



neways

Neways Electronics International N.V.

Supplier

Material

Compliance

Guidance

Contents

LIST OF TABLES	1
1 PURPOSE	2
2 SUPPLIER REQUIREMENTS	2
3 DEFINITIONS (FOR CLARITY; OTHER DEFINITIONS ARE AS PER SFA)	3
4 SCOPE OF APPLICATION	3
5 EUROPEAN SUBSTANCE REGULATIONS AND PROHIBITIONS	4
5.1 ROHS DIRECTIVE 2011/65/EU	4
5.2 REACH REGULATION (EC) NO. 1907/2006.....	5
5.3 WASTE FRAMEWORK DIRECTIVE AND SCIP DATABASE.	6
5.4 PERSISTENT ORGANIC POLLUTANTS REGULATION (EU) 2019/1021	7
5.5 PACKAGING AND PACKAGING WASTE DIRECTIVE 94/62/EC	7
6 INTERNATIONAL SUBSTANCE REGULATIONS AND PROHIBITIONS	8
6.1 DIRECTIVE 2000/53/EC ON END-OF LIFE VEHICLES AND GADSL.....	8
6.2 CALIFORNIA PROPOSITION 65 SAFE - DRINKING WATER AND TOXIC ENFORCEMENT ACT, 1986.....	9
6.3 U.S. TOXIC SUBSTANCES CONTROL ACT (TSCA) 1976	9
6.4 U.S. DODD-FRANK-ACT - CONFLICT MINERALS	11
7 MODIFICATION HISTORY	12

List of Tables

Table 1-1: European and International Substance Regulations and Prohibitions.....	2
Table 5-1: RoHS Directive - Annex II - 10 Restricted hazardous substances	4
Table 5-2: RoHS Directive - Supplier Obligation	4
Table 5-3: REACH Regulation Article 56 and 67 - Annex XIV and Annex VII - Supplier Obligation	5
Table 5-4: REACH Regulation Article 33 - SVHC List – Supplier Communication Obligations	5
Table 5-5: REACH Regulation Article 31 - Safety Data Sheet - Supplier Obligations.....	6
Table 5-6: Waste Framework Directive – Supplier Obligation	6
Table 5-7: POP Regulation - Supplier Obligations.....	7
Table 5-8: Packaging and Packaging Waste Directive - Restricted substances	7
Table 5-9: Packaging and Packaging Waste Directive - Supplier Obligation	7
Table 6-1: IMDS Material Data Sheets - Supplier Obligations	8
Table 6-2: Neways Companies - IMDS IDs.....	9
Table 6-3: PROP 65 Enforcement Act - Supplier Obligation.....	9
Table 6-4: TSCA - Restricted PBT Substances	9
Table 6-5: TSCA - Restricted PBT Substances Supplier Obligation.....	10
Table 6-6: TSCA Section 8(a)(7) Supplier Obligations	10
Table 6-7: Conflict Minerals and Extended Mineral Substances.....	11
Table 6-8: U.S. Dodd-Frank-Act - Supplier Obligation	11

1 Purpose

Material Compliance is concerned with environmental and international laws and regulations that restrict or even prohibit the use of various substances in products. The purpose of this Material Compliance Supplier Guidance is to provide information from Neways Electronics International N.V. and all its operating companies (hereafter referred to as Neways) to define requirements for suppliers regarding material compliance and to ensure compliance with relevant legal environmental requirements within the supply chain.

Material Compliance is compliance with all environmental and material-specific requirements resulting from international laws, standards, and guidelines. Neways markets its products worldwide. Therefore, this Material Compliance Standard includes the following international laws in particular:

Table 1-1: European and International Substance Regulations and Prohibitions

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

The topic of material compliance has a direct product reference.¹ That means material compliance requirements are equivalent to other product requirements.

If changes in legislation are not reflected in this Supplier Material Compliance Guidance, or if legislation is not included, this does not relieve the supplier of the obligation to take these changes into account and to comply with the current legal requirements.

2 Supplier Requirements

Neways expects all suppliers to know the material composition of the products they supply and to evaluate them against the legal requirements. If any exemptions are used to fulfil the legal obligations, then these must be noted in the documentation (e.g., RoHS exemptions).

