

Product Compliance Requirements for Suppliers

Huber+Suhner

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History of Changes

Version	Changes	Date	Name
A	New Release	July 2024	E. Örs-Bartussek
B	Revision	July 2026	L. Ollier

1. Introduction

1.1 Purpose

This document – which is part of our H+S Technical Terms of Delivery – outlines the rules that apply to all Huber+Suhner suppliers regarding the delivery and use of substances, whether on their own, in mixtures, or in articles. Huber+Suhner expects suppliers to ensure that all supplied products meet specified regulatory requirements and directives in the production or shipping country of the supplier. It is our expectation that our suppliers foster transparency and accountability in material sourcing and usage.

1.2 Scope

These requirements are applicable to Huber+Suhner suppliers delivering raw materials, H+S designed products, processes and commercial-off-the-shelf (COTS) products sold to our customers. For further details on these product type definitions, please refer to the H+S Technical Terms of Delivery. Suppliers are responsible for the product and export compliance of the delivered items.

Please note that industry-specific product compliance requirements will be extended for suppliers providing products or services to the Automotive, Railway, Aerospace/Defense, or Medical sectors.

2. General product compliance requirements

This document outlines the key regulatory requirements for the delivery and use of hazardous substances. Suppliers must ensure compliance with the following requirements:

- **Requirement 1:** No use of prohibited substances
- **Requirement 2:** Usage Substances of Concern that may pose risks must not be used unless an exemption is granted.
- **Requirement 3:** To demonstrate conformity, either SEN11_fo_Material-compliance-supplier-template shall be fulfilled or the suppliers shall deliver the following information
 - **Material Declarations:** Suppliers should provide full material declarations indicating compliance with all relevant regulations. Additionally, suppliers must disclose the presence of any substances of concern or hazardous substances in their products.
 - **Certificates of Compliance/Declarations of Conformity:** Suppliers must issue certificates of compliance/Declarations of Conformity for all applicable standards and regulations.
 - **Test Reports:** Supplier should provide detailed test reports upon request.
 - **Product-level compliance data:** Where regulatory obligations require detailed information, such as data on reusability, recyclability, end-of-life treatment, embedded carbon, or origin, suppliers must disclose such data in a complete and transparent manner.
- **Requirement 4:** Proactively communicate any deviations from regulatory compliance promptly.
- **Requirement 5:** Proactively communicate any changes in the substances or materials used that may affect material compliance.
- **Requirement 6:** Suppliers must stay informed about changes in legal requirements
- **Requirement 7:** Suppliers must take immediate corrective actions if any non-compliance is identified.
- **Requirement 8:** Going forward suppliers should agree to periodic audits and inspections to verify compliance with these requirements.

The following section provides an overview of the relevant product compliance directives and regulations. Please note that, depending on the project scope and geographical region, the applicable requirements and their level of stringency may vary.

However, particularly with respect to trade and export compliance, additional data requirements may apply, requiring suppliers to provide further detailed disclosures.

3. Product compliance directives and regulations

3.1 REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals)

Compliance Requirement: Suppliers must ensure that all substances, mixtures and articles provided comply with the latest REACH regulations (EC 1907/2006). Suppliers are obliged:

- To declare substances included in the Substances of Very High Concern (SVHC) list
- To inform the HUBER+SUHNER at least two years in advance of the "Sunset date", if the supplied substances are listed in ANNEX XIV
- Not to provide articles containing substances listed in ANNEX XVII
- To register the SVHC substances when imported into the European Union

Documentation: Suppliers must provide Safety Data Sheets (SDS) for all chemicals, including information (Certificate of Compliance) on Substances of Very High Concern (SVHC) and ensure proper registration of all applicable substances.

SVHC Notification: Suppliers must notify the presence of Substances of Very High Concern (SVHC) if concentrations exceed 0.1% by weight and provide safe use information.

SCIP Notification: Supplier must submit the SCIP (Substances of Concern in Products) Notification Number ensuring compliance with waste management regulations under the EU Waste Framework Directive.

