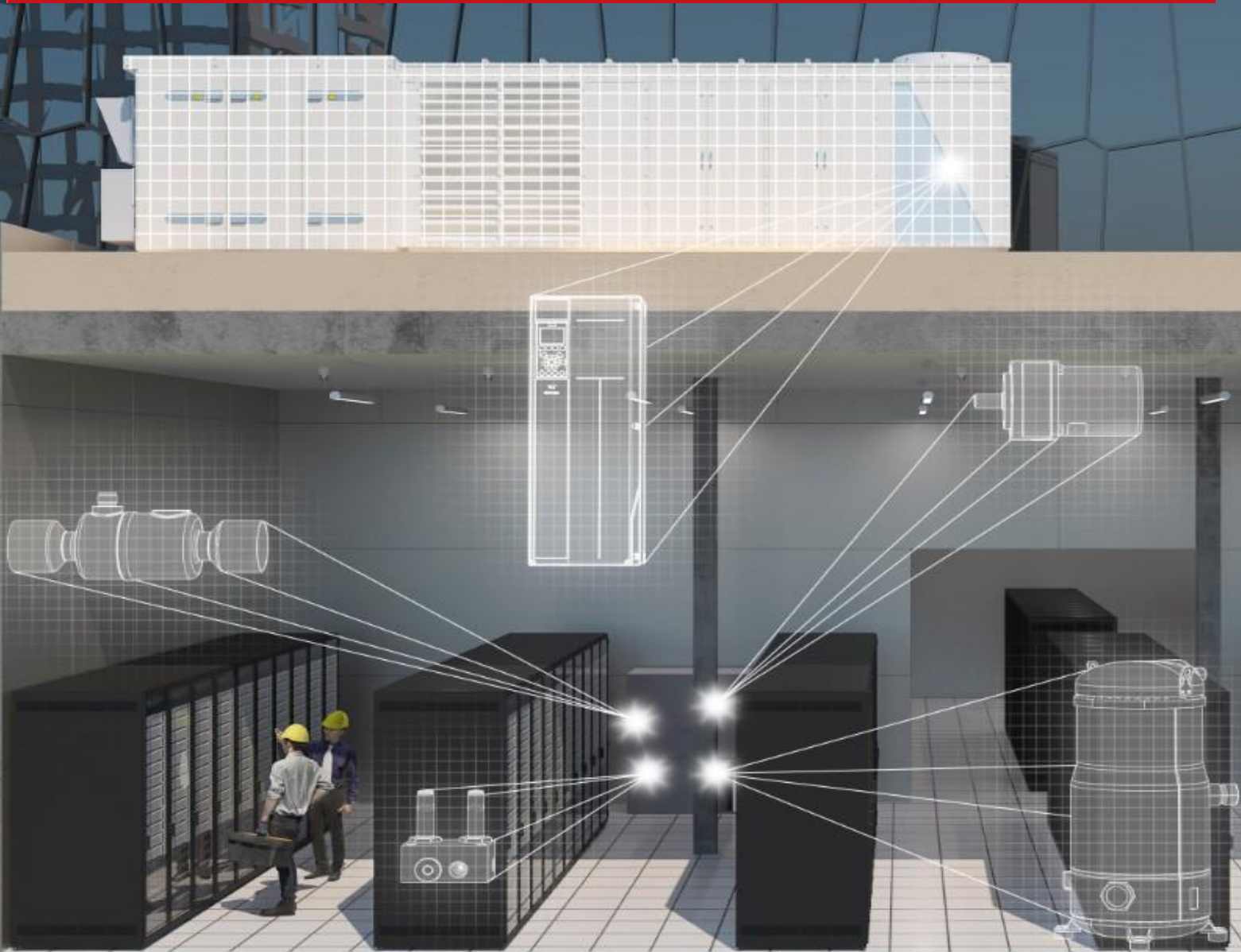


MATERIAL COMPLIANCE DATA REPORTING REQUIREMENTS

April 2025



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1. Scope

1.1 Danfoss Environmental Policy

Danfoss is committed to safe and sustainable products, proactively meeting compliance obligations of customers and regulators. This means that Danfoss proactively drives our compliance program with defined roles and responsibilities, continually monitors requirements from customers and regulators, addresses risks and achieves objectives through efficient processes work with our supply chain to minimize adverse impacts and continually improve compliance processes across our businesses.

1.2 Purpose

This document aims to outline the specifications for suppliers required by Danfoss to ensure compliance of products and activities to environmental regulatory requirements. The information described in this document is aimed at helping our suppliers answer our requirements.

In any case, suppliers must refer to official laws, directives, regulations, and other standards applicable to their products and activities.

2. Danfoss Product Compliance Requirements

Danfoss is strictly following compliance obligations and is required to comply with an increasing number of customers and substance regulatory requirements around the world to sell our products.

In general, Danfoss is requesting suppliers to supply full material declarations ("FMDs") as described in clause 2.1.

In specific cases of inability to provide FMD, a set of declarations of conformity covering concerned regulations, listed in clause 2.3 may be acceptable to Danfoss for limited periods of time.

Note: Danfoss is encouraging its suppliers to provide FMD as the primary document for compliance request to fulfill global regulatory requirements.

2.1 Full Material Declarations

A FMD is a detailed breakdown of a product, component, or material in homogeneous/substance/material level. This declaration is quantitative based as it provides the % weight of each individual material in the part and the % weight of each substance which is intentionally added to each material.

