database is the **GADSL** (Global Automotive Declarable Substance List), which lists all possible pure substances used in car parts. Thus the compliance is also monitored by the current entries in the IMDS database.

Since we **do not** place any chemical products on the market, there is no need to publish **safety data sheets** for our end products at any time.

7. WEEE Directive

WEEE Directive 2012/19/EU (**W**aste of **E**lectrical and **E**lectronic **E**quipment) is conducive to prevent waste electrical and electronic equipment and to reduce such waste through reuse, recycling and other forms of recovery. It sets minimum standards for the treatment of WEEE in the EU.

In Austria, this directive has been transposed into national law in the "Elektroaltgeräteverordnung" (EAG-VO).

This statement confirms compliance with the WEEE Directive.

8. ELV - End of Life Vehicles

The ELV Directive (*DIRECTIVE 2000/53/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 September 2000 on end-of life vehicles*) lay down minimum standards so that vehicles can be disposed of in a controlled manner at the end of their product life cycle and broken down into recyclable components.

In Austria, this directive has been transposed into national law in the "Altfahrzeugverordnung".

This statement confirms compliance with the End-of-Life Vehicles Directive.



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9. Conflict Minerals

Particularly in the Democratic Republic of Congo and the neighboring states, the armed conflict that continues there is financed by the extraction of certain raw materials. Under the most severe human rights violations, militias control raw material mines and sell the so-called conflict minerals (mainly gold, tantalum, tungsten and tin - "3TG minerals") to the whole world.

The EU Parliament has decided to exercise due diligence when importing conflict minerals. The EU Regulation of 17 May 2017 laying down duties of care in the supply chain for Union importers of tin, tantalum, tungsten, their ores and gold from conflict and high risk areas came into force on 8 June 2017. The new EU regulations are intended to oblige EU importers of so-called conflict minerals to carry out due diligence checks along their supply chains. Larger manufacturers will also have to provide information on how they comply with the requirements of the new regulation from the source of the raw material.

In order to ensure that no "conflict minerals" are used at Hirschmann Automotive GmbH, suppliers are requested to submit "conflict minerals reports" on an annual basis or at least when the database and / or the official form are updated, which show that no materials from high-risk areas are used. Based on the completed supplier forms, Hirschmann Automotive GmbH creates an RMI_CMRT form at company level and can be made available to you on request by email or via IPOINT (iPCMP ID # 19227).

10. Cobalt

In response to customer inquiries and the problems identified in cobalt mining, we interview our suppliers to identify potential sources of cobalt in our supply chain. Via IMDS we receive information about our suppliers (purchased parts), which of the parts contain cobalt. Even though these parts do not contain large amounts of cobalt, we have found that cobalt is present in small amounts in many parts. The main focus is on parts that contain intentionally added cobalt.

In order to ensure that the data is still up-to-date, the suppliers request new data via the official form (RMI_EMRT) every year or at least when the database and / or the official form are updated. Based on the completed supplier forms, Hirschmann Automotive GmbH creates an RMI_EMRT form at company level and can be made available to you by email on request.

11. California Proposition 65

The „California Proposition 65“ („Safe Drinking Water and Toxic Enforcement Act of 1986“) is an initiative of the State of California to ensure that no one in the course of their business knowingly and intentionally exposes an individual to chemicals known to the State of California to be carcinogenic or toxic to reproduction without first giving a clear and appropriate warning.

To implement the law, the State of California has, among other things, published a list of chemicals suspected of being carcinogenic or toxic to reproduction. The list currently contains more than 1,000 chemicals.

Our products can include listed substances such as Nickel or lead contained in the permissible limit values of the chemical law guidelines mentioned under points 1 - 8. However, California Proposition 65 does not prohibit the sale and use of these substances or products containing them. We would like to point out that you as a customer of our products might be responsible for further obligations as a result of the use of these substances.

Hirschmann Automotive GmbH is providing IMDS entries which clearly show at any time the substances and concentrations contained.



12. Toxic Substances Control Act (TSCA)

The TSCA is an inventory of chemicals currently in use in the US market. The chemicals listed in the TSCA inventory are referred to as "existing chemicals", while chemicals that are not listed are referred to as new chemicals. The TSCA prohibits the manufacture or import of chemicals that are not on the inventory or are not subject to any of the many exceptions.

The Inventory was initially published in 1979, and a second version, containing about 62,000 chemical substances, was published in 1982. The TSCA Inventory has continued to grow since then, and now lists more than 86,000 chemicals.

Hirschmann Automotive GmbH is providing IMDS entries which clearly show at any time the substances and concentrations contained.

Statement regarding the five PBTs listed under TSCA 6 (h) since March 2021:

PBT	CAS Nr.	Current EU regulation	statement
Bis(pentabromophenyl)ether Deca BDE	1163-19-5	REACH Annex XVII Entry 67, RoHS	See item 3 & 5
Phenol, isopropylated, phosphate (3:1) PIP 3:1	68937-41-7	REACH CoRAP	n.a.
2,4,6-tri-tert-butylphenol 2,4,6-TTBP	732-26-3	REACH CoRAP	n.a.
Hexachlorobuta-1,3-diene HCBD	87-68-3	POP-regualtion	See item 4
Pentachlorobenzenethiol PCTP	133-49-3	-	n.a.

13. Mica

In two major mica-producing countries, India and Madagascar, mica supply chains rely heavily on artisanal and small-scale extraction as well as manual processing. Reports in recent years have highlighted instances of child labor, illegal operations and unsafe health and safety conditions in mica production and processing.

Via IMDS we receive information about our suppliers (purchased parts), which of the parts contain MICA.

In order to ensure that the data is still up-to-date, the suppliers request new data via the official form (RMI_EMRT) every year or at least when the database and / or the official form are updated. Based on the completed supplier forms, Hirschmann Automotive GmbH creates an RMI_EMRT form at company level and can be made available to you by email on request.

14. European Supply Chain Due Diligence Act

The European Supply Chain Due Diligence Act is intended to ensure due diligence along the supply chain with regard to human rights and the environment.

Hirschmann Automotive GmbH obliges its suppliers to comply with human rights and the environment in its Supplier Code of Conduct (<https://www.hirschmann-automotive.com/en/download-center>).

Confirmations that go beyond this and the filling out of specific forms must be invoiced separately according to the actual research effort.



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15. Final

Hirschmann Automotive GmbH monitors all legal developments and changes and adapts the implementation of the above-mentioned regulations and guidelines to new requirements in a timely manner.

Confirmations which go beyond the present opinion and also beyond the legal requirements applicable in the EU must be invoiced separately according to the actual search effort.

For any questions regarding the implementation of the REACH Regulation, Annexes XIV and XVII of the REACH Regulation, the ECHA Candidate List, the RoHS Directive, WEEE (in Austria the "Elektroaltgeräteverordnung"), the ELV (in Austria the "Altfahrzeugverordnung"), the Conflict Minerals and California Proposition 65 and can be contacted us under:

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Rankweil, 25. September 2023

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