

LEGRAND, NORTH & CENTRAL AMERICA CORPORATE ENVIRONMENTAL MATERIAL REQUIREMENTS POLICY

1.0 OBJECTIVE

To outline the Environmental Material Requirements (EMR) for suppliers to the US and Canadian Business Units of Legrand, North & Central America (LNCA), hereafter referred to as “LNA.”

2.0 POLICY AND SCOPE

LNA is integrating sustainability into the way we do business. We are committed to providing solutions that enable high performance, sustainable buildings, reducing the environmental impacts of our operations, and improving employee and community welfare. We hold ourselves to a high standard of documentation and substantiation in support of the environmental and social attributes of our products, consistent with the most up to date FTC Green Guides, and expect the same of our suppliers.

This document defines the restricted materials and disclosure requirements for suppliers of materials, component parts, and finished goods to LNA. The requirements include specific materials restrictions, declarations, and expectations for supplier communication. LNA’s EMR will continue to evolve with government and market requirements.

This document is effective immediately and applies to all companies that supply finished goods, component parts, or materials to an LNA Business Unit covered by this document.

Conformance with this document is required for all suppliers. All finished goods, component parts, and materials supplied shall be in full conformance by the implementation dates shown in Appendix B.

Suppliers shall provide a response to this request using Assent Compliance or another software approved for use by an LNA Purchasing Representative. Incomplete responses require a detailed explanation. Suppliers are considered non-conformant until a complete response is received.

For more information about sustainability at LNCA and our environmental material requirements, please visit <https://www.legrand.us/about-us/sustainability/supplier-resources>.

Please note that the links in this policy are for information only and are subject to change not controlled by LNCA.

3.0 DEFINITIONS

- 3.1 “US Business Unit” - An LNCA Business Unit that has its headquarters in the United States.
- 3.2 “Canadian Business Unit” - An LNCA Business Unit that has its headquarters in Canada.
- 3.3 “Finished Good” - Item in a completed state, fully packaged, marked and ready for shipment to our customers.
- 3.4 “Component Part” - Item provided to LNA for use as part of a finished good.
- 3.5 “Material” - A homogeneous solid, liquid or gas used to manufacture finished goods and component parts.
- 3.6 “EMR” - Environmental Material Requirements policy which outlines standards for finished goods, component parts, and materials supplied to LNA.
- 3.7 “PEP” - A Product Environmental Profile (PEP) is a verified document that discloses the environmental data of a product or product family based on a Life Cycle Assessment (LCA).
- 3.8 “RPPC” - Rigid Plastic Packaging Container (RPPC) laws have been enacted in several U.S. states, including California, Oregon, and Wisconsin.

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- 3.9 “RoHS” - The Restriction of Hazardous Substances Directive 2011/65/EU, with amendments dated 31 March 2015 (2015/863) and 15 November 2017 (2017/2102). This document will use the umbrella term “RoHS.”
- 3.10 “Prop 65” - Proposition 65, also known as “California’s Safe Drinking Water and Toxic Enforcement Act of 1986.”
- 3.11 “Conflict Minerals” - Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act requires publicly traded companies to disclose certain information regarding their use of “conflict minerals” if those minerals are “necessary to the functionality or production of a product” manufactured or contracted for manufacture by those companies. Conflict minerals are defined as cassiterite, columbite-tantalite, wolframite – and the derivatives tin, tantalum and tungsten – and gold (in this document, the term “3TG” refers to tin, tantalum, tungsten and gold).
- 3.12 “REACH” - Regulation (EC) No 1907/2006 of the European Parliament and the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).
- 3.13 “SVHC” - A substance of very high concern as determined by the REACH Regulation.
- 3.14 “Post-Consumer Recycled Content” - Material generated by households or by commercial, industrial, and/or institutional facilities in their role as end-users of the finished good that can no longer be used for its intended purpose. This includes returns of materials from the distribution chain.
- 3.15 “Post-Industrial Recycled Content” (also known as pre-consumer recycled content) - Material diverted from the waste stream during the manufacturing process. Excluded is the reutilization of materials such as rework, regrind, or scrap generated in a process and capable of being reclaimed within the same process that generated it.
- 3.16 “TSCA” - The Toxic Substances Control Act, which was amended under the Frank R. Lautenberg Chemical Safety for the 21st Century Act [15 U.S. Code Chapter 53] in 2016.
- 3.17 “Chemical Substance” - (EPA Definition) Under TSCA, any organic or inorganic substance of a particular molecular identity, including any combination of such substances occurring in whole or in part as a result of a chemical reaction or occurring in nature, and any chemical element or uncombined radical. Does not include mixtures, *but does include each separate component of mixtures* (Italics added for clarity. Not part of EPA definition.).
- 3.18 “Mixture” - (EPA Definition) Under TSCA, any combination of two or more chemical substances if the combination does not occur in nature and is not, in whole or in part, the result of a chemical reaction.
- 3.19 “SNUR” - A Significant New Use Rule under TSCA. Additional information is available at: <https://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/actions-under-tsca-section-5>.