For continuous monitoring and evaluation of material compliance, Neways requires all suppliers to provide a detailed material declaration for each product supplied, listing all substances present with CAS number and concentration (percent). The declarations can be provided as a material report in the IMDS (International Material Data System) or in tabular form as a PDF or Excel file.

If a supplier is unable to provide a material declaration, they have the option of providing a product specific material compliance document that provides information on all relevant regulations and directives. This documentation must refer to the current status of the legislation and its substance bans, e.g., the current version of the SVHC list, including the number of substances listed and the date of the last update.

¹ Available at DIN EN 50581:2013-02; Technische Dokumentation zur Beurteilung von Elektro- und Elektronikgeräten hinsichtlich der Beschränkung gefährlicher Stoffe

3 Definitions (for clarity; other definitions are as per SFA)

Article	You may use substances to produce objects that have a special shape, surface, or design. When the special shape, surface or design determines the function to a greater degree than the chemical composition, these are called articles under the REACH legislation. ² Examples: clothing, furniture, electronics, practically all objects of modern life Articles can be assembled mechanically or joined using a substance/mixture to become a complex object (sub assembly).
Directives	Directives require EU countries to achieve a certain result but leave them free to choose how to do so. EU countries must adopt measures to incorporate them into national law (transpose) in order to achieve the objectives, set by the directive. National authorities must communicate these measures to the European Commission. Transposition into national law must take place by the deadline set when the directive is adopted (generally within 2 years). When a country does not transpose a directive, the Commission may initiate infringement proceedings . ³
Homogeneous material	Homogeneous material means one material of uniform composition throughout or a material, consisting of a combination of materials, which cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes ⁴ Examples: certain types of plastics, ceramics, glass, metals, alloys, paper, and board.
Mixture	A mixture is a mix or solution of two or more substances. Under the EU chemicals legislation, mixtures are not considered substances. Examples: soap, household cleaners, paint, glue, ink, metal alloys
Substance	A substance is a chemical element and its compounds in the natural state or the result of a manufacturing process. In a manufacturing process, a chemical reaction is usually needed to form a substance ⁵ . Examples: Metals, acetone, ethanol, dyes and pigments, diesel/other fuels
Regulations	Regulations are legal acts that apply automatically and uniformly to all EU countries as soon as they enter into force, without needing to be transposed into national law. They are binding in their entirety on all EU countries. ⁶

4 Scope of application

The Material Compliance Standard applies to all areas of Neways as well as to its contractors.

The regulatory substance requirements listed in the following sections apply to all substances, mixtures, and articles. The application context is specified in the detailed description under the relevant section of the law.

² REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (cf. Article 3(3) - Definitions)

³ Available at https://ec.europa.eu/info/law/law-making-process/types-eu-law_en, 21-09-2022

⁴ Available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02011L0065-20200301&from=EN>, Article 3 - Definitions, number 20, page 7

⁵ REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (cf. Article 3(3) - Definitions)

⁶ Available at https://ec.europa.eu/info/law/law-making-process/types-eu-law_en, 21-09-2022

5 European Substance regulations and prohibitions

5.1 RoHS Directive 2011/65/EU

The Directive 2011/65/EU on the Restriction of the Use of Certain Hazardous Substances (RoHS) in Electrical and Electronic Equipment (EEE) became European Law on 21 July 2011 and took effect in EU Member States from 2 January 2013. The RoHS Directive restricts the use of ten hazardous materials in EEE, including cables and spare parts for its repair.

The following substances are currently listed there, each of which may only be present in an electrical or electronic device up to a maximum of 0.1 percent by weight in the homogeneous material (exception: limit value cadmium = 0.01 percent by weight).

Table 5-1: RoHS Directive - Annex II - 10 Restricted hazardous substances


Groups	10 Restricted hazardous substances	Restricted limit (%) (each) by weight in homogeneous material	Restricted limit (ppm)
Heavy Metals	Lead (Pb)	0.1	1000
	Mercury (Hg)	0.1	1000
	Cadmium (Cd)	0.01	100
	Hexavalent Chromium (Cr VI)	0.1	1000
Brominated flame retardants	Polybrominated Biphenyls (PBB)	0.1	1000
	Polybrominated Diphenyl Ethers (PBDE)	0.1	1000
Phthalates	Bis(2-Ethylhexyl) phthalate (DEHP)	0.1	1000
	Benzyl butyl phthalate (BBP)	0.1	1000
	Dibutyl phthalate (DBP)	0.1	1000
	Diisobutyl phthalate (DIBP)	0.1	1000

The calculation of the above-mentioned proportions of substances always refers to the proportion of the substance in the homogeneous material!

