



What has made us strong in the analog world,
makes us even stronger in the digital world.
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Material Compliance – Topics – 12/2022


Aim of this information is to draw awareness at all our suppliers on the topic Material Compliance in general

Conflict Minerals



Mining of Conflict Minerals is often accompanied with inhumane activities. To limit this, it is necessary according to the Schaeffler Conflict Minerals Policy to use only material from certified smelters that are evaluated by independent experts at regular intervals.

 The topic of conflict minerals is primarily concerned with the observance of human rights, and is essentially concerned with the avoidance of warlike activities in the Democratic Republic of Congo and adjoining countries. In these areas, the mining of chemical elements such as Gold, Tungsten and Tantalum, as well as Cobalt and Mica, finances these warlike activities.

 In 2022 the smelter African Gold Refinery was not certified furthermore and it appeared on the sanction list of the US Government, so Schaeffler requests all its suppliers to ensure again that no materials are used that originate from critical smelters. If no sustainable remedial action is taken, we reserve the right to impose New Business on Hold.

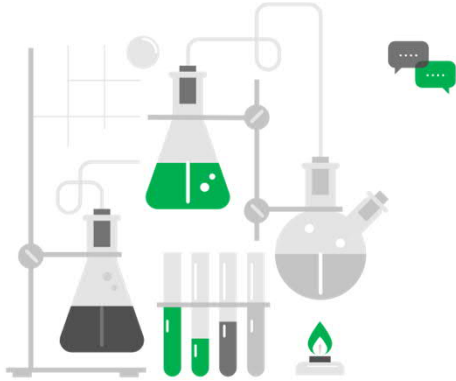
Please look out carefully to not longer certified Russian smelters in 2022, since many of them lost their certifications.

Conflict Minerals

Please find enclosed a example list (situation 11/22) with critical smelters including reasons for this assessment. This list has to be seen as an example, not finalized and might change dynamic due to changing sanctions, changing certifications or other reasons.

- CID003185 Gold African Gold Refinery - Uganda - Refinery not participating in OECD aligned audit. Gold processed in Uganda, a covered country as per Dodd Frank 1502.
- CID002515 Gold Fidelity Printers and Refiners – Zimbabwe- Relations with Sino Zimbabwe which is under US Treasury Sanctions
- CID002563 Gold Kaloti Precious Metals – UAE - Removed from Dubai Good Delivery list in 2015. Publicly available information – April 2020 ; October 2020
- CID002587 Gold Tony Goetz NV – Belgium - SOR not able to confirm to the RMI (RMAP) standards . Public Reports
- CID002567 Gold Sudan Gold Refinery – Sudan - U.N. Security Council concerns over gold smuggling in Sudan
- CID000927 Gold JSC Ekaterinburg Non-Ferrous Metal Processing Plant - Russian Federation - Ownership with Renovo group – US Treasury Sanctions
- CID001029 Gold Kyrgyzaltyn JSC - KYRGYZSTAN - Kyrgyzaltyn JSC Suspended from LMBA Good Delivery List

New version of S132030-1



For technical questions regarding S 132030-1, e.g.: like with filling the document, please contact Schaeffler via this email address: MaterialCompliance@schaeffler.com

For IMDS reporting (Appendix B), please contact Schaeffler via this email address: IMDS@schaeffler.com



The latest news you can find on the internet:
Prohibited and declarable substances:
[Sustainability | Schaeffler Germany](#)



Main changes in the new version are:

- There is a separate excel sheet for each category (A, B and C).
- The list of substances is shortened.
- Please be aware of your responsibility to inform us about changes in Material Composition or due to new legal aspects

PFAS (Per- and Polyfluorinated Alkyl Substances) – Planned bans for EU and US



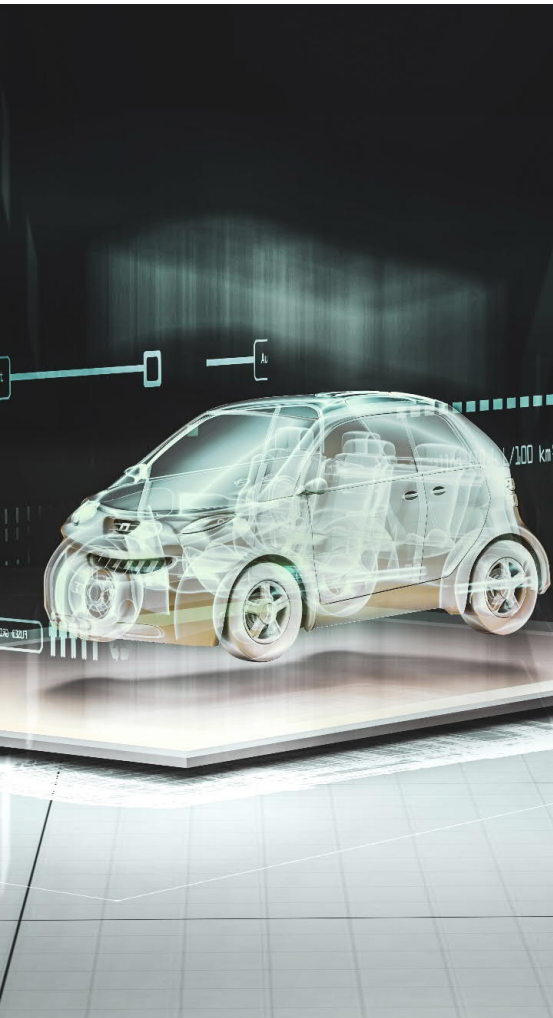
More than 8000 substances are affected. Schaeffler uses PFAS in many products for industry and automotive. PFAS are essential for our Green Deal products (**fuel cell, electrolyser and wind energy products**).



