

1.0 PURPOSE

The purpose for this procedure is to establish and maintain documented procedures to ensure that externally provided materials, parts, and products meet environmental requirements.

2.0 SCOPE

This specification outlines The Diemasters general requirements prohibiting or restricting certain chemical compounds as constituents of materials, parts, components, products and/or packaging purchased by or manufactured by The Diemasters.

The specification does not provide compliance assurance to the Suppliers relating to all global restricted substance requirements.

This specification is in addition to and does not in any way limit or supersede any other product or engineering specifications that may be established by The Diemasters. By accepting The Diemasters purchase order, vendor agrees that all materials, parts, components, products and/or packaging they provide are in compliance with this specification.

This specification includes references to Substances of Concern which are subject to change and are frequently updated by the European Commission.

3.0 REQUIREMENTS

All Suppliers to The Diemasters must ensure compliance to this specification. This specification applies to all materials, parts, components, products and/or packaging supplied either directly by the Supplier or indirectly through sub-suppliers. The content restrictions and/or notification requirements specified below also apply to all materials purchased by The Diemasters or used in packaging. Table 1 "Substance Restrictions from Use in Products" lists the content restrictions that apply to the specified compound as constituents of all parts, whole goods or packaging purchased by The Diemasters.

4.0 MATERIAL DECLARATION AND NOTIFICATION PROCEDURES:

The supplier or authorized subcontracted supplier shall complete the QP-8.4.1.2-IATF compliance verification:

1. Prior to a purchase order being issued by The Diemasters as part of the New Supplier Set up process. QP-8.4.1.2-IATF compliance verification is also a part of the initial PPAP before production commences.
2. On a regular frequency (no less than biannually) The Diemasters will initiate requests to verify compliance for every material, parts, components, products and/or packaging being supplied to or developed for The Diemasters or;
3. At the time a material, parts, components, products and/or packaging is subject to revision or;
4. When this QP-8.4.1.2-IATF spec is revised.

If the materials, parts, components, products and/or packaging being supplied to or developed for The Diemasters does not meet one or more of the requirements, as set forth in this specification, the supplier or authorized subcontracted supplier shall immediately notify the appropriate The Diemasters buyer and/or commodity manager. This notification shall also be

made if the supplier or his authorized sub-contracted supplier makes changes in its operations that will cause any part, whole good or packaging to no longer comply with this The Diemasters specification.

All suppliers of articles (materials, parts, components, products and/or packaging) to The Diemasters shall:

1. On request from purchasing department, report conformity to the QP-8.4.1.2-IATF specification.
 - a. The Restriction of Hazardous Substances (RoHS) restrictions are at the "homogeneous material" level which means that the limits apply to all components and any single material that could (theoretically) be separated mechanically (for example, the sheath on a cable or the tinning on a component lead).
 - b. Conformity to this QP-8.4.1.2-IATF specification includes the notification requirements (per REACH Article 33) of substances that are on the Substances of Very High Concern (SVHC) candidate list, specifically for substances that may be present above 0.1% of the part and/or component.
 - c. Conformity to this QP-8.4.1.2-IATF specification includes the ban or restriction on substances found in REACH Annex XVII (Restrictions List).
 - d. Conformity to this QP-8.4.1.2-IATF specification includes the notification requirements (per GADSL) of substances that are on the that may be present above 0.1% of the part and/or component.
2. Provide contact information for the person within the supplier's organization who is responsible for relevant chemical legislation (RoHS / REACH/ GADSL / other).
3. Observe changes in The Diemasters Corporation's QP-8.4.1.2-IATF specification and update the declaration of compliance associated with potential changes.
4. Observe changes made to the Candidate List in the RoHS, REACH and GADSL regulations and inform The Diemasters of any changes concerning new substances which influence the supplier's responsibilities to notify or eliminate substances contained in materials.
5. Be aware that The Diemasters may impose upon the supplier that the supplier provides 3rd party accredited laboratory test documentation upon request to prove conformance to QP-8.4.1.2-IATF.
6. Be aware that The Diemasters may select parts for unannounced testing for QP-8.4.1.2-IATF verification.
7. Supplier shall bear full responsibility for providing additional documentation to QP-8.4.1.2-IATF (e.g. full material disclosure, test reports, product or material declarations, safety data sheets and labelling according GHS/CLP), demonstrating the amount of restricted substances are within allowable limits as set forth by the applicable regulation(s).
8. Any discrepancies to QP-8.4.1.2-IATF and/or regulations must be reported in advance of parts/components delivery to The Diemasters to determine acceptance.

