

Material Compliance Standard

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1 Introduction

This Material Compliance Standard describes the requirements of Steiner-Optik GmbH with regard to all known legally prohibited, regulated and declarable substances in their current form. This also applies accordingly to the respective national implementing acts of the directives and regulations as well as the sub-legal regulations applicable to the products (EN standards, DIN EN standards, VDE standards, ISO standards, etc.).

The delivered products (substances, materials, components, parts, assemblies and articles) must comply with the quality specified in the order, in particular this standard, and must be suitable for resale or for the manufacture of products for resale to consumers within the Steiner-Optik GmbH sales markets.

Irrespective of the specifications made in the order, the products delivered by the Supplier must comply in full and at the Supplier's expense with all product-related safety and environmental legislation applicable to the respective product and its packaging as amended from time to time at the time the products are delivered to Steiner, unless otherwise agreed.

If any changes to the law are not yet shown in this standard or laws are not included, this does not release the supplier from the obligation to take these changes to the law / laws into account and to comply with the current, applicable legal requirements.

The material compliance requirements are equivalent to all other product requirements.

Articles, products, materials and raw materials of unknown origin and/or composition or raw materials for which no sufficient material data is available may not be used.

The material data must be communicated in such a way that the declarable substances can be precisely assigned to the respective article or articles. At least the article name, the article number, the substance name and the identification number (CAS number) of the respective candidate substance must be provided. The supplier must use the material data communication platform DataCross to provide the information. If no declarable substances are included, this must be communicated in the same way.

The supplier of Steiner-Optik GmbH is obliged to provide the material information required to check compliance with the legal requirements and this standard free of charge. For this purpose, all material data shall be stored by the supplier in the DataCross platform. The use of the DataCross platform is free of charge for suppliers.

Furthermore, the technical data sheets and samples of all raw, packaging and auxiliary materials supplied must be submitted to Steiner-Optik GmbH free of charge for initial sampling on request. Steiner-Optik GmbH reserves the right to carry out tests and laboratory tests on materials.

In the event of changes or extensions to the legal basis, in particular the substance restrictions, the supplier shall actively examine the contractual goods to determine whether an update of the information in accordance with this standard is required. If this is the case, the Supplier shall provide Steiner with the updated information and declarations without delay.

The supplier is obliged to check at least every 6 months whether the Material Compliance Standard is available in an updated form. With the amendment of the Material Compliance Standard, it replaces the previous version and is valid with immediate effect. Steiner-Optik GmbH shall not notify the supplier of any changes to the Material Compliance Standard.

Steiner-Optik GmbH makes the Material Compliance Standard available on its website.

This Material Compliance Standard was prepared by tec4U - Solutions GmbH, Saar-Lor-Lux-Straße 13, D-66115 Saarbrücken. The use and/or reproduction of the standard is permitted to the company and the parties involved in the supply chain. For any use of the standard, in whole or in part, outside the supply chain, permission must be obtained from tec4U-Solutions GmbH.

2 Terms, abbreviations, sources

Substance:

means 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 Regulation (EC) No 1907/2006 Article 3(1)).

Examples of substances:

- organic: ethanol, aldehyde
- metallic: iron, copper, tin
- mineral: clay, loam

Mixture:

means a mixture or solution composed of two or more substances (see Regulation (EC) No. 1907/2006 Art. 3 para. 2)

Examples of mixtures:

- Mixtures: Seeds
- Mixture: Alloy
- Solution: Octane in gasoline

Homogeneous material:

means one material of uniform composition throughout or a material, consisting of a combination of materials, that cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes (see EU Directive 2011/65/EU Art. 3 Para. 20).

Examples of homogeneous materials:

- Plastic
- Ceramics
- Glass
- Alloy
- Coating

Added on purpose:

Generally known as the intentional use of a substance contained in an article to produce a particular property, appearance, function or quality.

