

Environmental Standard

Version 3.2 (06.03.2024)

Reference: FQ-EU

Prohibition and declaration of substances

Table of contents

Ta	ble of contents	2
Tal	ble of acronyms	2
Pre	eface to the Environmental Standard	4
1.	Definitions	5
2.	Legal and other requirements	6
3.	Supplier obligations	9
3	3.1. Supplier declaration	9
4.	Prohibition and substances subject to declaration	10
4	4.1. Statutory substance restrictions – Relevant for all products	10
	4.1.1. Regulation (EC) No. 1907/2006	10
	4.1.2. German Chemicals Prohibition Ordinance	11
	4.1.3. Regulation (EC) No 2019/1021	11
4	4.2. Specific substance restrictions – Relevant for certain products	12
	4.2.1. Directive 2011/65/EU	12
	4.2.2. The Act for Resource Recycling of Electrical and Electronic Equipand Vehicles (Korea-RoHS)	
	4.2.3. China RoHS	14
	4.2.4. Directive 2006/66/EC	15
	4.2.5. Packaging Directive 94/62/EC	16
	4.2.6. Biocidal Products Regulation (EU) No. 528/2012	16
	4.2.7. Regulation on Deforestation-free products (EU) No. 2023/1115	16
	4.2.8. German Product Safety Act (ProdSG)	17
	4.2.9. Safe Drinking Water and Toxic Enforcement Act of 1986	17
	4.2.10. Toxic Substance Control Act 1976 (TSCA)	18
	4.2.11. Hazardous substances	19
	4.2.12. MOSH/MOAH	19



4.3 Additi	ional obligations to provide information for suppliers	20
4.3.1 Na	anomaterials	20
4.3.2 Cd	onflict minerals	21
5. Revision	n index	22
Table c	of contents	
Table 1: App	olicable regulations	6
	ostances regulated in accordance with Annex 1 German Chemicals Pro ChemVerbotsV)	
Table 3: Res	stricted substances in accordance with RoHS2	12
Table 4: Res	stricted substances according to Korea-RoHS	13
Table 5: Res	stricted substances according to China RoHS	14
Table 6: Reg	gulated substances in batteries and accumulators	15
Table 7: Reg	gulated substances in packaging	16
Table c	of acronyms	
AfPS	German Product Safety Commission	
Art.	Article	
BOMcheck	Centralised database for the declaration of substances	
CAS	Chemical Abstracts Service	

Cd Cadmium

DIN German Institute for Standardization

DKE German Commission for Electrical, Electronic & Information Technologies

ECHA European Chemicals Agency

EC **European Community**

EU European Union

 FSC^TM Forest Stewardship Council ™

wt% Percent by weight

Hg Mercury Kilogram kg Milligram mg

PAH Polycyclic aromatic hydrocarbons

Paragraph Para.

Pb Lead

Environmental Standard



PBB Polybrominated biphenyls

PBDE Polybrominated diphenyl ethers

POP Persistent organic pollutants

REACH Registration, Evaluation, Authorisation and Restriction of Chemicals

RoHS Restriction of Hazardous Substances

SDB Safety data sheet

SVHC Substances of very high concern

SCIP Substances of Concern In articles as such or in complex objects (Products)

TSCA Toxic Substance Control Act

VDE Association for Electrical, Electronic & Information Technologies

ZEK Central body for the exchange of experience



Preface to the Environmental Standard

Purpose This standard supports compliance with legal requirements and the re-

quirements of our customers.

Scope The standard applies to FESTOOL GmbH and all affiliated companies, here-

inafter referred to as FESTOOL. It must be taken into consideration for the

supply of all articles to FESTOOL.

This standard is an integral part of the supply contract and is therefore binding on all suppliers that supply articles to FESTOOL. It is deemed to have been accepted on acceptance of the order (supply contract, order

text, requirement forecast).

Contents The standard includes specifications for all substances that are prohibited

or subject to declaration for all articles used in FESTOOL products or placed on the market by FESTOOL. The standard is intended to provide suppliers

with assistance regarding the content of legal requirements.

Legal notice This guideline does not represent a full overview of the laws to be complied

with and does not release suppliers from being responsible for compliance

with applicable legislation.

Download The version currently applicable for suppliers can be found in the supplier

portal:

https://www.festool.com/suppliers/pages/suppliers.aspx



1. Definitions

Substance

A chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition (see REACH Art. 3 Para. 1).