5.0 ENFORCEMENT OF QP-8.4.1.2-IATF

If any of the materials, parts, components, products and/or packaging being supplied to or developed for The Diemasters contains substances or materials that are banned or restricted in concentrations above the allowable limits or application, The

Diemasters may enforce the terms and conditions of its agreement with the supplier, including but not limited to penalties and/or termination of business.

6.0 REFERENCES / REGULATIONS

- 6.1.** The Restriction of Hazardous Substances (**RoHS**) by European Union Directive 2011/65/EU, amendments and Delegated Directive's: https://ec.europa.eu/environment/waste/rohs_eee/legis_en.htm
- 6.2.** European Union Regulation EC 1907/2006, Registration, Evaluation, Authorization and Restriction of Chemical Substances (**REACH**) and all amendments: <https://echa.europa.eu/regulations/reach/understanding-reach>.
- 6.2.1.** The **REACH restricted list** is a list of chemicals by art. 67 and Annex XVII which are NOT ALLOWED above the specified limits as stand-alone chemical substances, in chemical preparations (e.g. paint) and/or in articles. The chemical limits in Annex XVII are subject to how the material may be used. REACH Restrictions (annex XVII) are found: <https://echa.europa.eu/en/substances-restricted-under-reach>
- 6.2.2.** The **REACH authorization list** is a list of chemicals contained in Annex XIV which are NOT ALLOWED to be used or supplied as such or in mixtures (e.g. paint) unless an authorization is granted in the supply chain for that specific use. See: <https://echa.europa.eu/authorisation-list>
- 6.2.3.** The **REACH candidate list** is a list of chemicals that meet the criteria of "substances of very high concern (SVHC)" defined in REACH article 57. Connected to this list is a requirement for companies to provide information to customers concerning the presence of these substances in articles (products and parts thereof) above 0.1 %w/w. The candidate list is published on the home page of the European Chemicals Agency REACH Candidate List: <https://echa.europa.eu/candidate-list-table>. Additionally, by the 5th of January 2021, every supplier of a product is **obliged** to provide the SVHC information within the **SCIP database** of the European Chemicals Agency (ECHA) in accordance with Article 33 (1) of Regulation (EC) No. 1907/2006. Every supplier is obliged to provide relevant information (such as SCIP reference number) on request. See: <https://echa.europa.eu/scip>
- 6.3.** Global Automotive Declarable Substance List (**GADSL**) is a list including substances used in automotive parts containing possible harmful substances and defining those by limit values. The GADSL is the result of worldwide efforts of industry to harmonize the communication and exchange of information regarding the application of harmful substances with regard to the coming decades. The GADSL aims at simplifying the recycling of the product after its service life. See: <http://www.gadsl.org>