4.0 REQUIREMENTS

- 4.1 **RoHS** – All finished goods, component parts, and materials supplied to LNA **shall conform with the materials restrictions of Article 4** of the RoHS Directive (2011/65/EU), as amended, **including amendment dated 31 March 2015 (2015/863)**.
 - (a) Note: The requirements in this section assume that the finished good, component part, or material will be used in a product that is sold in North America. Therefore, we are not requiring compliance with the entire EU RoHS regulation, but only the material restrictions of the regulation. However, it is possible that the finished good, component part, or material that you supply will be used in a product that will be sold in the EU. In that case, you shall be required to comply with the entire EU RoHS regulation, which includes marking and other technical requirements. The requirements for the EU RoHS regulation are shown in

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Appendix C. Your LNA Purchasing Representative will advise if these additional requirements apply to the finished good, component part or material that you supply.

- 4.2 **Prop 65** – All **finished goods** supplied to LNA that require a Prop 65 warning shall conform to the warning provisions of California Code of Regulations Title 27, Article 6, Section 25601 et. seq (“Safe Harbor Methods and Content”). All **component parts and materials** supplied to LNA shall be accompanied by disclosure of the presence of Prop 65 listed chemicals.
- 4.3 **Conflict Minerals** – All suppliers to LNA will be required to commit to being or becoming "conflict-free" by sourcing, where possible, tin, tantalum, tungsten, and gold (“3TG”) only from conflict-free smelters. All applicable suppliers to LNCA will also be required to only source 3TG from Responsible Minerals Initiative (RMI) listed smelters. Each affected supplier to LNCA will be required to provide a completed RMI - Conflict Minerals Reporting Template (CMRT) evidencing such supplier’s commitment to becoming conflict-free, documenting smelters of the 3TG that it purchases or that is contained in finished goods, component parts, and materials supplied to LNCA, and confirming those smelters are RMI listed. Any supplier that identifies smelters in their supply chain that are not RMI listed will have six (6) months to remove the smelter(s) from their supply chain. Extensions will be reviewed on a case-by-case basis should legitimate limitations exist for the supplier.
- 4.4 **Full Material Disclosure** – Suppliers shall provide substance disclosure information for all finished goods, component parts, and materials provided to LNA. The substance disclosure information shall include the substance names, CAS Numbers, and weight percent of any substance above the threshold of 1000 ppm (0.1%). A list of potential residuals and impurities shall be provided if available. This requirement applies in addition to, and not in place of, the other disclosure requirements discussed in this section (e.g., Conflict Minerals, Prop 65, etc.).
- 4.5 **Recycled Content** – Suppliers shall strive to use recycled content in component parts and materials where technologically feasible and shall inform LNA of the percentage of recycled content by weight, distinguishing between both post-consumer and post-industrial, for all finished goods, component parts, and materials provided to LNA.
- 4.6 **LNA Packaging Requirements and RPPC** – All **finished goods packaging** provided to LNA shall comply with the LNA Packaging Requirements of Section 5.7 and all applicable U.S. state Rigid Plastic Packaging Container (RPPC) laws (Including California, Oregon and Wisconsin – see Appendix B for more information). All other packaging provided to LNA is not required to comply, but compliance is encouraged.
- 4.7 **TSCA**
- (a) Section 5 - Any supplier of a chemical substance(s), and/or of a chemical substance(s) as a part of a mixture, shall notify LNA if that chemical substance is subject to a Significant New Use Rule (SNUR).
 - (b) Section 6 - Any supplier of a chemical substance(s), and/or of a chemical substance(s) as a part of a mixture, shall notify LNA if that chemical substance is subject to a TSCA risk management rule, including, but not limited to the TSCA Persistent, Bioaccumulative, and Toxic (PBT) Rules.
 - (c) Section 8 - Any supplier of a chemical substance(s), and/or of a chemical substance(s) as a part of a mixture, shall certify that all chemical substances supplied to LNA are listed as active on the most up to date version of the TSCA inventory.
- 4.8 **Effective Dates for Requirements** – See Appendix B.