Utilizing FMDs rather than certificates of compliance not only streamlines compliance management but also ensures adaptability to future regulatory changes, effectively future proofing the compliance program.

FMDs can be created by the suppliers for their own products by collecting the part level full material composition information starting from their downstream supply chain.

2.1.1 Material Data Reporting Requirements and Training

To effectively follow up on both regulatory and customer requirements regarding product environmental compliance, Danfoss are expecting all relevant suppliers to join us in the reporting of FMDs.

Danfoss have designated tools to assist us and our suppliers in the process of data reporting. To meet Danfoss' reporting requirements, our suppliers are expected to submit data through CDX or IMDS online Portals. Registration and submission of data is free of charge.

https://www.danfoss.com/en/about-danfoss/company/sustainability/product-compliance/#material_data_reporting

(OR)

FMD preferably in [IPC1752A Class-D](#), [IEC62474](#) format.

Points to be highlighted:

- ✓ Danfoss is preferring FMD as primary document to fulfil the chemical compliance requirements.
- ✓ If you (Supplier/Manufacturer) submit an FMD with confidential/hidden substances, you must submit the RoHS and Reach, PFAS Statement along with the FMD.

If the Supplier is unable to provide the Full Material Declaration (FMD), they must provide the necessary documentation to support compliance and ensure transparency in material disclosure as per Clause 2.3(concerned regulations).

2.2 Danfoss Negative List

The Danfoss Negative List is the cornerstone of Danfoss' efforts to reduce the use of harmful substances in our production and products. It is applicable worldwide and can only be replaced by stricter local legislation.

The Danfoss Negative List is based on applicable legislation, but for selected substances, Danfoss has adopted restrictions that go beyond current legislation.

Suppliers, tenants, and contractors working on Danfoss' premises must comply with the Danfoss Negative List.

https://www.danfoss.com/en/about-danfoss/company/sustainability/product-compliance/#negative_list

2.3 Concerned Regulations

SI No	Subject	Concerned regulation	Document to be filled by the supplier	Reportable Danfoss Segments
1	RoHS	EU Directive 2011/65, as amended	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
2	REACH	EU REACH Regulation 1907/2006, as amended	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
3	WEEE Directive	WEEE Directive 2012/19/EU	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
4	California Prop65	Safe Drinking Water and Toxic Enforcement Act of 1986	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
5	US TSCA	Toxic Substances Control Act (TSCA) and Federal Facilities	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
6	PFAS	Per- and polyfluoroalkyl substances	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
7	Packaging Directive	Packaging Directive 94/62/EC	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
8	POP	Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (recast)	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
9	ODSR	EU: Ozone Depleting Substances Regulation (EC)	Environmental Supplier declaration form	Drives, Climate Solutions,

		No 1005/2009 Recast ODS Regulation		Power Solutions
10	GADSL	GADSL List	Environmental Supplier declaration form	Climate Solutions, Power Solutions
11	BPR	EU: Biocidal Products Regulation (EU) No 528/2012 Recast of Biocides Directive 98/8/EC	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
12	CEPA	Canada: Environmental Protection Act, c. 33, 1999 [CEPA Regulation]	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
13	Ship Recycling	EU: Recycling of Ships, Regulation (EU) No 1257/2013 Hong Kong International Convention (IMO/IHM)	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions
14	WFD	Waste Framework Directive	Environmental Supplier declaration form	Drives, Climate Solutions, Power Solutions

In addition to the above, other requirements such as, but not limited to segment specific, division specific, region-specific requirements may apply.

2.3.1 Documentation from Suppliers

Danfoss suppliers shall comply with applicable legislation for markets where the Danfoss products will be marketed. When a new or existing part, component or product supplied to Danfoss is released or redesigned, the newest, relevant legislation shall be considered.

Danfoss requires suppliers to provide declarations confirming that all materials, parts, components, assemblies, and products meet Danfoss's environmental compliance requirements. The supplier shall provide Danfoss with evidence of compliance, any available document about the environmental performance of the product and manufacturing process.

In addition, Danfoss also requires suppliers to disclose information about the content of certain substances in their products. The respective compliance evidence must be sent to Danfoss on request, preferably as an FMD.

In case of use of a RoHS exemption, this must be clearly stated. Additionally, an authorized person must sign the [Danfoss Substance Declaration Form](#).

Mandatory documentation: (If full FMD is not supplied by Supplier)

- Please submit the [Danfoss Substance Declaration Form](#)

If your components/parts are not compliant with any of the regulations mentioned in clause 2.3, then please share the signed certificate of compliance and justification for the non-compliance.

Additional documentations which may be requested for the regulations mentioned in clause 2.3:

- **Test Reports from Accredited Laboratories (XRF, ICP-OES analysis for hazardous substances).**
- **Safety Data Sheets (SDS) for chemicals used in coatings, lubricants, and plastics.**
- **Plans for the substitution and gradual phase-out of hazardous substances.**

Please note that Danfoss cannot purchase your products without the requested documentation. The proof of compliance and respective documentation must be transmitted to Danfoss within 14 calendar days upon request.

Note:

Specifically for subassemblies, complex accessories, and third-party equipment, suppliers must submit the following documentation:

- **Indirect materials details used at the Manufacturing Process.**
- **FMD or [Danfoss Substance Declaration Form](#) for the indirect material.**