- 6.4. Persistent Organic Pollutants (POP)** by (EU) 2019/1021 regulates manufacturing, market introduction and use of POP in mixtures and products. The substance restrictions must be observed for all products. See: <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32019R1021>. In addition, regulation (EU) 2020/784 adds restrictions of PFOA compounds, see <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32020R0784>
- 6.5. California Proposition 65** is the amended version of the California Safe Drinking Water and Toxic Enforcement Act 1986. It requires the disclosure if a material, product, spare part, or mixture contains a substance on the Proposition 65 list. See: <https://oehha.ca.gov/proposition-65/proposition-65-list>
- 6.6. Packaging** and packaging waste legislation:
- 6.6.1.** EU directive 94/62/EG:
<https://ec.europa.eu/environment/waste/packaging/legis.htm>
- 6.6.2.** U.S.A. Toxics in Packaging Legislation
- 6.7.** European Union Directive **2006/66/EC on batteries and accumulators** and waste batteries and accumulators (**Battery directive**):
<https://ec.europa.eu/environment/waste/batteries/legislation.htm>
- 6.8.** PAH chemical requirements set out in the German Safety (GS) requirements. The German AfPS GS 2019:01 PAK (**German Product Safety Act**) has adopted allowable exposures of certain chemicals depending on the part that is contacted by the consumer and the exposure time, see:
https://www.baua.de/DE/Aufgaben/Geschaeftsfuehrung-von-Ausschuessen/AfPS/pdf/AfPS-GS-2019-01-PAK-EN.pdf?__blob=publicationFile&v=5
- 6.9. Restriction of Conflict Minerals** defined as tantalum, tin, tungsten and gold and their derivatives, as well as the metal ore from which any of these minerals are extracted in the Democratic Republic of the Congo.

TABLE 1: SUBSTANCE RESTRICTIONS FROM USE IN PRODUCTS

The suspect substances are classified into the following categories:

- 1. Banned:** Substances that shall not be present in any products
- 2. Restricted:** Restricted Substances shall not be present, although exemptions may apply
- 3. Substances of Concern (SoC):** listed because they generate concern now or may do so in the future

When a substance belongs to several groups with different suspect substances classifications, the most stringent classification applies. In the case a restricted substance under exemptions or substance of concern are used in the material/part supplied to The Diemasters the supplier shall inform The Diemasters of its presence and % weight by weight of its homogeneous material (RoHs) or article (REACH).

Substance	Classification	Application Restriction	Restriction Threshold	Regulatory Driver
Asbestos	Banned	All products	-	REACH regulation no.1907/2006
REACH Candidate List Substances of Very High Concern (SVHCs) Article 59	Restricted unless reported (SoC)	All products, batteries, and packaging	Substances included in the candidate list must be reported if present >0.1% w/w in any part. Without prior declaration, supply is not allowed.	REACH regulation no.1907/2006 Article 59 and 33
REACH Authorization List Substances Subject to Authorization in REACH Annex XIV	Banned	All substances and mixtures (products not fulfilling the REACH "article" definition) like fluids, aerosols such as oils, cleaners, glues etc.	-	REACH regulation no.1907/2006 Annex XIV
REACH Restricted list Substances listed in REACH ANNEX XVII	Restricted	All products	See for applicable thresholds per substance the relevant entry in REACH annex XVII	REACH regulation no.1907/2006 Annex XVII
Sum of 15 Polycyclic Aromatic Hydrocarbons for GS-Certification (PAHs)	Restricted	All parts of products that require human touching for normal operation	< 50 mg/kg for skin contact up to 30 sec., < 10 mg/kg for skin contact greater than 30 sec.	GS-Certification
Sum of Phenanthrene, Pyrene, Anthracene and Fluoranthene	Restricted	All part of products that require human touching for normal operation	< 50 mg/kg for skin contact up to 30 sec., < 10 mg/kg for skin contact greater than 30 sec.	GS-Certification
Benzo(a)pyrene	Restricted	All parts of products that require human touching for normal operation	<1 mg/kg for skin contact up to 30 sec., <0.5 mg/kg for skin contact greater than 30 sec.	GS-Certification
Benzo(a)anthracene	Restricted	All part of products that require human touching for normal operation	<1 mg/kg for skin contact up to 30 sec., <0.5 mg/kg for skin contact greater than 30 sec.	GS-Certification
Benzo(e)pyrene	Restricted	All parts of products that require human touching for normal operation	<1 mg/kg for skin contact up to 30 sec., <0.5 mg/kg for skin contact greater than 30 sec.	GS-Certification
Benzo(b)fluoranthene	Restricted	All parts of products that require human touching for normal operation	<1 mg/kg for skin contact up to 30 sec., <0.5 mg/kg for skin contact greater than 30 sec.	GS-Certification

