

Product compliance guideline



SEW-EURODRIVE GmbH & Co KG
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Due to a number of statutory regulations and directives, including the REACH Regulation, the RoHS Directive and the Dodd-Frank Act, the products manufactured by SEW-EURODRIVE are subject to special requirements in terms of the materials they contain, environmental compatibility and conservation of resources.

In view of tightening legislation, manufacturers are required to ensure not only product and user safety, but also that no prohibited substances are processed and that substance restrictions are observed. Increasingly, customers are also requesting declarations of conformity from their suppliers or premanufacturers to ensure that their products are free from harmful substances or comply with current limit values.

For this reason, all products and materials supplied to SEW-EURODRIVE must also comply with all applicable legal regulations or meet specific requirements. The directives and regulations detailed below are mandatory for all supplier products. They must be observed and, upon request, reported in writing to SEW-EURODRIVE. SEW-EURODRIVE may also request additional, specific declarations of conformity as part of its qualification and sampling process.

The supplier is obligated to ensure that these standards are also implemented in its own supply chain.

RoHS Directive

The **EU Directive 2011/65/EU** (“RoHS Directive”) restricts the use of specific substances in electrical and electronic devices.

Where the supplier product constitutes an electrical or electronic device within the meaning of the RoHS Directive or if the supplier product will or could become a part or accessory of an electrical or electronic device, the maximum concentration values tolerated specified in Annex II of the RoHS Directive for lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyl (PBB), polybrominated diphenyl ethers (PBDE), di(2-ethylhexyl) phthalat (DEHP), butylbenzyl phthalate (BBP), dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP) in homogeneous materials must be adhered to, unless an exemption pursuant to Article 4(6) of the RoHS Directive (see Annexes III and IV) can be claimed for all higher concentrations.

China RoHS

Where the supplier product constitutes an electrical or electronic device within the meaning of the China RoHS Directive or if the supplier product will or could become a part or accessory of an electrical or electronic device, the maximum concentration values tolerated specified in standard **GB/T 26572 of the People's Republic of China** for lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls and polybrominated diphenyl ethers in the EEP-A/B/C test units must be adhered to, unless the declaration table regarding the concentration of hazardous substances pursuant to the standard SJ/T 11364-2014 of the People's Republic of China and the “Environmental Protection Use Period” (EPUP) pursuant to the standard SJ/Z 11388-2009 of the People's Republic of China are made available to SEW-EURODRIVE.

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REACH Regulation

The **Regulation (EC) No. 1907/2006** (“REACH Regulation”) governs the manufacture, use and placing on the market of substances, mixtures and products. The substances contained in the products provided by the supplier are, insofar as is required under the provisions of the REACH Regulation, preregistered or registered once the transition period has ended.

No supplier products must contain any of the substances on the “Candidate List of Substances of Very High Concern” (accessible at <https://echa.europa.eu/candidate-list-table>), unless sufficient information to ensure safe use of the product (the name of the relevant substance as a minimum) is made available to SEW-EURODRIVE.

No supplier products must contain any of the substances listed in Annex XIV of the REACH Regulation, unless the supplier or one of his upstream suppliers has successfully requested authorisation for the manner of use of the product on the part of SEW-EURODRIVE before the relevant application deadline (pursuant to Article 58(1)(c)(ii) of the REACH Regulation), or the supplier notifies SEW-EURODRIVE about the lacking authorisation for placing on the market and use of the supplier product within the European Economic Area as of the sunset date (pursuant to Article 58(1)(c)(i) of the REACH Regulation) and does so without delay after becoming aware of the failed application.

No supplier products must contain any substances that are subject to restrictions pursuant to Annex XVII of the REACH Regulation.

TSCA 5 PBT

Under the U.S. **Toxic Substances Control Act (TSCA)**, Section 6(h), 40 C.F.R. Part 751, Subpart E, persistent, bioaccumulative and toxic chemicals (PBTs) are regulated. PBTs accumulate in the environment over time and therefore may pose potential risks to humans and other organisms.