Preparation

A mixture or solution composed of two or more substances (see REACH Art. 3 Para. 2).

Homogeneous material

A material with a uniform composition throughout or one that consists of a combination of materials that cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding or abrasive processes (see RoHS Art. 3 Para. 20).

SVHC

Substances of **v**ery **h**igh **c**oncern = these substances are listed in the Candidate List of the European Chemicals Agency (ECHA): http://echa.europa.eu/candidate-list-table

Article

This standard deems everything to be an article that is:

- Supplied to FESTOOL and remains in a product
- Supplied to FESTOOL as an auxiliary production material (this includes the supplier's working and auxiliary materials)
- Provided to FESTOOL as packaging to be passed on to external customers
- Supplied to FESTOOL and intended as a working material for internal purposes

Examples of articles include:

- · Finished products including commodity articles
- Assemblies
- Components
- Semi-finished goods
- Mixtures
- Substances
- Materials
- Packaging including conditioning materials such as desiccants or anti-corrosive agents



2. Legal and other requirements

The table below provides an overview of the regulations on which this standard is based.

Table 1: Applicable regulations

Info	Title	Explanation
REACH	Regulation (EC) No. 1907/2006	European chemicals regulation concerning the registration, evaluation, authorisation and restriction of chemicals (REACH).
RoHS	Directive 2011/65/EU	Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment.
EU Directive on Packaging and Packaging Waste	Directive 94/62/EC	Directive on packaging and packaging waste.
Biocidal Products Regulation	Regulation (EU) No. 528/2012	[] dated 22nd May 2012 concerning the making available on the market and use of biocidal products.
EU Battery Directive	Directive 2006/66/EC	Directive on batteries and accumulators and waste batteries and accumulators.
Amendment to the Battery Directive	Directive 2013/56/EU	Amendment to Directive 2006/66/EC [] regarding the placing on the market of portable batteries and accumulators containing cadmium intended for use in cordless power tools [].
Conflict minerals	Dodd-Frank Wall Street Reform and Consumer Protection Act	Section 1502: Disclosure relating to materials originating from conflict areas.
German Chemicals Prohibition Ordinance (ChemVerbotsV)	German Chemicals Prohibition Ordinance (ChemVerbotsV)	Ordinance on the prohibitions and restrictions for the circulation and emissions of certain substances, mixtures and products in accordance with the German Chemicals Act.



POP Regulation	Regulation (EC)	[] dated 20th June 2019 con-
1 Of Regulation	Nr. 2019/1021	cerning persistent organic pollutants (revision)
Regulation on Deforestation-free products	Regulation (EU) No. 2023/1115	[] dated 31th May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation.
German Product Safety Act (ProdSG)	German Product Safety Act (ProdSG)	German Product Safety Act concerning the implementation of the Machinery Directive 2006/42/EC and the Low Voltage Directive 2014/35/EU relevant here
California Proposition 65	Safe Drinking Water and Toxic Enforcement Act of 1986	Regulation in the US state of California. Regulates the obligation to provide information on chemicals contained in sold products and in the state's private and/or professional environment or which enter the environment.
China-RoHS	Administrative Measures for the Restriction of the Use of Hazard- ous Substances in Electrical and Electronic Prod- ucts	Regulation on the restriction of the use of certain hazardous substances in electrical and electronic equipment.
Korea-RoHS	Act for Resource Recycling of Electrical and Electronic Equip- ment and Vehi- cles	Regulation on the restriction of the use of certain hazardous sub- stances in electrical and elec- tronic equipment.
Toxic Substance Control Act 1976 (TSCA)	Toxic Substances Control Act (TSCA) Section 6 (h)	US-Chemikalienregulierung schränkt die Herstellung oder Einfuhr von Chemikalien ein
FSC®-certified forest raw materials	Chain of Custody Certification	The FSC chain of custody (CoC) is the path taken by products





FSC-STD-40-004 V3-0 EN	from the forest, or in the case of recycled materials from the moment when the material is reclaimed, to the point where the product is sold with an FSC claim
	and/or it is finished and FSC labelled.