Benzo(j)fluoranthene	Restricted	All parts of products that require human touching for normal operation	<1 mg/kg for skin contact up to 30 sec., <0.5 mg/kg for skin contact greater than 30 sec.	GS-Certification
Benzo(k)fluoranthene	Restricted	All parts of products that require human touching for normal operation	<1 mg/kg for skin contact up to 30 sec., <0.5 mg/kg for skin contact greater than 30 sec.	GS-Certification
Benzo(g,h,i)perylene	Restricted	All parts of products that require human touching for normal operation	<1 mg/kg for skin contact up to 30 sec., <0.5 mg/kg for skin contact greater than 30 sec.	GS-Certification
Cadmium and its Compounds	Restricted	All Products	0.01%	EU RoHS
		Batteries	20 ppm	2006/66/EC Battery Directive
		Packaging	0.01% (sum of Pb + Cd + Hg + Cr6+)	94/62/EC Packaging Directive
Chromium, Hexavalent (Cr6+) Compounds	Restricted	All Products	0.10%	EU RoHS
		Packaging	0.01% (sum of Pb + Cd + Hg + Cr6+)	94/62/EC Packaging Directive
Chrysene	Restricted	All parts of products that require human touching for normal operation	< 1 mg/kg for skin contact up to 30 sec., < 0.5 mg/kg for skin contact greater than 30	GS-Certification
Dibenzo(a,h)anthracene	Restricted	All parts of products that require human touching for normal operation	< 1 mg/kg for skin contact up to 30 sec., < 0.5 mg/kg for skin contact greater than 30	GS-Certification
Indeno(1,2,3-cd)pyrene	Restricted	All parts of products that require human touching for normal operation	< 1 mg/kg for skin contact up to 30 sec., < 0.5 mg/kg for skin contact greater than 30	GS-Certification
Mercury and its Compounds	Restricted	All Products	0.10%	EU RoHS
		Packaging	0.01% (sum of Pb + Cd + Hg + Cr6+)	94/62/EC Packaging Directive
		Batteries	5 ppm	2006/66/EC Battery Directive

Naphthalene	Restricted	All parts of products that require human touching for normal operation	< 10 mg/kg for skin contact up to 30 sec., < 2 mg/kg for skin contact greater than 30 sec.,	GS-Certification
Lead and its Compounds	Restricted	All products, except steel alloys, aluminum alloys and copper alloys	0.10%	EU RoHS
		Packaging	0.01% (sum of Pb + Cd + Hg + Cr6+)	94/62/EC Packaging Directive
Lead in Steel Alloys	Restricted	Steel alloy for machining purposes and galvanized steel containing lead	0.35%	EU RoHS
Lead in Aluminum Alloys	Restricted	Aluminum alloys	0.40%	EU RoHS
Lead in Copper Alloys	Restricted	Copper alloys	4.00%	EU RoHS
Polybrominated Biphenyls (PBB)	Restricted	All products	0.10%	EU RoHS
Polybrominated Diphenyl Ethers (PBDE)	Restricted	All products	0.10%	EU RoHS
Bis(2-Ethylhexyl) Phthalate (DEHP)	Restricted	All products	0.10%	EU RoHS REACH annex XVII
Benzyl Butyl Phthalate (BBP)	Restricted	All products	0.10%	EU RoHS REACH annex XVII
Dibutyl Phthalate (DBP)	Restricted	All products	0.10%	EU RoHS REACH annex XVII
Diisobutyl Phthalate (DIBP)	Restricted	All products	0.10%	EU RoHS REACH annex XVII