5.0 PROCEDURES FOR COMPLIANCE WITH EMR REQUIREMENTS

- 5.1 **Suppliers reporting using Assent Compliance or another software approved for use by an LNA Purchasing Representative:**

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- (a) Shall complete all applicable sections of the questionnaires within Assent Compliance, or other LNA Purchasing approved software, and certify the accuracy of the data being provided. Note that the documentation shall be certified by a responsible representative of the supplier (i.e., a person who has both knowledge and authority to report on sustainability and environmental requirements).
- (b) Shall provide additional documentation as required by this document, if applicable.

5.2 RoHS

- (a) Suppliers shall certify that all finished goods, component parts, and materials provided to LNA **conform with the materials restrictions of Article 4** of the RoHS Directive (2011/65/EU), as amended, **including amendment dated 31 March 2015 (2015/863)**. Specific finished goods, component parts, and materials will require conformity, regardless of whether they had previously been purchased by LNA in a non-conformant form. Finished goods, component parts, and materials may contain no more than the maximum concentration value by weight in homogeneous materials of the substances restricted by RoHS as specified in Annex II with the following exception:
 - i) The application benefits from an active and valid exemption listed in either Annex III or Annex IV (if applicable) of RoHS, consolidated with the latest amendments. The latest list of exemptions can be found on the European Commission website.

Lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls, and polybrominated diphenyl ethers, bis (2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP), and diisobutyl phthalate (DIBP) are currently restricted by this EMR.

- (b) LNA is not generally requiring CE marking for supplied finished goods, component parts, and materials unless requested by your Purchasing Representative in line with Appendix C. However, such marking is permitted on RoHS-compliant finished goods, component parts, and materials that are in scope of EU RoHS, and in certain cases may be specifically requested by LNA. Contact your purchasing representative with any questions concerning the application of this provision to specific finished goods, component parts, or materials.

5.3 California Proposition 65

- (a) Finished Goods - Suppliers of finished goods that require a Prop 65 warning shall conform to the warning provisions of California Code of Regulations Title 27, Article 6, Section 25601 et. seq (“Safe Harbor Methods and Content”).
- (b) Component Parts and Materials - Suppliers of component parts and materials shall identify the Prop 65 listed chemical(s) and concentration(s) by % weight for any component parts and materials supplied to LNA.
- (c) Suppliers shall use Assent or another software approved for use by an LNA Purchasing Representative, to document the Prop 65 status of their finished goods, component parts, and materials.
- (d) Details on the label requirements for Proposition 65 can be found here: <https://www.p65warnings.ca.gov/>
- (e) The current list of chemicals is available at: http://oehha.ca.gov/prop65/prop65_list/Newlist.html

5.4 Conflict Minerals

- (a) Pursuant to LNCA’s Statement on Conflict Minerals, all suppliers to LNCA are required to comply with requests for Conflict Minerals information. Upon request, all suppliers shall provide a completed Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT) in the most current version available at the time of request that notes all smelters used within goods purchased by LNCA.
- (b) The CMRT includes information regarding the smelters and countries of origin for the 3TG contained in finished goods, component parts and materials supplied to LNCA. For the latest CMRT please refer to:

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<http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/>. For LNCA's Statement on Conflict Minerals, please refer to: <https://www.legrand.us/about-us/suppliers-and-partners/our-policy>.

- (c) Suppliers to LNCA will be required to only source tin, tantalum, tungsten, and gold ("3TG") from Responsible Minerals Initiative (RMI) listed smelters. Any supplier that identifies smelters in their supply chain that are not RMI listed will have six (6) months to remove the smelter(s) from their supply chain.
- (d) Suppliers shall make reasonable efforts to be or become "conflict-free" by sourcing tin, tantalum, tungsten, and gold (3TG) in finished goods, component parts and materials provided to LNA from smelters validated pursuant to an independent assessment program such as the Responsible Minerals Assurance Process (RMAP).

5.5 Full Material Disclosure

- (a) LNA is committed to providing transparency to our customers.
- (b) Suppliers shall provide substance disclosure information for all finished goods, component parts, and materials provided to LNA. Suppliers shall use Assent Compliance or another software approved for use by an LNA Purchasing Representative to disclose this information.
- (c) If substance disclosure information is not available in the supplier's internal documentation, the supplier is responsible for obtaining the information from the supply chain.
- (d) Suppliers shall update LNA of any compositional changes to the finished goods, component parts, or materials supplied to LNA.
- (e) These requirements apply in addition to the other disclosure requirements (e.g., Conflict Minerals, Prop 65 etc.) discussed in this document.

