



neways

Neways Electronics International N.V.

Material Compliance Policy

This policy applies to Neways Electronics International N.V., its direct or indirect, wholly- and majority-owned subsidiaries (**Neways or Company**) and their directors, officers, full-time, part-time, and seconded employees (**Personnel**). This policy applies in all countries in which Neways operates or conducts business. When the laws of those countries require a higher standard, such standard shall apply.

Purpose

Neways acts as a technology innovation partner to various international customers and is therefore required to comply with several environmental and material specific requirements arising from international laws, standards, and guidelines. We regularly evaluate relevant legislation and customer requirements and integrate them into our processes where appropriate.

In addition, we want to reduce the impact on the environment and limit the use of hazardous substances in electrical and electronic equipment and therefore we are committed to continuously improving our material compliance strategy. Our aim is to engage relevant business partners, such as customers and suppliers, in our environmental efforts and to keep our supply chain well informed.

Scope

Material Compliance refers to compliance with environmental and material-specific requirements resulting from international laws, standards, and guidelines. The material requirements cover chemical substances, purchased parts, packaging and materials used in the manufacturing processes and in the products.

Neways markets its products to different industries and is therefore subject to various applicable international laws and regulations including, but not limited to:

European	International
<ul style="list-style-type: none"> • RoHS-Directive 2011/65/EU • REACH-Regulation (EC) NO. 1907/2006 • Waste Frame Directive and SCIP database • Persistent organic pollutants Regulation (EU) 2019/1021 • Packaging and Packaging Waste Directive 94/62/EC 	<ul style="list-style-type: none"> • Directive 2000/53/EC on end-of life vehicles and GADSL • California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986) • U.S. Toxic Substances Control Act 1976 • U.S. Dodd-Frank-Act - Conflict Minerals

Neways’ Contribution on the Chemicals Strategy for Sustainability Towards a Toxic-Free Environment

Chemicals are everywhere in our daily life, used in many ways at Neways and essential to our business. The following Neways’ approach prioritizes protecting human health and the environment from chemical risks, while also supporting Personnel, suppliers and customers in sustainability and the complex topic of material compliance.

Neways' approach

Material compliance is related to the product and refers to the process of ensuring that products meet legal and regulatory requirements in the target market of our customers. This means that material compliance is as important to Neways as any other product feature. Neways ensures compliance with relevant material compliance legislation and provides due diligence by:

Assessment of global legislation and customer requirements

Neways Material Compliance Officers regularly review global legislation and customer requirements to ensure that Neways complies with all material requirements. Regular communication with customers, suppliers and other professionals on the development and understanding of material compliance is essential to our business. This enables us to adapt our standards, procedures, and policies as we gain new knowledge. In addition, where risks arise from changes, we will collaborate with our customers and/or suppliers to minimize these risks and ensure a sustainable supply chain.

Implementing Material Compliance Standards, Procedures and Guidelines

To ensure the various material compliance obligations at Neways, we have embedded material compliance at various organizational levels with clear roles and responsibilities supported by standards, procedures, and guidelines. In addition, material compliance requirements are part of our product documentation and our supplier management.

Integrating Material Compliance Data in the Product Lifecycle Management System

We are committed to report and monitor Neways' material compliance efforts. Our product lifecycle management enables us to report and monitor the data required for material compliance, which is linked to our product data, creating transparency throughout the product life cycle. We improve the required data quality by using external international product databases and involving our suppliers directly.

Involvement of our Suppliers and Customers

We are committed to consult with stakeholders on material compliance topics. Additionally, we expect all suppliers to assess the materials and components they supply against regulatory requirements. To assist our suppliers in understanding our expectations, we have summarized them in our 'Supplier Material Compliance Guidance'. The latest version can be found on our governance website <https://newayselectronics.com/governance/> and will be periodically updated.

Training and Awareness

Our Personnel receive regular training and updates on material compliance to ensure they stay up to date with legislation and customer requirements. The training is tailored to everyone's role and area of responsibility, ensuring a comprehensive understanding of the complex and varied material compliance requirements. In addition, we conduct regular audits of our material compliance processes and improve our procedures where necessary. This combination enables our Personnel to understand how their daily activities contribute to our Material Compliance obligations and how they can improve them. The training material is centrally accessible to all Personnel.

Safe Working Environment

Integrating chemical substance data with our product data allows us to monitor the presence of substances of concern throughout the product lifecycle. This ensures the availability of

information on chemical content and safe use, which is crucial for maintaining a safe working environment and minimizing and substituting harmful substances whenever possible.

Material Compliance Roles and Responsibilities

We are committed to working closely together to maintain consistency. By clearly defining the following roles, we establish a robust framework that helps us follow the Neways' approach, promotes efficiency, regulatory adherence, and customer satisfaction.

Policy Compliance (QESH)

The Quality, Environment, Safety, and Health (QESH) team ensures compliance with current and future regulations. Their responsibilities include:

- Maintaining the material compliance policy and providing communication and training.
- Ensure due diligence of global material compliance legislation and customer requirements.
- Adapting the organization to updated compliance requirements.
- Collaborate with regulatory bodies, customers and suppliers and other relevant stakeholders.

Process Execution & Management (ENG)

The Engineering (ENG) team is accountable for the efficient execution and effective management of our material compliance procedures. Their responsibilities include:

- Integration and updating of material compliance requirements into the engineering procedures.
- Management of material compliance data, interfaces, and automation in the PLM system.
- Material compliance product assessment and reporting to relevant stakeholders (e.g., customers and the ECHA).

Procurement (PROC)

The Procurement (PROC) enforcing Material Compliance at our suppliers by monitoring adherence to established guidelines and policies. Their responsibilities include:

- Evaluating suppliers for compliance with 'Material Compliance' legislation during the selection and release process.
- Incorporating clauses in supplier agreements to ensure adherence to material compliance legislation.
- Sharing the "Supplier Material Compliance Guidance," which outlines the requirements.

Annex I - Definitions

The following words used in this Material Compliance Policy and shall have the following meaning:

“ECHA”	European Chemical Agency Link: Homepage - ECHA (europa.eu)
“GADSL”	The Global Automotive Declarable Substance List (GADSL) is published by the automotive, automotive parts supplier and chemical industries to facilitate communication and exchange of information regarding the use of certain substances in automotive products throughout the supply chain. Link: https://www.gadsl.org/
“PLM”	Product Lifecycle Management
“Product”	All Neways products are complex products, consisting of individual articles and a product packaging.
“QESH”	Quality Environmental Safety and Health
“REACH”	REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals. Link: REACH Legislation - ECHA (europa.eu)
“RoHS”	RoHS stands for Restriction of Hazardous Substances in Electrical and Electronic Equipment Link: Directive - 2011/65 - EN - (europa.eu)
“SCIP”	SCIP is the database for information on Substances of Concern In articles as such or in complex objects (Products) established under the Waste Framework Directive (WFD) Link: SCIP-Database - ECHA (europa.eu)

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