

ENVIRONMENTAL LEGISLATION OVERVIEW

Harwin monitors and complies with relevant environmental legislation. For product-specific information, please refer to the Material Composition (FMD) documents and supporting declarations.

The tables below provide an overview of relevant environmental legislation and related customer requirements, grouped by applicability and the level of declaration or support Harwin can provide. Definitions of the status terms are included below, and product-specific information is available via the relevant FMD and supporting declarations.

Definitions

- **Compliant:** Harwin has assessed the legislation as applicable and confirms compliance for relevant products, supported by supplier declarations and/or internal due diligence.
- **Supplier requirement:** Harwin requires suppliers to meet this legislation where applicable and may request supporting evidence.
- **Customer-supported / On request:** Harwin can provide information to support customer obligations (e.g., supply chain reporting or downstream declarations) upon request.
- **Information on request:** Information is not routinely declared in this document and is provided via FMD or separate documentation when requested.
- **Monitored:** Harwin tracks this requirement and assesses applicability. Information is provided where relevant.
- **Not applicable (components):** Harwin products are components rather than finished equipment, so full compliance obligations typically sit with the manufacturer placing finished equipment on the market.
- **Responsible sourcing / due diligence:** Harwin supports responsible sourcing by applying supply chain due diligence, requesting supplier declarations, and maintaining processes to support applicable customer and regulatory reporting requirements.

Compliance declarations

Legislation / Standard	Region	Status	Evidence / Where to find info	Notes
Conflict Minerals (3TG) / Responsible Minerals	Global	Responsible sourcing / due diligence	Harwin Conflict Minerals statement / CMRT / EMRT	Suppliers are required to support responsible sourcing.
Packaging and Packaging Waste Directive 94/62/EC + amendments	EU	Supplier requirement	Supplier declarations (internal); on request	Harwin places a requirement on suppliers to ensure compliance.
REACH Regulation (EC) No 1907/2006	EU	Compliant	Harwin REACH Statement; FMD (product-specific)	SVHC declarations are reviewed and updated when the Candidate List changes.
Regulation (EU) 2019/1021 (Persistent Organic Pollutants) + amendments	EU	Compliant	Harwin POPs Declaration of Compliance; FMD (product-specific)	Harwin confirms compliance with Regulation (EU) 2019/1021 (Persistent Organic Pollutants) + amendments based on reasonable enquiry and supplier declarations.
RoHS Directive 2011/65/EU + amendments	EU	Compliant	Harwin RoHS statement (product-specific); FMD (product-specific)	
TSCA (Toxic Substances Control Act)	US	Compliant	Harwin TSCA PBT Statement / FMD (product-specific)	
UK REACH	UK	Compliant	Harwin REACH Statement; FMD (product-specific)	
UK RoHS Regulations (2012, as amended)	UK	Compliant	Harwin RoHS statement (product-specific); FMD (product-specific)	

Product / customer-supported info

Legislation / Standard	Region	Status	Evidence / Where to find info	Notes
AD-DSL	Automotive / Global	Information on request	FMD (product-specific)	Please cross-check with the target product's FMD.
GADSL	Automotive / Global	Information on request	FMD (product-specific)	Please cross-check with the target product's FMD.
Halogen Free requirements	Various	Information on request	FMD (product-specific)	Harwin supports customer requirements for halogen-free / low-halogen materials where specified. Definitions are typically per IEC 61249-2-21 (halogen-free materials) and/or JEDEC/ECA JS709 (low-halogen for electronic products). Product-specific information is available via FMD/on request. Harwin is using Halogen-free plastics in all new designs and considering our options for existing products.
MOFCOM & GAC China Order 18 (Rare Earths)	China	Information on request	FMD (product-specific)	Based on reasonable enquiry and supplier declarations, Harwin is not aware of the 7 defined rare earth materials being present.
PFAS (regulated restrictions)	Global / EU	Information on request	FMD (product-specific)	Based on reasonable enquiry and supplier material declarations, Harwin is not aware of any PFAS that are currently restricted under applicable legislation being intentionally present in Harwin products, except where specifically identified. Some coax contact and cable products contain PTFE (CAS No: 9002-84-0). Please refer to the Harwin PFAS statement for the list of affected products and to the relevant Material Composition (FMD) document for product-specific confirmation.
Proposition 65	California (US)	Information on request	Harwin California Proposition 65 Statement / FMD (product-specific)	Harwin can provide information on request to support customer restrictions or screening requirements where applicable.
SCIP Database (SVHC in articles)	EU	Customer-supported / On request	FMD / SCIP category data	SCIP submissions are typically made by the EU-based duty holder. Harwin can supply SCIP data upon request.
UL 94 flammability ratings	Various	Customer-supported / On request	Information on request / UL Yellow Cards	

Typically not applicable to components

Legislation / Standard	Region	Status	Evidence / Where to find info	Notes
ELV Directive 2000/53/EC	EU	Not applicable (components) / Monitored	FMD (product-specific)	Harwin products are components (not finished vehicles). Any Harwin product compliant with The EU RoHS Directive will also comply with The EU's ELV Directive (2000/53/EC).
WEEE Directive 2012/19/EU	EU / UK	Not applicable (components) / Monitored	Information on request	Harwin products are components (not finished EEE). Dispose at end of its working life per UK WEEE requirements where applicable.

Monitored / applicability dependent

Legislation / Standard	Region	Status	Evidence / Where to find info	Notes
Asbestos	Various	Monitored	FMD (product-specific)	Based on reasonable enquiry and supplier material declarations, Harwin is not aware of any asbestos being present in Harwin products.
Battery legislation	EU / UK	Not applicable / Monitored	FMD (product-specific)	Harwin does not supply batteries with, or in, its products.
Biocidal Products Regulation (BPR) / biocidal treated articles	EU / UK	Not Applicable / Monitored	FMD (product-specific)	Harwin products are not treated articles.
China RoHS	China	Monitored	Information on request; FMD (product-specific)	Monitoring upcoming China RoHS labelling requirements; product-level information will be provided where applicable.
EMC Directive 2014/30/EU	EU	Monitored for applicability	Information on request	Applies primarily to finished equipment; Harwin supports customers with relevant product information where requested.
K-REACH	Korea	Monitored / Information on request	FMD (product-specific)	
Ozone-Depleting Substances (ODS)	Global / EU / UK	Monitored	FMD (product-specific)	Harwin monitors restrictions on ozone-depleting substances in relevant materials and processes. Based on reasonable enquiry and supplier material declarations, Harwin is not aware of any ODSs being present in its products.
Radioactive substances	Various	Monitored	FMD (product-specific)	Harwin can provide information on request to support customer restrictions or screening requirements where applicable. Based on reasonable enquiry and supplier material declarations, Harwin is not aware of any radioactive substances present in its products.

This statement is not exhaustive. Harwin also monitors and addresses other applicable materials and environmental legislation that may apply to specific products, markets, or customer requirements. Product-specific information is available via the relevant FMD and supporting declarations upon request.

If you have any questions about the statements above or require further support, please contact the Harwin Compliance Team via complianceteam@harwin.com

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This overview is based on reasonable enquiry within our supply chain and reflects the information available to Harwin plc at the time of publication. It represents our best knowledge as of the issue date. This statement is issued electronically and is valid without a handwritten signature. It remains valid until superseded. Harwin operates an ongoing development and review programme, and information may change as new data becomes available. For updates or further clarification, please contact complianceteam@harwin.com