- **Link:** [DIRECTIVE 2011/65/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#)
- **Link:** [Commission Delegated Directive \(EU\) 2015/863](#)

Table 5-2: RoHS Directive - Supplier Obligation

The suppliers are obliged to manufacture and deliver the products in compliance with the latest version of the Directive 2011/65/ EU (RoHS) if this has been contractually agreed. Upon request, the supplier shall provide written confirmation or suitable evidence (e.g., certificate of analysis).

	Supplier Material Compliance Guidance	NEI-GWI-E500
		Version: 2.0

5.2 REACh Regulation (EC) No. 1907/2006

Under REACh (Registration, Evaluation, Authorisation and Restriction of Chemicals), suppliers have several obligations. The main supplier obligations are outlined below:

A. Annex XIV (list of substances to authorisation) and Annex XVII (list of substances to restrictions)

Necessary measures resulting from Art. 56 and 67 of the REACh Regulation in conjunction with Annex XIV (substances subject to authorisation) and Annex XVII (substance restrictions) shall be complied with by the Supplier. The latest versions of Annex XIV and Annex XVII of the REACh Regulation are available on the following websites:

Link: [Annex XIV - List of substances to authorisation under REACh](#)

Link: [Annex XVII - List of Substances restricted under REACh](#)

When certain uses are restricted or the substance is banned on the EU market, substitution is necessary.

Table 5-3: REACh Regulation Article 56 and 67 - Annex XIV and Annex VII - Supplier Obligation

The supplier must inform Neways immediately if the product supplied by him contains substances that are subject to authorisation (Annex XIV) or restriction (Annex XVII).

The supplier should also obtain information and data from the upstream supply chain without further request.

B. Article 33: Obligation to communicate information on substances in articles.

The REACh regulation obliges all suppliers in the supply chain to inform about substances in articles that have been identified as SVHC (Substances of Very High Concern) and included in the so-called candidate list. Article 33(1) REACh stipulates that suppliers of articles must inform the purchasers of these articles about SVHC contained in the articles if they are present in a concentration of more than 0.1 percent by mass (based on the weight of the article). The principle "Once An article - Always An Article!" applies according to *EU Court of Justice decision - 10 Sept. 2015 in case C-106/14*.

All substances identified as SVHC are listed in the candidate list of the European Chemicals Agency (ECHA): <https://echa.europa.eu/de/candidate-list-table>, which is usually updated twice a year.

Table 5-4: REACh Regulation Article 33 - SVHC List – Supplier Communication Obligations

Neways expects all suppliers to inform immediately if a newly listed SVHC above 0.1% (mass percent) has been identified in an article or packaging delivered to Neways. The supplier must provide sufficient information about the SVHC present in his article, but at least

- a) the name of the substance,
- b) the CAS number,
- c) article in which the substance is contained and
- d) the Candidate List date which the information refers to

If no SVHC above 0.1% are contained in the delivered article, suppliers are expected to report this informally.

C. Safety Data Sheet

The Safety Data Sheet (SDS) is the essential information medium for substances and mixtures in the commercial supply chain. It is intended to provide professional users with recommendations for action to protect health and the environment. According to Article 31 of REACH, the supplier of a substance or mixture must provide the recipient of the substance or mixture with a safety data sheet in accordance with Annex II.

Table 5-5: REACH Regulation Article 31 - Safety Data Sheet - Supplier Obligations

<p>Neways expects all suppliers to provide a safety data sheet (SDS) free of charge when supplying substances or mixtures as defined by Art. 3(1) and (2) of the REACH Regulation and in accordance with Art. 31 and Annex II of the REACH Regulation.</p>
<p>Suppliers shall update the SDS (according to article 31(9)) without delay on the following occasions:</p> <ul style="list-style-type: none"> a) as soon as latest information which may affect the risk management measures, or latest information on hazards becomes available, b) once an authorisation has been granted or refused, c) once a restriction has been imposed.