Material Compliance participates in several committees (BDI, VD; VDMA, ...) in order to get actual information and to exchange about necessary applications.



More and more PFAS substances are subject to restrictions. In this content, **all PFAS must be declared for all purchased products in the new version of S 132030-1**. With this information, Schaeffler can react more quickly if restrictions affect Schaeffler products. Here you can find actual restrictions for PFAS: [PFAS](#)



One of the biggest responsibilities of companies supplying products to the automotive industry is to ensure that the product placed on the market meets all legal requirements in terms of Material Compliance, during its life cycle. With IMDS (International Material Data System), we can track all changes to a product's ingredients, meeting the obligations imposed on automobile manufacturers by national and international standards, laws and regulations.



Therefore, we want to kindly remind you that, when the GADSL or SVHC list is updated, all MDS that have a joker/wildcard in their tree structure must be reviewed to determine whether the substance that the joker/wildcard replaces is now declarable(D) or prohibited (P). All substances marked as confidential must undergo the same review to identify whether a confidential substance is now D/P. In the case of, a revised MDS with a full non-confidential disclosure of the D/P substance is required by the date specified in the legislation. If no date is indicated or if the date is more than 6 months, the resubmission must take place no later than 6 months from the date of publication of the updated GADSL.



Schaeffler strongly recommends that substances should be marked as confidential, rather than using the joker/wildcard for highly confidential substance information, so that the reviewing process after a legislative change takes less time and effort.

We expect all our suppliers to be aware of this responsibility and together to ensure that our products meet all the requirements of the automotive industry in terms of Material Compliance!



REACH / RoHS

 For general questions regarding REACH/RoHS, please contact Schaeffler via this special email address:

REACH-RoHS@schaeffler.com

 For the latest news and updates, please follow the official channels:

- REACH : <https://echa.europa.eu/>
- RoHS: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011L0065-20210401>



In case of no information from your side we will consider that the declarations of compliance previous received, are still valid.

SCHAEFFLER

Material Compliance Contact Information



For general questions related to Material Compliance topics, please contact us at MaterialCompliance@schaeffler.com

For specific topics, please contact us on the dedicated mailboxes:

REACH/RoHS - REACH-RoHS@schaeffler.com

IMDS – IMDS@schaeffler.com

Conflict Minerals – ConflictMinerals@schaeffler.com

News on RoHS Directive



Because Schaeffler has committed to offer safe and compliant products, various Material Compliance requirements must be passed down the supply chain. Please take over your responsibility by requesting necessary information from your suppliers as well and inform Schaeffler about regulated substances in products you provide.

RoHS Directive 2011/65/EU restricts the use of some specific hazardous substances in electrical and electronic equipment (EEE). Also, Schaeffler customers require RoHS information and compliance, even if the provided product is not an EEE.

Currently, the European Commission wants to add two new substances to the ten ones already regulated by RoHS. Please be prepared to inform Schaeffler timely, if those new substances maybe contained in products you provide.



Let's explore two substances expected to be restricted already in the fourth quarter of 2022, subject to a final decision by the European Commission:

Tetrabromobisphenol A (TBBP-A), CAS Number 79-94-7, can be used as a flame retardant in polymers and is suspected to be reprotoxic, persistent, bioaccumulative and toxic (PBT/vPvB) and a potential endocrine disruptor.

Medium Chain Chlorinated paraffins (MCCPs), are a group of substances which are, related to RoHS, described by one CAS number 85535-85-9. MCCPs can be used as secondary plasticizer in PVC or as flame retardants in polymers, rubber, paints and adhesives. They are suspected to be persistent, bioaccumulative and toxic (PBT/ vPvB). MCCPs are already declarable under the REACH regulation, because they are considered as Substances of Very High Concern and therefore listed on the SVHC Candidate List.

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