5.6 Recycled Content

- (a) Suppliers shall provide LNA with written documentation concerning the percentage of recycled content (including both post-consumer and post-industrial) present in all finished goods, component parts, and materials provided to LNA. Suppliers shall provide this information directly to their LNA Purchasing Representative.

5.7 Toxics in Packaging Requirements

- (a) The requirements of this section apply to all finished goods packaging provided to LNA and are optional for all other packaging.
- (b) Suppliers shall certify for all finished goods packaging (including all primary, secondary, and tertiary finished goods packaging) supplied to LNA that the sum of the incidental concentration levels of lead, mercury, cadmium, and hexavalent chromium present in any package or package component do not exceed 100 parts per million (0.01%) by weight. If packaging contains one or more of these substances, suppliers shall indicate which substances are included and if sold in the US, whether or not they apply any valid Toxics in Packaging Clearinghouse (TPCH) exemptions for their packaging.
- (c) Suppliers shall use Assent Compliance or another software approved for use by an LNA Purchasing Representative to disclose this information.

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5.8 RPPC Requirements

- (a) Suppliers that provide plastic containers intended for LNA finished good packaging shall declare if they are providing containers to LNA that are within the scope of an RPPC law (Including California, Oregon, and Wisconsin – see Appendix B for additional information).
- (b) Generally, RPPC requirements apply to a plastic container that:
 - (i) Is made entirely of plastic (except for incidental portions).
 - (ii) Has a relatively inflexible shape or form.
 - (iii) Has a minimum capacity or volume of eight (8) ounces up to maximum capacity or volume of five (5) gallons.
 - (iv) Is capable of at least one closure (including closure during the manufacturing process).

LNA Engineering and Purchasing will work with those suppliers providing containers (or finished goods in containers) which fall under the scope of an RPPC law to determine the options for compliance on a case-by-case basis. As an example, compliance options for the state of California are available at: <https://www.calrecycle.ca.gov/Plastics/RPPC/Enforcement/Compliance/>.

5.9 TSCA Requirements

- (a) Section 5. - Any supplier of a chemical substance(s), and/or of a chemical substance(s) as a part of a mixture, shall notify LNA if that chemical substance is subject to a Significant New Use Rule (SNUR).
- (b) Section 6. - Any supplier of a chemical substance(s), and/or of a chemical substance(s) as a part of a mixture, shall notify LNA if that chemical substance is subject to a TSCA risk management rule, including, but not limited to the TSCA Persistent, Bioaccumulative, and Toxic (PBT) Rules.
- (c) Section 8. - Any supplier of a chemical substance(s), and/or of a chemical substance(s) as a part of a mixture, shall certify that all chemical substances supplied to LNA are listed as active on the most up to date version of the TSCA inventory.
- (d) Suppliers shall disclose this information to their LNA Purchasing Representative.
- (e) The most up to date version of the TSCA inventory is available at: <https://www.epa.gov/tsca-inventory>.

6.0 ONGOING VALIDATION OF CONFORMITY

- (a) Suppliers shall submit or resubmit information regarding conformity with this EMR when requested by LNA Purchasing, when a new finished good, component part, or material is added to a supplier part list, or when a finished good, component part, material, or supply chain change occurs.

7.0 RECORDS

- (a) Suppliers shall maintain up to date records documenting conformance with the requirements of the EMR for all finished goods, component parts, and materials supplied to LNA. If a supplier elects to discontinue a particular finished good, component part, or material, the supplier shall notify LNA and continue to maintain such compliance records for that finished good, component part, or material for a period no less than 5 years from the date of discontinuance.
- (b) US and Canadian Business Units of LNCA shall maintain up to date records documenting conformance with the requirements of the EMR for all active finished goods, component parts, and materials. If a Business Unit elects to discontinue a particular finished good, component part, or material, the Business Unit shall continue to maintain such compliance records for that finished good, component part, or material for a period no less than 5 years from the date of discontinuance.