3. Supplier obligations

All suppliers of articles to FESTOOL are obliged to:

- Be acquainted with the currently valid version of legal requirements and all applicable substance restrictions and to comply with them
- Recognise this standard (Generally as part of the supply contract)
- Fulfil their information obligations within the supply chain and involve upstream suppliers as appropriate
- Inform FESTOOL of any deviations from this standard
- Avoid the use of prohibited substances in a concentration above the threshold value in the supplied article (should the supplier fail to comply with the prohibition, FES-TOOL must be informed of the quantity of the prohibited material contained in the supplied article immediately so that further steps can be agreed with FESTOOL)
- Inform FESTOOL of substances subject to declaration contained in supplied articles indicating the material, substance name and percent by weight
- Take account of auxiliary and operating materials used by themselves or by upstream suppliers in manufacturing and transport as well
- Fulfil their information obligation in accordance with Article 33(1) REACH and inform FESTOOL, without being asked to do so, if the articles/products supplied to FES-TOOL contain a SVHC candidate beyond the threshold value

FESTOOL reserves the right to conduct laboratory analyses in individual cases in order to check compliance regarding substance prohibitions. Products which breach any statutory substance prohibitions will be immediately reclaimed and will result in suspended delivery.

3.1. Supplier declaration

In accordance with our legal obligation to comply with the EU Regulation REACH, the EU Directive RoHS2, and the EU Directive on packaging and packaging waste. Thus, we are obligated to ensure the conformity of delivered articles to FESTOOL.

A declaration is required from a supplier if one of the following reasons exists:

- An article is being provided as a sample or is being supplied for the very first time
- · Previous declarations were inadequate
- Substances and/or processes have been changed
- New/amended substance prohibitions and/or substance declaration obligations have come into force and the supplied article is affected
- FESTOOL makes a specific request for a declaration

The supplier must provide a declaration to the relevant purchasing department within 14 calendar days of the reason being announced. Compliance with the legal requirements is covered by an automated declaration process (material-compliance-process). Accordingly, the supplier can upload the documents via a link, which is sent by mail due to one of the above-mentioned reasons. The quality and punctuality of the declaration is included in the annual supplier evaluation. The communication takes place via material-compliance@festool.com.



4. Prohibition and substances subject to declaration

4.1. Statutory substance restrictions – Relevant for all products

4.1.1. Regulation (EC) No. 1907/2006

The REACH Regulation (EC) No. 1907/2006 is the European chemicals regulation concerning the registration, evaluation, authorisation and restriction of chemicals. The regulation applies to all articles covered by the definition of this standard (see Section 1).

Substance declarations in accordance with Articles 31 and 33 – SVHC Candidate List

All substances (SVHCs = **S**ubstances of **v**ery **h**igh **c**oncern) on the Candidate List are subject to declaration. SVHCs in mixtures and products are subject to the obligation of declaration if they exceed a maximum permitted concentration of 0.1% by weight. A declaration of articles containing substances on the Candidate List must be made to FESTOOL as soon as they become known. FESTOOL requires an indication of the article (FESTOOL product number), substance name, CAS number and percent by weight.

The current Candidate List can be accessed via the website of the European Chemicals Agency (https://echa.europa.eu/candidate-list-table).

The Candidate List is added to twice a year. Suppliers are obliged to keep themselves informed of updates to the list.

A selection of SVHCs that may be included in electrical and electronic equipment as well as their packaging can be accessed here:

https://www.bomcheck.net/en/suppliers/restricted-and-declarable-substances-list.

Substances subject to authorisation pursuant to Article 58 and Annex XIV

Annex XIV essentially prohibits the use of specific SVHC candidates. However, the special use of specific substances shall be permitted upon the submission and approval of an exception with the ECHA.

A list of substances subject to authorisation of Annex XIV is available at the following link:

https://echa.europa.eu/authorisation-list

Should articles supplied to FESTOOL contain any of the substances listed in Annex XIV, this must be reported immediately to FESTOOL.



Substance restrictions pursuant to Article 67 and Annex XVII

The REACH Regulation restricts the use of specific substances in principle or in certain applications. All restricted substances are listed in Annex XVII. This Annex can be found via the following link on the ECHA website:

https://echa.europa.eu/substances-restricted-under-reach

The articles supplied to FESTOOL must comply with the specifications in Annex XVII.