Contamination:

The addition or presence of chemicals to or in another substance to such an extent that it becomes unsuitable for its intended purpose.

Battery:

means any device delivering electrical energy generated by direct conversion of chemical energy, having internal or external storage, and consisting of one or more non-rechargeable or rechargeable battery cells, modules or of packs of them, and includes a battery that has been subject to preparation for re-use, preparation for repurposing, repurposing or remanufacturing (see EU Regulation 2023/1542 Art. 3 para. 1)

Portable battery:

means a battery that is sealed, weighs 5 kg or less, is not designed specifically for industrial use and is neither an electric vehicle battery, an LMT battery, nor an SLI battery (see EU Regulation 2023/1542 Art. 3 para. 9)

Packaging:

shall mean all products made of any materials of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer. 'Non-returnable' items used for the same purposes shall also be considered to constitute packaging (see EU Directive 94/62/EC Art. 3 Para. 1)

Packaging components:

Parts of the packaging that can be separated by hand or by simple mechanical processes. Additional elements that are directly attached or fastened to a product and fulfill a packaging function are considered packaging, unless they are an integral part of the product.

Restricted substances:

Restricted substances may not be contained as substances, in mixtures and articles above the applicable limit values.

Declarable substances:

The substances classified as declarable are not desirable in some applications and must be declared above the specified limit values. The listed substances must be declared for each product, component, material, material preparation, auxiliary or operating material. The declaration obligation does not apply below these limit values.

Article:

means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition (see Regulation (EC) No. 1907/2006 Art. 3 para. 3).

Application deadline (Latest application date):

According to Regulation (EC) No. 1907/2006, an application for authorization must be submitted by this date (date is at least 18 months before the expiry date) so that the substance can continue to be used (deadline). Information on the application for authorization and the formal procedure for an application for authorization can be found at

<https://echa.europa.eu/de/applying-for-authorisation>

Sunset date:

After this date, the placing on the market and use of a substance listed in Annex XIV of Regulation (EC) No 1907/2006 is prohibited unless an authorization has been granted.

Endocrine disruptors:

Endocrine disruptors (EDs) are chemicals or mixtures of chemicals that interfere with the natural biochemical action of hormones and thus cause harmful effects (e.g. disruption of growth and development, negative influence on reproduction or increased susceptibility to specific diseases). (<https://www.umweltbundesamt.de/endokrine-disruptoren#1-bis-2>)

Persistence (chemistry):

In biology and environmental chemistry, persistence refers to the resistance of - usually organic - chemical compounds to chemical-physical and biological degradation.

CAS number:

The CAS number (also CAS registration number and CAS registry number, CAS = Chemical Abstracts Service) is an international designation standard for chemical substances. There is a unique CAS number for every chemical substance registered in the CAS database (including biosequences, alloys and polymers).

Sources of supply/assistance:

Platform for European regulations, directives and decisions, in all existing versions and official European languages - the year of publication and the publication number must be entered in the search mask

<http://eur-lex.europa.eu/>

Support area of the European Chemicals Agency (ECHA):

<https://echa.europa.eu/support/guidance>

REACH-CLP-Biocide Helpdesk - National information center of the federal government:

<http://www.reach-clp-biozid-helpdesk.de/de/Startseite.html>

REACH Helpdesk - German Environment Agency:

<http://www.reach-info.de>

Platform for German laws:

<https://www.gesetze-im-internet.de/>

3 Steiner-Optik GmbH List of legally restricted substances

3.1 Substance restrictions - relevant for all products

The legal substance requirements described in this section apply to all substances, mixtures and articles.

3.1.1 Regulation (EC) No. 1907/2006 REACH - Annex XIV - List of substances subject to authorization

The inclusion of a substance from the list of substances of very high concern in Annex XIV of the REACH Regulation leads to an authorization requirement for this substance at the end of the procedure. After a transitional period, the substance may only be used with an authorization or its use will be banned.