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8.0 REFERENCED DOCUMENTS

- 8.1 California Code of Regulations (CCR), Title 14 (14 CCR), Division 7, Chapter 4, Article 3. Rigid Plastic Packaging Container Program (RPPC)
- 8.2 Wisconsin Statutes Annotated, §100.297 Plastic Container Recycled Content
- 8.3 Oregon Recycling Act of 1991: Revised Statutes 459a.650- 665
- 8.4 Section 1502 of the Dodd – Frank Wall Street Reform and Consumer Protection Act
- 8.5 Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT)
- 8.6 The Restriction of Hazardous Substances Directive 2011/65/EU, with Amendments dated 31 March 2015 (2015/863) and 15 November 2017 (2017/2102)
- 8.7 Regulation (EC) No 1907/2006 of the European Parliament and the Council of 18 December 2006
- 8.8 Frank R. Lautenberg Chemical Safety for the 21st Century Act [15 U.S. Code Chapter 53 Subchapter 1]
- 8.9 California Code of Regulations Title 27, Article 6, Section 25601 et. seq (“Safe Harbor Methods and Content”) Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008
- 8.10 Toxics in Packaging Clearinghouse (TPCH) Exemptions

9.0 REFERENCES

- 9.1 Appendix “A” REACH SVHC SCIP Response Form
- 9.2 Appendix “B” Schedule of Implementation Dates for Requirements Outlined in EMR
- 9.3 Appendix “C” Product Line and Product Specific Requirements

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APPENDIX A: REACH SVHC SCIP Response Form – SCIP Data

Company Name: _____

Company Address: _____

Contact Person: _____

Email: _____

Telephone: _____

This letter is to confirm that the product(s) referenced below have been evaluated against Regulation (EC) 1907/2006 of the European Parliament, “**Registration, Evaluation, and Authorization of Chemicals (REACH)**”. These products have been found to contain REACH SVHCs, and therefore the REACH SCIP information is provided below.

Supplier shall notify LNCA of the product’s SCIP dossier code OR if the article does not have a SCIP dossier, supplier shall notify LNCA of the product’s TARIC code, SCIP article category code, and safe use instructions.

PRODUCT	Either	Or		
	SCIP Dossier Code	TARIC Code	SCIP Article Category Code	Safe Instructions Use

The most up to date SCIP TARIC code search tool can be found at: https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en

The most up to date SCIP article/mixture code “picklist” can be found at: <https://echa.europa.eu/en/scip-format>

Authorized Signature: _____

Name: _____

Title: _____

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APPENDIX B: Schedule of Implementation Dates for Requirements Outlined in EMR

LEGISLATION/REQUIREMENT	DESCRIPTION	IMPLEMENTATION DATE
DIRECTIVE 2011/65/EU	ROHS DIRECTIVE-- MATERIAL RESTRICTION REQUIREMENTS	AT PRESENT
DIRECTIVE 2015/863	ROHS AMENDMENT FOR PHTHALATES – MATERIAL RESTRICTION REQUIREMENTS ROHS AMENDMENT FOR PHTHALATES – EU ROHS COMPLIANCE REQUIREMENTS	AT PRESENT
SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986	CALIFORNIA PROPOSITION 65	AT PRESENT
CALIFORNIA CODE OF REGULATIONS (CCR), TITLE 14 (14CCR), DIVISION 7, CHAPTER 4, ARTICLE 3. RIGID PLASTIC PACKAGING CONTAINER PROGRAM WISCONSIN STATUTES ANNOTATED, §100.297 PLASTIC CONTAINER RECYCLED CONTENT OREGON RECYCLING ACT OF 1991: REVISED STATUTES 459A.650- 665	RIGID PLASTIC PACKAGING CONTAINER REQUIREMENT (RPPC)	AT PRESENT
SECTION 1502 OF THE DODD – FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT	CONFLICT MINERALS (CMRT)	AT PRESENT
LNA PACKAGING REQUIREMENTS	PACKAGING REQUIREMENTS FOR LNA PRODUCTS	AT PRESENT
FULL MATERIAL DISCLOSURE	FULL MATERIAL DISCLOSURE	AT PRESENT
RECYCLED CONTENT	RECYCLED CONTENT	AT PRESENT
TOXIC SUBSTANCES CONTROL ACT (TSCA)	TOXIC SUBSTANCES CONTROL ACT (TSCA)	AT PRESENT
REGULATION (EC) No 1907/2006	REACH	AT PRESENT

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APPENDIX C: Product Line and Product Specific Requirements

REACH Requirements

The requirements related to REACH apply only to suppliers of finished goods, component parts, and materials for LNA products that are sold onto the European market. You will receive a request from your LNA Purchasing Representative for this information if required.