SCIP-Database

European suppliers who place articles on the market in the European Economic Area that contain one or more SVHC's above the established threshold (0.1% w/w) are required to report them to ECHA's SCIP database since January 05, 2021:

https://echa.europa.eu/de/scip

4.1.2. German Chemicals Prohibition Ordinance

In addition to Annex XVII REACH, the Chemicals Prohibition Ordinance (ChemVerbotsV) applicable in Germany restricts and/or prohibits the placing on the market of specific hazardous substances and mixtures and of specific products. The prohibited or restricted substances and mixtures in accordance with Annex 1 German Chemicals Prohibition Ordinance (ChemVerbotsV) are listed in Table 2.

Table 2: Substances regulated in accordance with Annex 1 German Chemicals Prohibition Ordinance (ChemVerbotsV)

Substances/mixtures
Formaldehyde
Dioxins and furans
Pentachlorophenol
Biopersistent fibres

The articles supplied to FESTOOL must comply with the specifications in the German Chemicals Prohibition Ordinance (ChemVerbotsV).

4.1.3. Regulation (EC) No 2019/1021

With the POP Regulation, the EU is implementing the results of Stockholm Convention on the prohibition and/or restriction of persistent organic pollutants. This binding international agreement prohibits and/or restricts the production, use and trade of 22 hazardous chemicals.

The following website provides an overview of the applicable regulation of the European Union on persistent organic pollutants:

https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32019R1021&from=DE

The articles supplied to FESTOOL must comply with the specifications in this regulation.



4.2. Specific substance restrictions – Relevant for certain products

4.2.1. Directive 2011/65/EU

Directive 2011/65/EU is known as RoHS2. RoHS stands for "Restriction of Hazardous Substances". The RoHS2 Directive, and the corresponding national derivations, shall apply to electrical and electronic equipment and restrict the usage of the substances listed in Table 3.

Table 3: Restricted substances in accordance with RoHS2

Restricted substances	Threshold value [% by weight]
Lead and its compounds	0.10
Cadmium and its compounds	0.01
Mercury and its compounds	0.10
Hexavalent chromium and compounds containing hexavalent chromium	0.10
Polybrominated biphenyls (PBBs)	0.10
Polybrominated diphenyl ethers (PBDEs)	0.10
Di(2-ethylhexyl)phthalate (DEHP)	0.10
Butyl benzyl phthalate (BBP)	0.10
Dibutyl phthalate (DBP)	0.10
Diisobutyl phthalate (DIBP)	0.10

The threshold values relate to the respective homogeneous material.

The articles supplied to FESTOOL must comply with the requirements of this directive. Certain applications are exempted from the substance restrictions (Annex III of the directive). However, the exceptions are only valid for a specific period of time and must be checked every five years to determine whether they still correspond to the state of the art. If an exception is used in accordance with RoHS2, Annex III, FESTOOL must be informed accordingly (specifying the exception with regards to the affected components/materials supplied). FESTOOL therefore aims to avoid using components/materials with RoHS exceptions.

FESTOOL expects its suppliers to take all measures to ensure compliance with RoHS. These include, for example, the preparation of technical documentation.



4.2.2. The Act for Resource Recycling of Electrical and Electronic Equipment and Vehicles (Korea-RoHS)

The Korean RoHS act restricts the same substances and establishes the same concentration limits as the Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) EU directive.

Table 4: Restricted substances according to Korea-RoHS

Restricted substances	Threshold value [% by weight]
Lead and its compounds	0.10
Cadmium and its compounds	0.01
Mercury and its compounds	0.10
Hexavalent chromium and compounds containing hexavalent chromium	0.10
Polybrominated biphenyls (PBBs)	0.10
Polybrominated diphenyl ethers (PBDEs)	0.10
Di(2-ethylhexyl)phthalate (DEHP)	0.10
Butyl benzyl phthalate (BBP)	0.10
Dibutyl phthalate (DBP)	0.10
Diisobutyl phthalate (DIBP)	0.10

The substance restrictions apply to the following electrical end devices from Festool GmbH's range:

Site radio and speaker



4.2.3. China RoHS

On 21st January 2016, the "Administration on the Control of Pollution Caused by Electronic Information Product" act (ACPEIP or "China RoHS I") was replaced by the "Administrative Measures for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products" act (China RoHS II).

The act came into force on 1st July 2016.

The scope of the act includes "electrical and electronic products" (EEP) that are imported to China or manufactured there. It considers machines and accessory products that are operated with electricity or electromagnetic fields and working voltages smaller than 1500 V (direct current) or 1000 V (alternating current), or act to transmit and measure currents and electromagnetic fields, excluding machines for energy generation, transmission and distribution.