Explanations of the terms application deadline and expiry date can be found under point 2 Definitions and abbreviations.

Under the following link you can access the current Annex XIV of the REACH Regulation:

<https://echa.europa.eu/de/authorisation-list>

3.1.2 Regulation (EC) No 1907/2006 REACH - Annex XVII - List of restricted substances

Annex XVII of the REACH Regulation regulates or bans precisely defined substances in individual applications.

Under the following link you can access the current Annex XVII of the REACH Regulation:

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

3.1.3 Directive 2011/65/EU - RoHS

Directive 2011/65/EU of the European Parliament and of the Council regulates the restriction of the use of certain hazardous substances in electrical and electronic equipment. The substance restrictions of Directive 2011/65/EU refer to the maximum concentrations in the homogeneous material.

Table 1: Substance restrictions of Directive 2011/65/EU

Substance groups / substances	Maximum concentration in homogeneous material in percent
Cadmium and cadmium compounds	0,01%
Hexavalent chromium (Cr6+) and Cr6+ compounds	0,10%
Lead and lead compounds	
Mercury and mercury compounds	
Polybrominated diphenyl ethers (PBDE)	
Polybrominated biphenyls (PBB)	
Di(2-ethylhexyl) phthalate (DEHP)	
Butyl benzyl phthalate (BBP)	
Dibutyl phthalate (DBP)	
Diisobutyl phthalate (DIBP)	

3.1.4 Chemikalienverbotsverordnung - ChemVerbotsV

The Ordinance on Prohibitions and Restrictions on the Marketing of Hazardous Substances, Mixtures and Articles under the Chemicals Act is a German federal law that prescribes special national requirements in addition to Regulation (EC) No. 1907/2006. The national requirements for the following substances and substance groups are also specified :

Table 2: Substance restrictions according to the Chemikalienverbotsverordnung

Substances/mixtures
Formaldehyde
Dioxins and furans
Pentachlorophenol
Biopersistent fibers

The current requirements and the listed exceptions can be found in the legal text.

http://www.gesetze-im-internet.de/chemverbotsv_2017/index.html

3.1.5 Regulation (EU) 2019/1021 - Persistent organic pollutants (POPs)

This EU regulation implements the Stockholm Convention on Persistent Organic Pollutants. The Stockholm Convention is an agreement on internationally binding prohibition and restriction measures for certain persistent organic pollutants. The Convention thus prohibits or restricts the production, use and trade of hazardous substances, mixtures and articles.

Further information on the Stockholm Convention can be found on the official website at the following link:

<http://chm.pops.int/>

3.1.6 Produktsicherheitsgesetz (ProdSG)

The Produktsicherheitsgesetz (ProdSG) has been in force since July 16, 2021. It is the central legal regulation for the safety of products.

These may only be made available on the market if they do not endanger health and safety. According to Section 3, this is permitted if the legal interests listed in Section 8 (1) are not endangered when used as intended or in a foreseeable manner.

Making available on the Union market is equivalent to any supply of a product for distribution, consumption or use in the course of a commercial activity, whether in return for payment or free of charge.

https://www.gesetze-im-internet.de/prodsg_2021/

3.1.7 The Safe Drinking Water and Toxic Enforcement Act of 1986 - Proposition 65

California's Safe Drinking Water and Toxic Enforcement Act of 1986 is often referred to simply as California Proposition 65, or CP65 for short. The central content of the law is the requirement:

1. Prohibition of the contamination of drinking water with chemicals that are known to have carcinogenic or reprotoxic properties. There must be no contamination by this chemical in a body of water itself or in the soil where it can enter a drinking water source.
2. Warning about chemicals in products that are known to be carcinogenic or toxic to reproduction. No company may knowingly expose a person to these chemicals in the course of its business activities without first providing a clear and appropriate warning.

A list of the chemicals of the state of California in which the carcinogenic and/or reprotoxic substances are listed can be called up under the following link.