All supplier products must comply with the substance restrictions and prohibitions for PBTs. This does not apply to supplier products for which exemptions or transitional arrangements can be claimed.

For articles containing such PBT (above the specified threshold values, if applicable), the supplier must provide SEW-EURODRIVE in writing with the name of the PBT contained and applicable exemptions or transitional arrangements so that SEW-EURODRIVE can comply with “recordkeeping” obligations when supplying products to the USA.

In addition, for substances and mixtures containing PBT, the supplier has to provide a U.S. Safety Data Sheet to SEW-EURODRIVE on demand.

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WEEE Directive

The **EU Directive 2012/19/EU** (Directive on Waste Electrical and Electronic Equipment, in short: “WEEE Directive”) regulates, among other things, the disposal of electrical and electronic equipment, the marking with the symbol of the crossed-out waste bin and the date of manufacture or bar under the sign, the registration of affected products in the member states of the European Union, the notification of the products placed on the market and their handling at the end of the use phase.

It aims to prevent or reduce the adverse impacts of the generation and management of waste from electrical and electronic equipment and to reduce overall impacts of resource use and to improve its efficiency, thereby contributing to sustainable development. Since supplier products may also fall under the WEEE Directive and its national transpositions in the European member states, affected products have to meet the requirements so that they can be marketed by SEW-EURODRIVE in Germany and abroad. Manufacturers are obliged to design their products in a way that the reuse, disassembly and recycling of old equipment, its components and materials are taken into consideration and facilitated, unless the advantages of the special design features or manufacturing processes outweigh the disadvantages, for example with regard to environmental protection and/or safety regulations.

Conflict minerals

Conflict minerals are specific raw materials (tantalum, tin, gold and tungsten) that are mined under conditions of violent conflict, illegally and outside of state controls in the Democratic Republic of the Congo or neighboring countries (Angola, Burundi, Republic of the Congo, Rwanda, Zambia, Sudan, Tanzania, Uganda, the Central African Republic). The **Dodd-Frank Act (SEC 1502)** requires US companies listed on the stock exchange that use one of these raw materials in their products to provide a separate report detailing its origin in order to rule out that it is a conflict mineral. All companies that are direct or indirect suppliers of this company are also subject to this duty of disclosure.

The supplier must therefore be able to provide SEW-EURODRIVE with a Conflict Minerals Reporting Template (CMRT) for his product portfolio.

Marking

Goods being subject to a CE marking obligation have to be marked in accordance with applicable law; documents required for such marking shall be attached to such goods. The aforementioned requirements apply accordingly to goods that are subject to a UKCA marking obligation due to a (final) place of delivery in the United Kingdom.

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Paint-wetting impairment substances

As a manufacturer of products supplied to the automotive industry, among others, SEW-EURODRIVE has affirmed to its customers that all products are free of paint-wetting impairment substances (such as silicones), thus reliably preventing any impairment of customer painting processes. For this reason, products and materials supplied to SEW-EURODRIVE must not contain any paint-wetting impairment substances or the supplier must verify that the supplied products do not emit any paint-wetting impairment substances pursuant to VDMA standard sheet 24364.

Functional Safety

If functional safety requirements are specified for purchased parts, these must be confirmed e.g. in the form of data sheets or other suitable evidence.

Product Security

SEW-EURODRIVE has a high quality standard for its developed, manufactured and distributed products and systems. This also includes Product Security, which is ensured throughout the entire product life cycle in the respective processes. The following requirements are therefore placed on security-relevant purchased parts:

- Compliance with the relevant requirements according to IEC 62443-4-1.
- Reporting of product security incidents and vulnerabilities (e.g., in the form of security advisories) to the central mailbox cert@sew-eurodrive.com.
- Informing and providing of appropriate measures to address vulnerabilities.