5.3 Waste Framework Directive and SCIP database.

SCIP is the database for information on **S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts) established under the Waste Framework Directive (WFD).

Table 5-6: Waste Framework Directive – Supplier Obligation

<p>Neways expects all product manufacturers to provide the UUID (so-called SCIP dossier number) in addition to the REACH Regulation Article 33 (see Table 5-4: REACH Regulation Article 33 - SVHC List – Supplier Communication Obligation).</p>
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5.4 Persistent organic pollutants Regulation (EU) 2019/1021

The Persistent Organic Pollutants (POPs) Regulation (EU) 2019/1021 is a European Union regulation that aims to protect human health and the environment from the harmful effects of certain hazardous chemicals known as persistent organic pollutants. The Regulation establishes a framework for the control and management of POPs within the EU. It sets out specific rules for the production, placing on the market, use, and disposal of POPs. The Regulation is also aligned with the provisions of the Stockholm Convention on POPs, an international treaty that aims to eliminate or reduce the production and use of these substances worldwide. By implementing the POPs Regulation, the EU aims to reduce releases and exposure to POPs, promote the use of safer alternatives, and ensure the environmentally sound management of these hazardous substances.

The Regulation includes measures such as restrictions, elimination requirements, control measures, reporting obligations, and import/export restrictions to achieve these objectives.

The Regulation is amended by:

- a) Commission Delegated Regulation (EU) 2023/1608 of 30 May 2023 amending Annex I to Regulation (EU) 2019/1021 of the European Parliament and of the Council as regards the listing of perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds.
- b) Commission Delegated Regulation (EU) 2023/866 of 24 February 2023 amending Regulation (EU) 2019/1021 of the European Parliament and of the Council as regards perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds (Text with EEA relevance)

It prohibits or restricts (subject to Article 4) the production, placing on the market and use of the POPs listed in the following Annexes, whether on their own, in mixtures or in articles.

- Annex I: Prohibited POPs
- Annex II: Restricted POPs

Table 5-7: POP Regulation - Supplier Obligations

<p>The supplier must communicate relevant information to Neways about the presence of POPs. This includes providing accurate and up-to-date information on the composition of products or articles.</p>
<p>The supplier should also obtain information and data from its upstream supply chain without further request.</p>

5.5 Packaging and Packaging Waste Directive 94/62/EC

94/62/EC Directive on Packaging and Packaging waste – Article 11 limits the concentration of heavy metals in packaging as follows:

Table 5-8: Packaging and Packaging Waste Directive - Restricted substances

Restricted Substances	Maximum Sum of Concentration Level for all Restricted Substances
Lead, Cadmium, Mercury, and Hexavalent chromium (VI)	100 ppm by weight

Table 5-9: Packaging and Packaging Waste Directive - Supplier Obligation

<p>When supplying packaging within the meaning of Articles 2 and 3 of Directive 94/62/EC, the supplier must comply with the restriction of Article 11.</p>
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6 International Substance regulations and prohibitions

6.1 Directive 2000/53/EC on end-of life vehicles and GADSL

The End-of-Life Vehicles (ELV) Directive aims to limit the number of hazardous substances released into the environment and is specific to the automotive industry. In response to the ELV Directive, an International Material Database (IMDS) is in place to track and record substances listed on the Global Automotive Declarable Substance List (GADSL). The GADSL is a list of banned substances and declaration requirements.

A. Submission of IMDS material data sheets to Neways


To ensure a successful Production Part Approval Process (PPAP) with the customer, an accepted IMDS material report for the item is required. Therefore, we impose the following supplier obligations:

Table 6-1: IMDS Material Data Sheets - Supplier Obligations

Neways Electronics requires its suppliers to provide complete and correct MDS (Material Data Sheets) in the IMDS for all production materials supplied to Neways that are used in the automotive industry.
The MDS for Special Drawing Parts must be provided in good time before the part is sampled and sent to the specific IMDS ID of the Neways Operating Company performing the sampling (see Table 6-2: Neways Companies - IMDS ID)
For catalog parts supplied by distributors, the entry in the IMDS for Neways must be requested by the supplier from the manufacturer if a component manufacturer has decided to provide the required MDS exclusively to its contractors.