Scope: This section refers only to the SVHC notification and restriction requirements within REACH.

1.0 DEFINITIONS

- 1.1 "REACH" Regulation (EC) No 1907/2006 of the European Parliament and the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).
- 1.2 "SVHC" A substance of very high concern as determined by the REACH Regulation.
- 1.3 "Article" See this guidance document for the meaning of "article" in this context:
<http://help.assentcompliance.com/hc/en-us/articles/360036180953-What-is-an-Article-under-REACH->
- 1.4 "SCIP" - Database for information on Substances of Concern In articles as such or in complex objects (Products) established under the Waste Framework Directive (WFD).

2.0 REQUIREMENTS

- 2.1 **REACH** – Suppliers of finished goods, component parts, and materials shall notify LNA if the finished good, component part, and/or material in question contains an article containing a substance on the candidate, authorization, or restricted substances lists above a concentration of 0.1 percent weight by weight (w/w). Supplier will additionally provide the name of the substance(s), concentration, and additional supporting information required to create a SCIP database entry for the article(s) and SVHC(s) in question.

3.0 PROCEDURES FOR COMPLIANCE WITH EMR REQUIREMENTS

3.1 REACH

- (a) Suppliers of finished goods, component parts, and materials shall notify LNA if the finished good, component part, or material in question contains an article containing a substance on the candidate, authorization, or restricted substances lists above a concentration of 0.1 percent weight by weight (w/w).
- (b) Suppliers shall use Assent Compliance or another software approved for use by an LNA Purchasing Representative to disclose this information.
- (c) If the finished good, component part, or material contains an SVHC, supplier shall notify LNA of its SCIP dossier code. Alternatively if the article does not have a SCIP dossier, supplier shall notify LNA of the article's TARIC code, SCIP article category code, safe use instructions, and any additional information required in order to create a SCIP database entry.
- (d) The most up to date REACH Candidate List (also known as the SVHC list) is available at: <https://echa.europa.eu/en/candidate-list-table>
- (e) The most up to date REACH Authorisation List is available at: <https://echa.europa.eu/authorisation-list>
- (f) The most up to date REACH Restricted List is available at: <https://echa.europa.eu/substances-restricted-under-reach>
- (g) The most up to date SCIP TARIC code search tool can be found at: https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en

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- (h) The most up to date SCIP article/mixture code “picklist” can be found at <https://echa.europa.eu/en/scip-format>
- (i) For additional information, please refer to ECHA’s Guidance on Requirements for Substances in Articles, which can be downloaded at: <https://echa.europa.eu/en/guidance-documents/guidance-on-reach>

EU RoHS Requirements

The requirements related to EU RoHS apply only to suppliers of finished goods, component parts, and materials for LNA products that are sold onto the European market. You will receive a request from your LNA Purchasing Representative for this information if required.

1.0 DEFINITIONS

- 1.1 “RoHS” the Restriction of Hazardous Substances Directive 2011/65/EU, with amendments dated 31 March 2015 (2015/863) and 15 November 2017 (2017/2102). This document will use the umbrella term “RoHS.”

2.0 REQUIREMENTS

- 2.1 RoHS – All finished goods, component parts, and materials supplied to LNA shall comply with the requirements of RoHS Directive 2011/65/EU, including amending Directive (2015/863). The addition of 4 phthalates is effective as of 7/22/2019. Also, as of that date, all categories of EEE (Electrical and Electronic Equipment) are in scope.