All other Brominated Flame Retardants not limited to: DBBT; DecaBDE; Diphenyl Octabromederivate; Tris 2,3, Dibromopropyl Phosphate; n-Propyl Bromide	Banned / Restricted	All products (flame retardant in plastics and textiles)	-	EU RoHS REACH annex XVII POP regulation (EU) 2019/1021
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Short Chain Chlorinated Paraffins (SCCPs)	Restricted	All products	0.15%	POP regulation (EU) 2019/1021
Hexabromocyclododecane (HBCDD)	Restricted	All Products	100 ppm	POP regulation (EU) 2019/1021
Hexachlorobenzene	Banned	All Products	-	POP regulation (EU) 2019/1021
Hexachlorobutadiene	Banned	All Products	-	POP regulation (EU) 2019/1021
Mirex	Banned	All Products	-	POP regulation (EU) 2019/1021
Pentachlorobenzene	Banned	All Products	-	POP regulation (EU) 2019/1021
Perfluorooctane sulfonic acid & derivatives (PFOS)	Restricted	All Products	1000 ppm	POP regulation (EU) 2019/1021
Perfluorooctane acid, derivatives, and related compounds (PFOA)	Restricted	All Products	0.025 ppm (1 ppm related compounds)	POP regulation (EU) 2020/784
Polychlorinated Biphenyls (PCBs)	Banned	All Products	-	POP regulation (EU) 2019/1021
Polychlorinated Naphthalenes (PCNs)	Banned	All Products	-	POP regulation (EU) 2019/1021

TABLE 2: ARTICLES REQUIRING 3RD PARTY TEST DOCUMENTATION

The supplier of articles considered to be at high risk of containing substances restricted under RoHS, the German Product Safety Act, or other National Regulations shall provide a test report from an ISO 17025 accredited third-party laboratory.

In some cases, an article may contain above the banned substance is used in a manner exempted by the regulation. Where applicable, the supplier of the article shall provide the specific exemption used per the applicable regulation and the expiry date of the exemption.

Component	Applicable Regulation(s)
Seals	RoHS & PAHS
O-Rings	RoHS & PAHS

Non-Metallic Gaskets	RoHS, PAHs, & Asbestos
Metallic Gaskets	RoHS & PAHs
Filters & Filter Assemblies	RoHS & PAHs
Belts	RoHS, PAHs, & Asbestos
Hoses	RoHS & PAHs
Insulated Cables and Wires	RoHS & PAHs
Caps	RoHS & PAHs
Foam	RoHS & PAHs
Primer Bulb	RoHS & PAHs
Labels/Decals	RoHS & PAHs
Handles	RoHS & PAHs
Wire Sleeves	RoHS & PAHs
Sensor Modules/Assemblies	RoHS
Protective Sleeves for Wires & Hoses	RoHS
Stator Assemblies	RoHS & PAHs
Flywheel Magnets	RoHS
Metallic Engine Covers	RoHS
Non-Metallic Engine Covers	RoHS & PAHs
Frame	RoHS
Bearing Inserts	RoHS
Starter Rope	RoHS & PAHs
Fuel Tanks & Associated Parts	RoHS & PAHs
Lubricants	RoHS & PAHs
Crank Shafts	RoHS



Description: Environmental Requirements for Materials, Parts & Products

Procedure: QP-8.4.1.2-IATF

Department: Purchasing

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Chain Brakes	RoHS
Outlets	RoHS, REACH, & PAHs
Switches	RoHS & PAHs
Pulleys	RoHS
Clutch	RoHS & Asbestos
Epoxies, Adhesives & Glues	RoHS & PAHs

REVISION RECORD

Rev.	Paragraph / Changes	Date	Issued by	Approved by
A	Initial Document (Original)	05/27/2021	Jit Mistry	Jit Mistry