The China RoHS substance regulations refer to the maximum concentrations in the homogeneous material of every product.

Table 5: Restricted substances according to China RoHS

Restricted substances	Threshold value [% by weight]
Lead and its compounds	0.10
Cadmium and its compounds	0.01
Mercury and its compounds	0.10
Hexavalent chromium and compounds containing hexavalent chromium	0.10
Polybrominated biphenyls (PBBs)	0.10
Polybrominated diphenyl ethers (PBDEs)	0.10

The products concerned must be identified according to SJ/T 11354-2014



4.2.4. Directive 2006/66/EC

All batteries and accumulators must comply with the requirements of Directive 2006/66/EC (EU Battery Directive). This directive prohibits the placing on the market of batteries and accumulators which exceed the threshold values for cadmium and mercury listed in Table 6.

Table 6: Regulated substances in batteries and accumulators

Regulated substances	Threshold value [% by weight]
Cadmium	0.002
Mercury	0.0005

All accumulators and batteries must be marked with the symbol of the crossed-out wheelie bin and, in addition, must either feature a black bar under the wheelie bin or the date of manufacture.

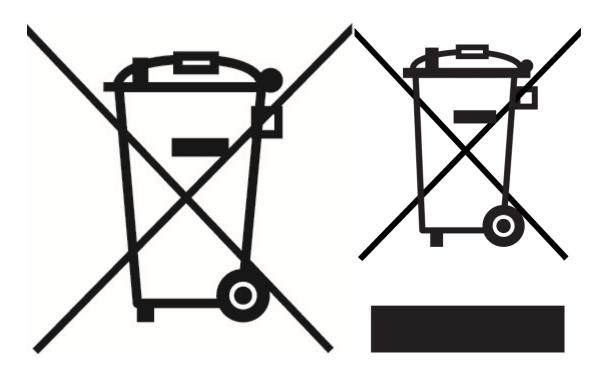


Figure: Wheelie bin without black bar and Electronic Equipment Act (Elektro G)

Figure: Wheelie bin with black bar Annex 3 German Electrical https://www.elektrogesetz.de/



4.2.5. Packaging Directive 94/62/EC

All packaging, regardless of the material, must comply with the requirements of EU Packaging Directive 94/62/EC. This directive restricts the concentration of heavy metals in the packaging, as shown in Table 7.

Table 7: Regulated substances in packaging

Restricted substance	Threshold value
Lead	
Cadmium	
Mercury	0.01% cumulative
Hexavalent chromium	

4.2.6. Biocidal Products Regulation (EU) No. 528/2012

The Biocidal Products Regulation (BPR, EU Regulation No. 528/2012) concerning the provision and use of biocidal products on the European market came into force on 1st September 2013. This regulation uniformly regulates the authorisation of biocides in the European Union, whereby this authorisation process has several steps.

All FESTOOL suppliers undertake to comply in full with the requirements and obligations for

- Biocidal products
- Treated goods.

The following website provides an overview of the applicable regulation of the European Union on the provision and use of biocidal products:

https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=CELEX:32012R0528&from=DE

All articles supplied to FESTOOL which have been treated with biocides must meet the requirements of the regulation and be reported to FESTOOL.

4.2.7. Regulation on Deforestation-free products (EU) No. 2023/1115

According to this EU regulation, any economic operator or trader who places products on the EU market or exports them from the EU market must prove that the products do not originate from recently deforested areas or have contributed to forest degradation. Products that contribute to deforestation include wood, cocoa, soy, palm oil, coffee, rubber and meat products.

All articles supplied to FESTOOL that consist of the above-mentioned products must comply with the requirements of the EU regulation on deforestation-free products.



4.2.8. German Product Safety Act (ProdSG)

The German Product Safety Act (ProdSG) is an instrument used to implement European directives, in this context in particular the Machinery Directive 2006/42/EC and the Low Voltage Directive 2014/35/EU, regarding the placing on the market and/or provision of products on the German market. Under this act, manufacturers, importers and traders undertake to only bring products to market which meet the statutory requirements regarding safety and the protection of health.

The following website provides an overview of the applicable directives of the European Union on the provision of products:

http://ec.europa.eu/growth/single-market/ce-marking/manufacturers/index en.htm

Manufacturers, importers and traders declare the product meets the requirements of all the applicable harmonised standards in the EU for this product, for example, by affixing the CE marking and drawing up the associated signed CE conformity declaration.