3.2 RoHS (Restriction of Hazardous Substances)

Compliance Requirement: All electronic and electrical products must comply with RoHS Directive 2011/65/EU (and subsequent amendments). To fulfill the substance requirements for H+S applicants, adherence to the IEC 63000 standard is required.

Documentation: The material declaration content should meet the requirements on IEC 62474 for the applicable substances. Suppliers must provide a Certificate of Compliance (CoC) confirming RoHS compliance and detailed testing reports upon request (i.e. a certified test report result according to IEC 62321).

Labeling: Products must be properly labeled with RoHS compliance marks.

3.3 Conflict Minerals

Compliance Requirement: Suppliers must adhere to the Dodd-Frank Act and EU Regulation 2017/8821, Swiss Supply Chain Act (Art.9 VSoTr) ensuring that materials do not contain conflict minerals (tin, tungsten, tantalum, and gold) sourced from conflict zones.

Documentation: Complete and submit the Conflict Minerals Reporting Template (CMRT) as well as the Extended Minerals Reporting Template (EMRT). Traceability information for the sources of minerals must be provided.

Transparency: Suppliers must establish policies and due diligence frameworks to avoid sourcing from conflict-affected areas.

3.4 POP (Persistent Organic Pollutants)

Compliance Requirement: Suppliers must adhere to the regulations outlined in EU Regulation 2019/1021 concerning Persistent Organic Pollutants (POPs). Suppliers must maintain comprehensive documentation demonstrating compliance with POP regulations and ensure that substances prohibited are not supplied whether on their own, in mixtures or in articles above the defined thresholds.

3.5 Packaging and Packaging Waste Regulation (PPWR)

Compliance Requirement: The supplier must ensure that all packaging materials used comply with the requirements set forth in Regulation (EU) 2025/40 regarding packaging and packaging waste. This includes adherence to limits on heavy metals. The total concentration of lead, cadmium, mercury, and hexavalent chromium, resulting from substances present in the packaging or its components, does not exceed 100 mg/kg. Additionally, suppliers are expected to demonstrate progress towards meeting the EU's 2030 requirements, where applicable, including those related to substances of concern, recycled plastic content, recyclability, and reusability.

Documentation: Supplier must provide technical documentation for PPWR compliance upon request.

3.6 TSCA (Toxic Substances Control Act)

Compliance Requirement: Upon request, suppliers must comply with restrictions under TSCA Section 6(h), which targets persistent, bioaccumulative, and toxic (PBT) chemicals.

Documentation: Supplier must provide TSCA compliance certifications upon request.

Notification: Suppliers must notify if any products contain these substances and ensure that all chemicals are compliant with the applicable restrictions.

3.7 China RoHS

Compliance Requirement: China RoHS II directive as specified in standard GB/T 26572-2011 requires manufacturers to disclose and restrict the use of hazardous substances in electrical and electronic products, ensuring compliance through substance testing and labeling before market entry. The substances and their restriction limits are as follows: lead (0.1%), mercury (0.1%), cadmium (0.01%), hexavalent chromium (0.1%), polybrominated biphenyls (0.1%), and polybrominated diphenyl ethers (0.1%). Upon request, supplier has to provide all necessary information to fulfil the required information including labeling.

3.8 ELV (End-of Life Vehicle)

Compliance Requirement: The ELV Directive applies to all parts and materials used in vehicles. Suppliers must comply with the ELV Directive 2000/53/EC, which aims to minimize waste from end-of-life vehicles. The use of lead, mercury, cadmium, and hexavalent chromium is strictly regulated and only allowed in specific applications listed in Annex II, which is regularly updated.

3.9 IMDS

Compliance Requirement: Automotive suppliers are required to comply with IMDS requirements by accurately submitting data for all materials used in components and subcomponents via the IMDS platform.

3.10 California Proposition 65 (Prop 65)

Compliance Requirement: Upon request, the supplier shall provide information on the materials used in their products and clear warnings about the chemicals listed in California state regulation.

3.11 Regulation on Deforestation-free Products (EUDR)

Compliance Requirement: The EUDR applies to wood- and paper-based packaging materials, as well as natural rubber, when these are placed on the EU market. Suppliers must provide traceable, verifiable data proving product origin, legality, and deforestation-free production, including precise geolocation of production sites, supporting documentation, and information enabling risk assessment and due diligence.

