

## **Guidelines for suppliers of EBG electro GmbH regarding material conformity**



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## Change history

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## Preface

This guideline outlines the requirements of EBG electro GmbH regarding regulatory provisions and presents material- and substance-related obligations. Suppliers of EBG electro GmbH are required to provide specific information.

The purpose of this guideline is to codify the company's policies on corporate responsibility in the context of sustainable development, environmental protection, and health and safety, while incorporating the United Nations Sustainable Development Goals.

## 1 General Information

This guideline defines substances prohibited or subject to declaration in products (see section 3.1), along with the associated information obligations. This includes auxiliary and operating materials, if they remain with the product or are classified as hazardous substances, as well as packaging and transport materials delivered to the customer with the product.

To ensure the lawful placing of their products on the market, EBG electro GmbH requires from its suppliers full compliance of all purchased items, products, and traded goods with the relevant regulations and requirements outlined in this guideline. Suppliers must proactively fulfill all information obligations arising from regulatory requirements and internal EBG electro demands.

Compliance with this guideline is the responsibility of the supplier. However, the supplier's legal and regulatory obligations remain unaffected by the requirements of this guideline.

EBG electro GmbH must be provided with the technical, safety (SDS), and regulatory (RDS) data sheets for all products/items purchased. EBG electro GmbH reserves the right to carry out individual inspections and laboratory tests if necessary.

The currently valid version of this guideline is made available on the homepage <https://www.EBG-electro.com/>. Suppliers are required to regularly verify the current version..

Any new version of this guideline becomes effective immediately upon publication on the EBG electro GmbH homepage and supersedes the previous version. No separate notification of updates will be issued by EBG electro GmbH.

Changes in legislation do not automatically lead to an update of this guideline but do not relieve the supplier of the obligation to take such changes and/or new regulations into account.

Suppliers are obliged to provide the required information free of charge.

The supplier must inform EBG electro GmbH in a timely manner of any consequences or product changes resulting from new or amended legal requirements. This applies in particular when new substance regulations take effect or when deadlines for existing exemptions expire.

## 2 Scope of application

The following regulatory requirements apply to all suppliers and their supplied goods. Suppliers are fully obligated to meet the listed requirements.

In addition to the obligations in this guideline, other regulatory requirements may exist that must be met independently of this document.

## 2.1 Regulation (EG) No. 1907/2006 (REACH)

EU regulation for the harmonization of chemicals legislation, under which only registered chemicals may be placed on the market.

Annex XIV: List of substances subject to authorization (requires specific authorization for listed substances – prohibition subject to approval).

Annex XVII: List of restricted substances (restrictions on the use of certain hazardous substances).

Information obligation under Article 33: If an article contains a Substance of Very High Concern (SVHC) in a concentration greater than 0.1% (w/w).

Suppliers of EBG electro GmbH are obligated to report if a delivered item contains any SVHC from the current version of the ECHA Candidate List (updated twice a year). The name of the substance must be provided (at a minimum).

## 2.2 Directive 2011/65/EU (RoHS)

Directive on the restriction of certain hazardous substances in electrical and electronic equipment, with specified maximum concentration limits. The consolidated version of the directive is implemented in Germany through the Elektro- und Elektronikgeräte-Stoff-Verordnung (ElektroStoffV).

RoHS exemptions allow the temporary use of certain regulated substances for specific applications.

If exemptions are used by the supplier, the supplier must notify EBG electro GmbH for the respective product.

Suppliers are encouraged to proactively monitor expiry dates of exemptions and notify EBG electro GmbH of any bans and propose alternative compliant materials/products for substitution after the exemption expires.

## 2.3 Directive 2012/19/EU - WEEE 2

Directive on the placing on the market, take-back, and environmentally sound disposal of electrical and electronic equipment, implemented in Germany through the ElektroG.

Suppliers must inform EBG electro GmbH if their products contain substances requiring specific treatment during disposal (e.g., halogenated flame retardants in plastics, heavy-metal-containing additives).

## 2.4 Directive 94/62/EC / Packaging and Packaging Waste Regulation

These regulations set requirements for the handling of packaging and packaging waste within the European Union.

EBG electro GmbH prioritizes packaging designed for maximum environmental and resource efficiency, with focus on material composition, reusability, and recyclability.

## 2.5 Regulation (EG) Nr. 1021/2019 (POP)

This regulation governs the prohibition and restriction of the production, placing on the market, and use of persistent organic pollutants.

EBG electro GmbH requires a supplier declaration regarding compliance with this regulation.

## 2.6 Regulation (EU) Nr. 2017/821 (Conflict minerals)

Defines due diligence obligations in the supply chain for EU importers of tin, tantalum, tungsten, their ores, and gold from conflict-affected and high-risk areas.

EBG electro GmbH requires a due diligence statement from its suppliers verifying certification of smelters or country of origin of the minerals.

## 2.7 TSCA (Toxic Substances Control Act)

EBG electro GmbH requires a declaration from its suppliers regarding the status of delivered products/items/materials under the EPA (Environmental Protection Agency) TSCA regulation concerning the following substances:

- decabromodiphenyl ether (DecaBDE), CAS # 1163-19-5
- phenol isopropylatedphosphate (3:1) (PIP(3:1), CAS # 68937-41-7
- 2,4,6-Tris(tert-butyl)phenol (2,4,6-TTBP), CAS # 732-26-3
- hexachlorobutadiene (HCBD), CAS # 87-68-3
- pentachlorothiophenol (PCTP), CAS # 113-49-3

## 2.8 California Proposition 65

EBG electro GmbH requires a declaration from suppliers regarding substances listed under California Proposition 65 that are contained in supplied products/items/materials.

## 2.9 Halogen-free

EBG electro GmbH aims to reduce or eliminate the use of halogens.

Therefore, suppliers must provide a halogen-free declaration, based on the following threshold values in accordance with IEC 61249-2-21:

- 900 ppm Chlor
- 900 ppm Brom
- 1.500 ppm Halogene gesamt

## 2.10 Silicone-free (LBS freedom: substances that interfere with paint wetting)

EBG electro GmbH requires a confirmation from suppliers regarding the use of substances interfering with paint wetting (including silicones) within their process chains.