4.2.9. Safe Drinking Water and Toxic Enforcement Act of 1986

Proposition 65 (<u>Safe Drinking Water and Toxic Enforcement Act of 1986</u>) is a law which came into force in 1986 in the US state of California which was intended to promote the cleanliness of drinking water. It concerns all consumables which are bought or sold in California. The State of California lists over 900 chemicals that are classified as having a chance of causing cancer, triggering birth defects or causing reproductive toxicity.

If companies are not exempt from complying with requirements, they must deliver "a clear and unambiguous warning" if their products bring individuals into contact with the chemicals listed.

The supplier undertakes, upon request, to provide information about the listed substances and/or to provide the necessary warnings for the supplied articles. This means that FESTOOL can fulfil its obligation to affix warning notices to products intended for export to California.

The Office of Environmental Health Hazard Assessment California Environmental Protection Agency provides a questionnaire for users and interested parties:

<u>Clear-and-Reasonable-warnings-questions-and-answers-for-buisnesses.pdf</u>



4.2.10. Toxic Substance Control Act 1976 (TSCA)

The Toxic Substances Control Act 1976 (TSCA) is a US act that was passed in 1976 and is managed by the United States Environmental Protection Agency (EPA). The TSCA is an inventory of the chemicals that are currently used on the US market. The chemicals held in the inventory of the TSCA are designated as "existing chemicals", while chemicals that are not listed are designated as new chemicals. The TSCA forbids the manufacture or import of chemicals that are not in the inventory or not subject to any of the many exceptions.

In 2016, the Frank R. Lautenberg Chemical Safety for the 21st Century Act (TSCA reform) was passed as the first truly significant revision in many years.

The <u>United States Environmental Protection Agency (EPA)</u>, which is seen as the counterpart to the <u>European Chemicals Agency (ECHA)</u>, passed the <u>Toxic Substances Control Act (TSCA) Section 6(h)</u> in early 2021. In it, the EPA expresses restrictions on persistent, bioaccumulating and toxic substances (PBT). In addition to a ban on use, the presence of these substances, similar to <u>REACH</u>, must be communicated along the supply chain with immediate effect.

Further information on the precise restrictions and affected substances can be found on the following page of the EPA website.

Chemicals under the Toxic Substances Control Act (TSCA) | US EPA

Furthermore, the EPA stipulates, according to TSCA Title VI that came into force on 22nd May 2017, that formaldehyde emissions standards of composite wooden materials must be complied with. From 22nd March 2019, all composite wooden materials supplied to Festool had to be identified as "TSCA Title VI compliant". Including:

- Hardwood plywood
- MDF boards
- Chipboard

You can find more precise information on the following page of the EPA website.

https://www.epa.gov/formaldehyde



4.2.11. Hazardous substances

The safety data sheet is the key element in communication in the delivery chain for hazardous substances and mixtures. It provides important information about the following features:

- Product identity
- Occurring hazards
- Safe handling
- Measures for prevention
- Measures in an emergency

The requirements for the content and the format of the safety data sheet are set out in Article 31 and Annex II to the REACH Regulation (EC) No. 1907/2006.

The supplier of a substance or mixture is responsible for ensuring that the safety data sheet is filled out in full and such that it is technically accurate.

The safety data sheet shall be made available to FESTOOL, free of charge, on paper, electronically or as a download, no later than on the day of the first delivery.

Suppliers shall update the safety data sheet without delay (Art. 31(9)) if

- New information becomes available that could have an impact on risk management measures
- · An authorisation has been issued or denied
- A restriction has been imposed

The corrected version must be made available to FESTOOL immediately where this has been delivered within the last 12 months.

4.2.12. MOSH/MOAH

<u>Article 112 of French Law No. 2020-105</u> prohibits the use of mineral oil-based printing inks on packaging from January 1^{st} 2023 and the use of printing inks containing mineral oil for printed products from January 1^{st} 2025.

Furthermore, <u>Article 2 of the regulation of 13 April 2022</u> defines which substances are prohibited in this regard. These are:

- Mineral oil aromatic hydrocarbons (MOAH) with 1 to 7 aromatic rings
- Mineral oil saturated hydrocarbons (MOSH) with 16 to 35 carbon atoms

The law and the decree specify different maximum concentrations for use with two staggered cut-off dates. Accordingly, in France:

- **From January 1st 2023** until 31st December 2024, no packaging containing printing inks with a **MOAH concentration of > 1** % may be put into circulation. A transitional period of 12 months applies to goods produced before the deadline.
- From January 1st 2025, no more packaging and printed products will be put into circulation that contain printing inks with a MOSH & MOAH concentration of >



0.1 %. A transition period of 12 months also applies to goods produced before the deadline.