3.12 Uyghur Forced Labor Prevention Act (UFLPA)

Compliance Requirement: UFLPA presumes that goods linked in any way to Xinjiang or listed entities are made with forced labor and bans their import into the U.S. Importers must prove with strong evidence that no forced labor was involved, or shipments are blocked. Suppliers consent that company coordinates may be transferred to the USA.

3.13 Carbon Border Tax Adjustment

Compliance Requirement: CBAM applies to EU importers of certain cement, iron & steel, aluminum, fertilizers, electricity and hydrogen. Importers are required to report embedded emissions and purchase and surrender CBAM certificates. Suppliers must provide verified data on embedded emissions (direct/indirect) and product details (e.g. volume, origin, HS code) for CBAM reporting.

4. Product compliance Requirements Linked to Export Compliance

Suppliers must comply with applicable export control and responsible sourcing requirements.

4.1 Rare Earth Elements (REE)

Compliance Requirement: Suppliers must declare whether rare earth elements (REEs) are present in their products and provide available information on their origin and sourcing. They are required to ensure that REEs are sourced in compliance with applicable export control, sanctions, and responsible sourcing requirements. Upon request, suppliers must provide traceable and verifiable supporting documentation.

4.2 Smelt and Cast Origin (Copper, Steel, Aluminum) – US Requirements

Compliance Requirements: Suppliers must disclose the primary and, where applicable, secondary countries of smelting and casting of copper, steel, and aluminum contained in their products. The information must be accurate, traceable, and supported by verifiable supply chain data to meet US regulatory requirements. Suppliers are required to promptly report any changes in smelter or casting locations that may impact compliance.

5. List of the References

- 1) REACH: [EUR-Lex - 02006R1907-20140410 - EN - EUR-Lex \(europa.eu\)](#)
SVHC List: [Candidate List of substances of very high concern for Authorisation - ECHA \(europa.eu\)](#)
SCIP: [SCIP-Database - ECHA \(europa.eu\)](#)
- 2) ROHS: [Directive - 2011/65 - EN - rohs 2 - EUR-Lex \(europa.eu\)](#)
Overview: [RoHS Directive - European Commission \(europa.eu\)](#)
- 3) POP: [Regulation - 2019/1021 - EN - EUR-Lex \(europa.eu\)](#)
Substance List: [List of substances subject to POPs Regulation - ECHA \(europa.eu\)](#)
- 4) Conflict Minerals
CMRT: [Regulation - 2017/821 - EN - EUR-Lex \(europa.eu\)](#)
EMRT: [Extended Minerals Reporting Template \(responsiblemineralsinitiative.org\)](#)
- 5) Packaging and Packaging Waste Regulation (EU) 2025/40 (94/62/EC): [Regulation - EU - 2025/40 - EN - PPWR - EUR-Lex](#)
- 6) TSCA 6(h): [Persistent, Bioaccumulative, and Toxic \(PBT\) Chemicals under TSCA Section 6\(h\) | US EPA](#)
- 7) Prop65: [Proposition 65 - OEHHA \(ca.gov\)](#)
Substance List: [The Proposition 65 List - OEHHA \(ca.gov\)](#)
- 8) China RoHS: [China Electronics Standardization Institute \(cesi.cn\)](#)
- 9) ELV: [Directive - 2000/53 - EN - EUR-Lex \(europa.eu\)](#)
- 10) IMDS: [IMDS | International Material Data System \(mdsystem.com\)](#)
- 11) California Proposition 65: [Proposition 65 - OEHHA \(ca.gov\)](#)
Substance List: [The Proposition 65 List - OEHHA \(ca.gov\)](#)
- 12) Regulation (EU) 2023/115 on deforestation-free products: [EUR-Lex - 02023R1115-20251226 - EN - EUR-Lex](#)
- 13) Uyghur Forced Labor Prevention Act (UFLPA): [PUBL078.PS](#)
- 14) Carbon Border Adjustment: [CL2023R0956EN0010010.0001.3bi_cp 1..1](#)