The MDS audit includes formal criteria (e.g., IMDS rules & recommendations) as well as criteria of legal and OEM specific material compliance (e.g., GADSL, ELV, REACH, OEM specific customer standards). The following requirements must be considered when creating a Material Data Sheet:

- Compliance with all IMDS Rules & Recommendations, specifically IMDS REC001
- Only one ID can be used for each Neways part number. For MDS updates, e.g., due to changes in material composition for an existing part number, a new version of the MDS must be created.
- MDSs Forwarding must be allowed for all MDSs sent to Neways.
- Exclusive use of the MDS prepared by the manufacturers of the materials or published by the IMDS Committee (Org. ID 313, 423 and 18986).
- Copying of materials already available in the IMDS is not allowed.
- Declaration of all materials/ingredients of all individual components in the MDS according to the applicable IMDS rules for wildcards and confidential substances.
- No representation of materials and components that do not remain on the component in the vehicle (e.g., protective foils, transport foils, production aids that are not included in the finished component).
- Check the completeness of the IMDS MDS according to the current drawing, substance list or comparable sources.
- Continuous monitoring of the declarable substances contained in the components and unrequested updating of the affected MDS, e.g., after changes to the GADSL (Global Automotive Declarable Substances List), changes to outdated application codes or because of system changes included in a new release.

	Supplier Material Compliance Guidance	NEI-GWI-E500
		Version: 2.0

- Provide chemical analysis reports of materials used if requested by Neways.

Table 6-2: Neways Companies - IMDS IDs

Neways Company	Company IMDS ID
Neways Electronics Riesa GmbH & Co. KG	807
Neways Neuenkirchen GmbH	1375
Neways Wuxi Electronics Co., Ltd.	208366

6.2 California Proposition 65 Safe - Drinking Water and Toxic Enforcement Act, 1986

The Safe Drinking Water and Toxic Enforcement Act of 1986, also known as California Proposition 65, contains a list of nearly one thousand hazardous substances/chemicals published by the State of California and updated annually by the Office of Environmental Health Hazard Assessment (OEHHA). Link to the list of chemicals of the OEHHA: <https://oehha.ca.gov/proposition-65>

The objectives of the Act are as follows:

- Protect California people and drinking water from chemicals known to cause cancer, birth defects or reproductive harm.
- Inform the population about exposure to such substances.

Table 6-3: PROP 65 Enforcement Act - Supplier Obligation

<p>To assist Neways in addressing customer inquiries related to PROP 65 and make compliance statements to our customers, we require the following feedback from our suppliers upon request:</p>
<p>a) The supplier will provide the name of at least one substance that will be subject to declaration in accordance with PROP 65. The order number and manufacturer of the articles must be provided.</p>

6.3 U.S. Toxic Substances Control Act (TSCA) 1976


A. TSCA - Restricted PBT Substances

On January 6, 2021, the U.S. Environmental Protection Agency (EPA) published final rules under Toxic Substances Control Act (TSCA) Section 6(h) to restrict import and use of five persistent, bio accumulative and toxic (PBT) chemicals. The final rules took effect on February 5, 2021.

These chemicals include:

Table 6-4: TSCA - Restricted PBT Substances

Substance name	CAS-No.
2, 4, 6 TTBP (2, 4, 6-Tris (tert-butyl) phenol)	732-26-3
DecaBDE (Decabromodiphenyl ether)	1163-19-5
HCBD (Hexachlorobutadiene)	87-68-3
PCTP Pentachlorothiophenol	133-49-3
PIP (3:1) (Triaryl Phosphates Isopropylated)	68937-41-7

	Supplier Material Compliance Guidance	NEI-GWI-E500
		Version: 2.0

Link: [Persistent, Bioaccumulative, and Toxic \(PBT\) Chemicals under TSCA Section 6\(h\)](#)