<https://oehha.ca.gov/proposition-65/proposition-65-list>

Further information can be found at:

<https://oehha.ca.gov/proposition-65>

3.2 Substance restrictions - valid for products from different scopes of application

In contrast to the substance restrictions in section 3.1, the supplier must check whether its products fall within the scope of the respective requirement for the regulations described in this chapter. If it is not possible for the supplier to clarify this independently, he must inform Steiner-Optik GmbH immediately.

3.2.1 Directive 94/62/EC - Packaging Directive

DIRECTIVE 94/62/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of December 20, 1994 on packaging and packaging waste restricts the concentration of heavy metals in packaging. Lead, cadmium, mercury and chromium VI compounds must not exceed a cumulative maximum concentration of 100 ppm by weight in packaging or packaging components.

3.2.2 EU Regulation (2023/1542) - Battery Regulation 2023

The Ordinance on Batteries and Waste Batteries, repealing Directive 2006/66/EC and amending Regulation (EU) 2019/1020 came into force on August 17, 2023. Annex I of the regulation restricts the use of mercury, cadmium and lead.

Table 3: Maximum concentration for batteries

Pure substances	Maximum concentration in the article in percent	Application restrictions
Mercury and mercury compounds	0,0005%	Batteries (in appliances and means of transportation)
Cadmium and cadmium compounds	0,002%	Device batteries (in devices and means of transportation)
Lead and lead compounds	0,01%	Portable batteries (from 18.08.2024)

3.3 Declarable substances

3.3.1 SVHC candidate list

The current version of the official SVHC candidate list according to Regulation (EC) 1907/2006 can be found at the following address:
<https://echa.europa.eu/de/candidate-list-table>

According to Article 33 of the REACH Regulation, every supplier is obliged to do the following:

1. Any supplier of an article containing a substance meeting the criteria laid down in Article 57 and identified in accordance with Article 59(1) in a concentration greater than 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information in his possession to allow safe use of the article, but shall indicate at least the name of the substance concerned.

Substances of very high concern (SVHC candidate list) in

- Components
- Spare parts
- Accessories
- Packaging

If the delivered products contain substances of very high concern in a proportion of more than 0.1% by weight, which are published in the so-called candidate list in accordance with Art. 59 Para. 1 of Regulation 1907/2006/EC, the contractor is obliged to provide all information in accordance with Art. 33 Para. 1 of Regulation 1907/2006/EC with the delivery without being requested to do so. This also applies if such a substance is only included in the candidate list during the ongoing supply relationship.

Private consumers must be provided with this information free of charge within 45 days upon request.

According to the decision of the European Court of Justice, the concept of "once an article, always an article" applies. As soon as a (partial) article exceeds the concentration limit of 0.1%, the presence of this SVHC candidate substance must be communicated.

If you supply articles with SVHC candidate substances greater than 0.1% by weight, we expect you to submit your SCIP dossier number in addition to your Article 33 notification.

3.4 Production consumables and supplies

3.4.1 Safety data sheets (SDS)

The safety data sheet is the central element of communication in the supply chain for hazardous substances and mixtures. It provides important information on the following features:

- Identity of the product
- Hazards that occur
- Safe handling
- Prevention measures
- Measures in the event of danger

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

The supplier of a substance/mixture is responsible for ensuring that the safety data sheet is filled out correctly and completely.

The safety data sheet shall be made available to Steiner-Optik GmbH free of charge on paper, in electronic form or as a download option on the day of the first delivery at the latest.

Suppliers shall update the safety data sheet immediately in accordance with Regulation (EC) No 1907/2006 (REACH) Article 31 (9) if

- new information is available that may have an impact on risk management measures
- an authorization has been granted or refused
- a restriction has been imposed

The corrected version must be made available to Steiner-Optik GmbH immediately if it has been supplied within the last 12 months.