4.3 Additional obligations to provide information for suppliers

4.3.1 Nanomaterials

Nanoparticles are solid particles that are typically between 1 and 100 nanometres in size. One nanometre corresponds to one millionth of a millimetre. The environmental impact of nanoparticles has not yet been fully investigated.

Suppliers are obliged to inform FESTOOL of the use of nanomaterials.



4.3.2 Conflict minerals

The Dodd-Frank Act is a US law signed in July 2010 that obligates companies listed on the US stock exchange to declare the use of raw materials from conflict regions. Since this came into force, companies that use a conflict mineral must supply a separate report about the origin thereof by no later than 31st May. Conflict minerals in the meaning of this law include cassiterite, coltan, wolframite and gold, from which the following materials are manufactured: Tin, tantalum, tungsten and gold, including the 3TGs (tin, tantalum, tungsten, gold):

References to further information:

https://www.sec.gov/News/Article/Detail/Article/1365171562058

The Excel document issued by the

http://www.responsiblemineralsinitiative.org/

is preferred as the declaration medium.

Suppliers are obliged to inform FESTOOL of the use of, or indications of the possible use of, conflict minerals contained in articles supplied to FESTOOL. This shall apply regardless of the existing concentrations if the metals form part of the article for functional reasons.

4.3.3 FSCTM-certified raw forest materials

FESTOOL sees it as its corporate responsibility to use resources and energy efficiently across the world. The procurement of raw materials from responsible forest management, in accordance with high ecological and social standards, is a defined company goal at FESTOOL.

Our suppliers are consequently obligated to guarantee that all items supplied to FESTOOL that come from the forest, e.g. wood, paper, oils or cardboard, are supplied with an FSC certification. This information is communicated to FESTOOL via an invoice and delivery note for each delivery position. The supplier keeps current records of the incomings and outgoings of FSC-certified products to/from FESTOOL and archives these for at least five years.

The supplier is also obligated to communicate with FESTOOL without being asked to do so as soon as changes to the scope of the certificate have an impact on the FSC parts acquired by FESTOOL, the supplier denies having received an FSC-COC certificate, or if they no longer plan on being recertified. In the event of the latter, FESTOOL must be informed of this a year in advance.

Exceptions to requirement 4.3.3 must be decided after consultation with FESTOOL.



5. Revision index

Ver-	Date	Revision status	Prepared by
1.0	26.06.2014	First version	FQ-U/STGL
1.1	10.11.2014	REACH Annex XVII/XIV added	FQ-U/STGL
1.2	05.02.2016	Amendment to batteries	FQ-U/STGL
2.0	15.08.2017	Addition of: German Chemicals Prohibition Ordinance (ChemVerbotsV) EU POP Regulation (EC) No. 850/2004 Biocidal Products Regulation (EU) No. 528/2012 EU Timber Regulation (EU) No. 995/2010 Information on batteries and accumulators EU Conflict Minerals Regulation (EU) No. 2017/821 2011/65/EC List of hazardous substances Replacement of: PAH: Document ZEK 01.4-08 by document AfPS GS 2014:01 PAH Restructuring of Sections 4.1 and 4.2	FQ-U/STGL
2.1	17.09.2018	Layout and error corrections Updates: - Plasticisers to 2011/65/EC List of hazardous substances - Nanomaterials and conflict materials as an additional information obligation - Safe Drinking Water and Toxic Enforcement Act of 1986 - Biocidal Products Regulation (EU) No. 528/2012 - German Product Safety Act (ProdSG) - Incorporation of help in the form of online links	FQ-U/MRHS
3.0	06.05.2021	Updates: - EU-POP- Regulation (EC) No. 2019/1021 Addition of: - FESTOOL Material-Compliance-Process - SCIP-Database - China RoHS - Korea-RoHS - Toxic Substance Control Act 1976 (TSCA) - FSC requirements for suppliers	FQ-EU/ DTHK
3.1	25.09.2023	Addition: - MOSH/MOAH	FC-DE/ SCMR

