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# **CORPORATE**

## LIST OF PROHIBITED SUBSTANCES

**RONAL GROUP: SEPTEMBER 2023**

## Change Log

Version	Date	Department	Description of changes
1	February 20	Environment:	Elaboration of the document
2	September 23	Environment/SCM	Update of the document

## Confirmation & Signature

With this signature you confirm your intention to comply with the requirements of the RONAL GROUP document "List of Prohibited Substances" and to take and implement appropriate and reasonable measures.

Date of Approval	Name of Company	Contact: First & last name	Role	Signature

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## INTRODUCTION

Our strategic goals with regard to environmental protection, occupational health and safety includes the reduction of pollutants and the protection of the natural environment. To this end, we constantly review and improve our processes and products.

## PURPOSE

As part of our sustainability concept, we aim to ensure that we identify environmental, social and governance risks and opportunities at an early stage at every stage of the value creation process.

## GENERAL REQUIREMENTS OF THE RONAL GROUP

- ✔ In the relevant provisions of the Hazardous Substances Act, there are substance bans, restrictions, limit values and declaration obligations, which must be fully complied with by all suppliers. All deliveries and services must be provided in accordance with these requirements.
- ✔ This list of prohibited substances provides a simplified overview of the prohibitions and restrictions on the placing on the market of dangerous substances in the European Union and in other countries. It contains a non-exhaustive selection of fabrics that is relevant for the RONAL GROUP. It is also the supplier's obligation to comply with the current legal requirements (e.g. national laws) and to follow them.
- ✔ For some substances, the legal prohibitions are limited to certain applications or special exemptions are permitted. Compliance with this list of prohibited substances is an essential part of the terms of delivery.

The principles listed in the list of prohibited substances are based on the content of the following conventions and standards, as well as other current laws, directives and standards (not exhaustive):

### RONAL GROUP

- Supplier Handbook of the RONAL GROUP
- Supplier self-disclosure of the RONAL GROUP
- Sustainability Guideline for Business Partners of the RONAL GROUP
- Policy of the RONAL GROUP: Occupational Health and Safety, Energy, Environment and Quality
- Privacy Policy/Policy of the RONAL GROUP

### OTHER LAWS, DIRECTIVES AND STANDARDS

- Dodd-Frank Act on Conflict Minerals & Conflict Minerals Regulation (EU) 2017/821
- AFV: Directive 2000/53/EC on end-of-life vehicles
- BAT: Best available Techniques - Prevent and Control Industrial Pollution
- ChemVerbotsV: Chemicals Prohibition Ordinance (DE, Annex I)
- CLP: Regulation (EC) No 1272/2008 – Regulation on classification, labelling and packaging of substances and mixtures
- EU-POPs: Regulation (EC) No 2019/1021 Article 3 – Annex I + IV Persistent organic pollutants
- GADSL: Global Automotive List of Notifiable Substances
- GHS: Globally Harmonized System of Classification, Labelling and Packaging of Chemicals
- IE: Directive 2010/75/EU on industrial emissions
- REACH:
  - Regulation (EC) No 1907/2006 (REACH) – SVHC Candidate List (current edition)
  - Regulation (EC) No 1907/2006 (REACH) Article 56, Annex XIV - List of substances to be registered
  - Regulation (EC) No 1907/2006 (REACH) Article 67, Annex XVII Restriction List
- RoHS: Directive (EU) 2011/65, Article 4 / Annex II

## 1 Definitions, notes and links

### 1.1 Global List of Declarable Substances in the Automotive Sector (GADSL)

The GADSL (*Global Automotive Declarable Substance List*) is a globally harmonized declarable substance list. It is the result of the efforts of a global team from the automotive, automotive supply and chemical/plastics industries. The GADSL includes substances that are expected to be present in a material or part that remains in a vehicle at the point of sale.

For more information, please visit: [www.gadsl.org](http://www.gadsl.org)

### 1.2 International Material Data System (IMDS)

IMDS is the material data system of the automotive industry, which collects, maintains, analyzes and archives all materials and substances used for automotive manufacturing.

For more information, please visit: [www.mdssystem.com](http://www.mdssystem.com)

### 1.3 Conflict Minerals

Conflict minerals currently include cassiterite, columbite/tantalite, and wolframite (the most common derivatives are tin, tantalum, and tungsten) as well as mica, cobalt and gold, regardless of where the minerals are mined, processed, or sold.

The definition of conflict minerals is found in the legislation *Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502; Conflict Minerals*.

### 1.4 Recycled Content

The portion of the weight of a material or product that consists of materials recovered from or otherwise derived from the scrap stream, either from the production process or after the use by the consumer. Recycled content does not consist of domestic scrap.

**Post-Industrial Recyclates (PIR):** Scrap which is a by-product of the production process (excluding home scrap) and reused in the production of the part.