3.0 PROCEDURES FOR COMPLIANCE WITH EMR REQUIREMENTS

3.1 EU ROHS

- (a) Suppliers shall certify that all finished goods, component parts, and materials provided to LNA comply with the requirements of RoHS Directive 2011/65/EU, including amending Directive (2015/863). Specific finished goods, component parts, and materials will require conformity regardless of whether they had previously been purchased by LNA in a non-conformant form. Finished goods, component parts, and materials may contain no more than the maximum concentration value by weight in homogeneous materials of the substances restricted by RoHS as specified in Annex II (which currently include lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls, polybrominated diphenyl ethers, DEHP, BBP, DBP, and DIBP) with the following exceptions:
 - i) The application benefits from an active and valid exemption listed in either Annex III or Annex IV (if applicable) of the RoHS Directive (2011/65/EU), consolidated with the latest amendments.
 - ii) The finished good, component part or material is out of scope of the RoHS material restrictions requirements. Please refer to the EC RoHS 2 guidance document: http://ec.europa.eu/environment/waste/rohs_eee/events_rohs3_en.htm
 - iii) All categories of EEE are in scope as of 7/22/2019.
- (b) LNA requires CE marking for supplied finished goods that are required to comply with EU RoHS.
- (c) From 2nd January 2013, EEE in scope of RoHS that bears a CE marking is presumed to be in conformity with the requirements of RoHS and therefore is presumed not to contain more than the threshold maximum concentration values as mentioned in Annexes II, III and IV of RoHS consolidated and RoHS amending Directive. From 2nd January 2013, CE marking shall be the **only** marking which attests the conformity of the product with the requirements of RoHS. Pursuant to EC/765/2008, markings, signs or inscriptions that are likely to mislead third parties regarding the meaning or form of the CE marking shall be prohibited. Reference EU RoHS2 FAQ, Q8.11, Q8.12: <https://ec.europa.eu/environment/system/files/2021-01/FAQ%20key%20guidance%20document%20-%20RoHS.pdf>.

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- (d) Suppliers of finished goods that are required to comply with EU RoHS shall be responsible for maintaining a Technical File for these goods and shall supply a copy of the Technical File to LNA.

RoHS Requirements in Other Geographies

The requirements of RoHS-type regulations in geographies outside of the EU apply only to suppliers of finished goods, component parts, and materials for LNA products that are sold into the applicable market(s). You will receive a request from your LNA Purchasing Representative for this information if required.

Other RoHS-type regulations can be found in geographies including, but not limited to China, the Eurasian Customs Union, Bosnia and Herzegovina, Serbia, Moldova, North Macedonia, Kosovo, Thailand, Vietnam, Saudi Arabia, The United Kingdom (UK), and the United Arab Emirates (UAE).

LEGRAND, NORTH & CENTRAL AMERICA CORPORATE ENVIRONMENTAL MATERIAL REQUIREMENTS POLICY

DOCUMENT CHANGE NOTICE HISTORY LOG			
REV.	ECO NO.	DESCRIPTION OF CHANGE	DATE EFFECTIVE
A	n/a	Initial Release	2/3/16
B	n/a	Revised 4.4 to add 2 nd sentence to include specific documentation requirements for Chemical Reporting. Revised 5.6 (a) to add 2 nd sentence to include specific documentation requirements for Chemical Reporting.	3/1/16
C	n/a	Revised effective dates from 1/2018 to 12/31/2018	3/22/16
D	n/a	Changed “LNA” to “Legrand, North America” throughout EMR. Changed “LNA Prop 65 and Chemical Reporting Template” to “EMR and PEP Disclosure Form or Actio Software (Actio only to be used by those suppliers for which it is required)” throughout EMR. Revised 2.0 to specify “most up to date FTC Green Guides” in 1 st paragraph and “across each of its business units” in 2 nd paragraph. Added 3.2 to include a definition for a “PEP.” Revised 4.3 to make the 1 st sentence read “...by sourcing, where possible, tin, tantalum, tungsten, and gold (“3TG”) only from conflict-free smelters.” Revised 5.1 to add a reference to the “EMR and PEP Disclosure Form” and removed the reference to supplier data management software from 5.1 (a). Added 5.2 for suppliers reporting using Actio. Revised 5.5 (a) to add a link to Legrand, North America’s Statement on Conflict Minerals and make other minor edits. Moved Recycled Content to 5.7 and added “(including both post-consumer and post-industrial).” Revised 5.8 (a) to add a reference to Appendix C. and specified “finished goods” in 5.8 (c). Revised 6.0 (a) to add “when a new product, part or material is added to a supplier part list.” Revised 7.0 (a) to add a requirement for notifying Legrand, North America and added a reference to Actio in 7.0 (b). Revised Appendix A. to remove one of the reporting tables. Removed Appendix B. LNA Prop 65 and Chemical Reporting Template. Added Appendix D. Product Line Specific Requirements to add China RoHS requirements for one Business Unit.	10/11/16
E	n/a	Updated to incorporate edits made in Rev. B and C that were omitted in Revision D.	10/26/16
F	n/a	Revised 5.3 (a) to read “...polybrominated diphenyl ethers...”	07/07/17
G	n/a	Revised 5.1 (a) to read “Must state which products...” and “...documentation must be returned by a responsible representative of the supplier (i.e., a person who has both knowledge and authority to report on sustainability and environmental requirements) from a company owned e-mail address.” Revised 5.2 (b) to read “...all applicable sections of Questionnaires within Actio...”	07/26/17
H	n/a	Numerous editorial changes for clarity. Changed “Legrand, North America” to “LNA” throughout EMR. Revised 2.0 to include a note that the “...links in this policy are for information only and are subject to change...”	04/01/19