Table 6-5: TSCA - Restricted PBT Substances Supplier Obligation

<p>For Neways to comply with the regulatory requirements in the USA and to be able to make compliance statements, we require the following feedback from our suppliers upon request:</p>
<p>a) The supplier confirms in writing that their products meet the TSCA Section 6(h) requirements, prohibiting the use of five persistent, bioaccumulative and toxic (PBT) chemical substances. The article order number must be provided.</p>

B. TSCA Section 8(a)(7) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances

The U.S. Environmental Protection Agency (EPA) has introduced the TSCA Section 8(a)(7) PFAS reporting rule, which mandates companies to gather PFAS data from their supply chains. The EPA has identified at least 1,462 PFAS substances manufactured or used in the U.S. since 2011 that will be subject to this rule. **Initially, the rule was set to come into force on November 13, 2023, but the reporting period has been delayed.** The rule requires the submission of data on PFAS manufactured and imported since 2011, including PFAS incorporated into imported articles.

- **The reporting period is now set to begin on July 11, 2025**, and most manufacturers will need to complete their submissions **by January 11, 2026**
- **Small manufacturers** (as defined in 40 CFR 704.3) whose reporting obligations arise solely from article imports will have **until July 11, 2026**, to report PFAS to the EPA.
- The proposed rule also applies to importers of articles that contain PFAS (including articles containing PFAS as part of surface coatings)
- Distributors and contract manufacturers are also in scope if they import materials containing PFAS.

Link: [TSCA Section 8\(a\)\(7\) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances](#)

Table 6-6: TSCA Section 8(a)(7) Supplier Obligations

<p>To assist Neways in addressing customer inquiries resulting from the EPA's new TSCA reporting requirements regarding PFAS, we require the following from our suppliers:</p>
<p>a) Neways expects that suppliers of articles that may contain the PFAS specified by the EPA will take time to familiarize themselves with the rule.</p>
<p>b) Upon request, we require information regarding the presence and identification of the specified EPA PFAS substances.</p>

6.4 U.S. Dodd-Frank-Act - Conflict Minerals

Neways follows the EU and US directives and international regulations regarding Conflict Minerals. In the selection and management of our suppliers we expect our suppliers to manage towards a Conflict Minerals free supply chain in case of risks together with our customers and/or suppliers we will mitigate the risks towards a sustainable supply chain. Continuously we will exercise due diligence, as specified in the Organization for Economic Co-operation and Development (OECD), of the supply chain and inform our suppliers and customers accordingly.

The United States Securities and Exchange Commission (SEC) issued its final rules regarding Conflict Minerals as defined in and required by section 1502 of the Dodd-Frank Wall Street reform and Consumer Protection Act. These rules apply to many of Neways' customers which requires them to investigate the origin the Conflict Minerals in their supply chain.

It requires companies that must report to the SEC to determine if this minerals are necessary to the functionality or production of a product manufactured by that company and, if so, to report annually whether the 3T&G directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country.

The following tables shows the conflict minerals and extended minerals:

Table 6-7: Conflict Minerals and Extended Mineral Substances

Conflict Minerals (3TG) Substances	Extended Minerals:
Tin	Mica
Tantalum	Cobalt
Tungsten	
Gold	

The actual templates can be found on the Responsible Minerals Initiative (RMI) website:

CMRT: [Conflict Minerals Reporting Template \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org)

EMRT: [Extended Minerals Reporting Template \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org)

Table 6-8: U.S. Dodd-Frank-Act - Supplier Obligation

<p>For Neways to comply with regulatory requirements in the USA and to complete our CMRT and EMRT, we require the following feedback from our suppliers upon request:</p>
<p>a) Completion of the actual CMRT and EMRT after receiving an email “REQUEST regarding Conflict Minerals & Extended Minerals (Neways Electronics)”</p>
<p>b) If the supplier reports non-RMAP compliant smelters in the supplier CMRT, Neways expects the supplier to take corrective action in the supplier's supply chain to eliminate these noncompliant smelters. Neways also requires its suppliers to remove Russian smelters under US sanctions.</p>

7 Modification History

Date	Revision	Name	Description
03-04-2024	1.0	E. van Seeters-Sonntag	First edition created
11-11-2024	2.0	E. van Seeters-Sonntag	Update timeline for Reporting PFAS under TSCA Section 8(a)(7) page 10

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