**Home scrap:** Material commonly reused by the industry within the original production process. Examples include materials, which are re-granulated and re-fed within a facility. Home scrap is not considered recycled content.

### 1.5 Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

REACH is a regulation of the European Union: EU Regulation 1907/2006/EC.

For more information, please visit: [REACH Legislation](#)

### 1.6 REACH Annex XIV Substances

The substances listed in REACH Annex XIV will be phased out of all products in time to meet the corresponding sunset date. These phase-out measures shall be handled and notified in the same way as any other partial amendments.

The current list of substances in Annex XIV can be found at:

[Authorisation List Annex XIV of REACH](#)

## 1.7 Substances of Very High Concern (SVHC)

A substance of very high concern (SVHC) is a chemical substance (or part of a group of chemicals) for which it has been proposed that its use within the European Union is subject to authorisation under the REACH Regulation.

For more information, see:

[Candidate List of substances of very high concern](#)

## 1.8 Registration of Substances

Registration of substances (as set out in Table 1, p.10) are identified in the GADSL and/or Table 1 by the name of the substance, the type of restriction, the threshold limits (where applicable), the applications affected/exempted and the effective date. All substances listed in the GADSL and/or Table 1 must be reported to the IMDS.

## 2 Substance Management

### 2.1 Applicable laws, directives and standards

Overview of applicable laws, directives and standards:<sup>1</sup>

<b>AFV:</b>	Directive 2000/53/EC on end-of-life vehicles
<b>ChemVerbotsV:</b>	Chemicals Prohibition Ordinance (DE, Annex I)
<b>CLP: Regulation</b>	(EC) No 1272/2008 – Regulation on classification, labelling and packaging of substances and mixtures
<b>EU-POPs:</b>	Regulation (EC) No 2019/1021 Article 3 – Annex I + IV Persistent organic pollutants
<b>GADSL:</b>	Global Automotive List of Notifiable Substances ( <a href="http://www.gadsl.org">www.gadsl.org</a> )
<b>GHS:</b>	Globally Harmonized System of Classification, Labelling and Packaging of Chemicals
<b>REACH:</b>	Regulation (EC) No 1907/2006 (REACH) – SVHC Candidate List (current edition) Regulation (EC) No 1907/2006 (REACH) Article 56 – Annex XIV - List of substances to be registered Regulation (EC) No 1907/2006 (REACH) Article 67 – Annex XVII Restriction List
<b>RoHS:</b>	Directive (EU) 2011/65, Article 4 / Annex II

### 2.2 Declarable and prohibited Substances

In general, the GADSL and the laws listed there are to be applied.

- ✔ After each update or change to the GADSL, all data sheets containing confidential or declared pure substances hidden as jokers must be checked. If data sheets contain substances that have been newly included in the GADSL as declarable or prohibited, these data sheets must be updated immediately after the GADSL is amended, the substances must be explicitly mentioned in them and the data sheets must be sent to the RONAL GROUP again.
- ✔ All substances labelled with *P = Prohibited* in the GADSL must not exceed the respective limit values in the specified fields of application.
- ✔ Suppliers, whose substances remain on or in the product, are obliged to enter the ingredients in the IMDS.
- ✔ Material bans must also be complied with in the case of carry-over parts (COP) and the usability of the parts must be checked accordingly.
- ✔ *Products and mixtures* may only contain or release substances that have been registered and authorised in accordance with Regulation (EC) No 1907/2006 ("REACH") within the time limits for the intended uses.
- ✔ The laws, directives and standards from Section 2.1 as well as the applicable national and international laws and regulations must be observed. The requirements must be met by the supplier.

<sup>1</sup> Not conclusive; For further laws, directives and standards, see chapter Introduction (page 4)

### 3 Declaration of Substances

#### 3.1 Information obligations of the supplier

The supplier is obligated to inform the RONAL GROUP immediately and to jointly clarify the further course of action of the responsible procurement department, if a substance contained in a component

- may no longer be used due to a new marking in the GADSL with "P",
- is newly regulated by Annex II to Directive 2000/53/EC;
- is included in the list of substances subject to authorisation (Annex XIV to Regulation (EC) No 1907/2006);
- is included in the list for the restriction of the manufacture, placing on the market and use of certain dangerous substances, mixtures and products (Annex XVII to Regulation (EC) No 1907/2006) and is prohibited in its application in accordance with the entry in Annex XVII.

Suppliers of operating materials are obliged to provide a safety datasheet and the exact chemical composition in the delivery condition to the authorized person/department. The confidential data will only be used for industrial hygiene purposes for safety chemical labelling, evaluation and release. Access is limited to a defined group of people. The supplier has the option of obtaining a confidentiality agreement in advance.

#### 3.2 Reporting on restricted Substances and recycled Content

The RONAL GROUP is required by its customers to comply with the requirements and regulations of the GADSL for reporting on the substances contained in products, both in production and in spare parts. Additional or amended requirements for the GADSL are included in Table 1.