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		<p>Added "...another software approved for use by an LNA Purchasing Representative..." to all references to Actio throughout EMR. "EMR and PEP Disclosure Form" changed to "disclosure form linked to below" throughout EMR. Revised all requirements to apply to "finished goods, component parts, and/or materials." Added definitions for: "US Business Unit," "Canadian Business Unit," "Finished good," "Component part," "Material," "TSCA," "Chemical substance," "Mixture," and "SNUR." Revised 4.1 to add additional RoHS amendment (2015/863) and a note explaining that the material restriction requirements for RoHS are for products sold in North America; Added reference to Appendix D which outlines requirements for products sold into the European market. Revised 4.2 to include reference to Prop 65 labelling requirements. Revised 4.3 to update the conflict minerals reporting body and template names to "Responsible Minerals Initiative (RMI)" and "Conflict Minerals Reporting Template (CMRT)." Revised 4.4 to change the section title from "Chemical Reporting" to "Full Material Disclosure." Revised 4.4 to change the reporting requirement from 100ppm to 1000ppm. Added new requirement for the Toxic Substances Control Act (TSCA) to 4.7. Added 4.8, which refers to effective requirement dates in Appendix C. Revised 5.3 to add the additional RoHS amendment (2015/863) related to the phthalates. Added finished goods and component parts and materials sections to 5.4 to clarify requirements. Added updated link to the most recent list of Prop 65 chemicals to 5.4. Updated 5.5 to represent new name of the conflict minerals reporting template; Link updated for new reporting template. Revised 5.6 to change the chemical reporting name to "Full Material Disclosure." Revised 5.6 requirements from 100 ppm to 1000 ppm. Added requirement to 5.6 for suppliers to notify LNA of any compositional changes to finished goods, component parts, or materials supplied to LNA. Revised 5.9 for clarity on what constitutes rigid plastic packaging. Added 5.10 to outline the TSCA requirements. Added 7.0 (b) regarding the maintenance of records. Added 8.0 Referenced Documents section Changed Appendix A from Conformance Reporting Letter Template to REACH Response Form – SVHC Statement. Updated the packaging symbol chart in Appendix B. Updated dates in Appendix C; Updated references to California, Wisconsin, and Oregon packaging laws; Added REACH and China RoHS requirements to table; RoHS implementation date for EMR changed to 1/1/2020 for amendment 2015/863; Date for EU RoHS implementation added. Updated Appendix D for clarity on China RoHS requirements; Added REACH requirements for products sold into EU; Added RoHS requirements for products sold into EU.</p>	
I	n/a	<p>Revised 2.0 to add "... or the form referenced in Section 5.2 (if approved by an LNA Purchasing Representative)." Revised 3.5 to read "... homogeneous solid, liquid or gas used to manufacture..." Revised 5.3 (a) (i) to add "... consolidated with the latest amendments."</p>	05/16/19

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		Removed 5.3 (a) (iii) from the list of exceptions for the RoHS requirement Revised 6 (a) to read "... or when a finished good, component part, material, or supply chain change occurs."	
J	n/a	Numerous editorial changes for clarity. Updated all links as needed. Replaced "Actio" with "Assent Compliance" throughout. Revised "Conflict Minerals" sections to include a requirement that all applicable suppliers to LNCA will also be required to only source 3TG from RMI listed smelters. Added a reference to the PBT Rules within the TSCA section. Removed all references to the EMR disclosure form. Amended RoHS section to reflect the fact that DEHP, BBP, DIBP, and DBP are currently restricted by this EMR. Amended the "Packaging Requirements" section to "Toxics in Packaging Requirements," and added a reference to the TPCH. Also removed the referenced to packaging labeling from this section. Updated "Referenced Documents" section as needed to reflect changes elsewhere in this EMR. Removed the "Packaging Symbol Recognition" Appendix. Replaced the "REACH Response Form" with the "REACH SVHC SCIP Response Form." Updated the "Schedule of Implementation Dates for Requirements Outlined in EMR" table as needed to reflect changes elsewhere in this EMR. Replaced Appendix section titled "China RoHS Requirements" with an Appendix section titled "RoHS Requirements in Other Geographies." Added SCIP to the REACH section in the Appendix.	02/03/22