#### 3.3 Reporting dates and deadlines

Suppliers are obliged to comply with the reporting deadlines for materials, spare parts and products.

Transmission of product data:

- Current materials, substances and products should already have been reported to IMDS. If this is not the case or if an update is required (see below), they shall be reported immediately.
- All materials, substances and products shall have a final material datasheet, which is reported in the IMDS in time.
- All materials, substances and products shall have a final accepted material datasheet in IMDS.

#### 3.4 Electronic reporting in the International Material Data System (IMDS)

In order to track questionable and critical materials, all suppliers who supply products to the RONAL GROUP that remain in a finished product must declare their substances in the International Material Database System (IMDS) and communicate them to the RONAL GROUP (RONAL ID: 356).



Suppliers are obliged to:

- Report Substances:** All substances covered by the GADSL and/or Table 1 (Identity and weight percentage).
- Report Materials:** 100% of the materials, including classification and weight of all materials.
- Report Components:** All sub-components in an assembly (wheel project) must be defined as such appear, i.e. as elements in the tree structure of the IMDS data sheet, as described in IMDS Recommendation 001. The mass specified at the top node of the component ("*Measured Weight Per Piece*") must represent the actual mass.  
Real masses are either derived from statistical product control charts or determined by weighing a statistically relevant number of units and calculating the statistical average (arithmetic mean).
- Report recycled Contents:** Report the percentage of recycled content in all materials.

**An update of the existing IMDS data is required under following circumstances:**

- New material.
- Change in the mass of a material that exceeds  $\pm 10\%$  or 50 g.
- A new substance listed in the GADSL and/or Table 1 is added to a material:
- A substance that has not yet been notified, but is included in the GADSL and/or Table 1.
- A change in the mass of a substance already reported in the GADSL and/or Table 1 that exceeds  $\pm 10\%$ , or if a change in mass results in a threshold requirement being exceeded.
- A modification of the recycled content that exceeds  $\pm 10\%$  or 50 g.
- If the RONAL part number changes, a new material data sheet is required.

### 3.4.1 Substance disclosure in IMDS

All substances listed in the GADSL and/or Table 1 shall be reported in the IMDS. All substances identified in the GADSL and/or Table 1 of this regulation must be identified with the correct CAS number when being reported to IMDS. The use of substances that have not been identified according to CAS is permitted for the notification of substances in accordance with IMDS Recommendation 001.

Paints, polymers, adhesives, sealants, etc. must be reported in the cured state. The substances listed in the GADSL and/or Table 1 are not allowed to be reported as "confidential" when being reported to the IMDS.

### 3.4.2 Reporting on recycled Content

Only the weight of the recyclate within the component or assembly shall be declared as recycled content. Do not report the entire weight of the component or assembly as recycled content.

### 3.4.3 IMDS reporting requirements, including spare parts & accessories

All production parts, attachments including packaging must be reported.

## 4 Substance Restrictions

Below is the list of prohibited and/or restricted substances and regulations.

**Table 1 – List of restricted and/or prohibited substances**

Substance category / Substance name	Classification	Applications affected	Limits	Effective date
All GADSL listed Substances	D/P <sup>2</sup>	All materials are subject to the GADSL guidelines listed under <a href="http://www.gadsl.org">www.gadsl.org</a> .	see GADSL	Immediately
All forms of asbestos products, or -minerals	p <sup>3</sup>	All products and equipment (e.g. machines, Building).	not measurable	Immediately
Substances listed in EU REACH, Annex XIV	p <sup>3</sup>	All products and facilities.	The limit values mentioned in the list apply	Immediately
Regulation (EC) No 1907/2006 (REACH) – Candidate list SVHC (actual issue)	p <sup>3</sup>	All products, materials, mixtures and accessories.	The limit values mentioned in the list apply	Immediately
Conflict minerals including cobalt, gold, mica, tanta, tungsten, tin	D <sup>4</sup>	All products and components.	The mentioned limits apply	Immediately, are subject to declaration and proof of origin is required via <a href="#">Conflict Minerals Reporting Template</a> & <a href="#">Extended Minerals Reporting Template</a>
Per- and polyfluorinated alkyl compounds (PFAS)	D <sup>4</sup>	All products and components.	The limits specified in the list (SVHC / REACH) apply	Immediately
Chemical and Material marking with skull and crossbones	p <sup>3</sup>	All materials, fabrics and chemicals.	Marking	Define measures (incl. deadline) for the replacement of the substance or proof of the possibilities for the use of other products/substances.

Specified limit values of a substance contained in a homogeneous material, mixtures and chemicals	
D/P <sup>2</sup>	= <i>prohibited according to the GADSL list and must be declared in all other cases</i>
D <sup>4</sup>	= <i>subject to declaration</i>
p <sup>3</sup>	= <i>prohibited – measures including a deadline for replacing the substance must be defined</i>