

# SUPPLIER COMPLIANCE GUIDELINES

FOR PLACING PRODUCTS ON THE EU-MARKET

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Building Reliability Together

# COULISSE

since 1992

Dear Valued Supplier,

We are delighted to present to you our Supplier Compliance Guidelines, emphasizing the utmost importance of compliance in today's business landscape. As a supplier active on the European Union (EU) market, it is crucial to understand that compliance with European directives and regulations is not only mandatory but also essential to your success.

The EU market represents a vast opportunity for businesses worldwide, attracting customers with its strong purchasing power and high standards of quality and safety. However, gaining access to this lucrative market necessitates adherence to a comprehensive set of compliance requirements outlined by European guidelines.

Compliance with European directives serves as a fundamental prerequisite for any supplier seeking to sell their products in the EU. These regulations cover a wide range of aspects, including product safety, environmental sustainability, data protection, and ethical business practices. By ensuring compliance, you demonstrate your commitment to meeting the stringent standards set forth by the EU, building trust and credibility with all customers in the EU.

Moreover, we believe that this compliance journey presents an excellent opportunity for you as a supplier. By proactively aligning with European regulations, you not only fulfill the requirements for EU market entry but also position yourself as a reliable partner capable of alleviating the compliance burdens for other customers venturing into the European market. This proactive approach not only enhances your competitiveness but also strengthens your reputation as a trustworthy and forward-thinking supplier.

Through this Supplier Compliance Guidelines, we seek to strengthen our collaborative partnership with you, dedicated to upholding the highest compliance standards. Together, we can navigate the intricate landscape of European regulations, ensuring that our products meet the expectations of EU consumers and regulators alike.

We appreciate your commitment to compliance and the invaluable role you play in helping us deliver safe, ethical, and reliable products to our customers in the European Union. We look forward to embarking on this compliance journey together, creating a mutually beneficial relationship that leads to long-term success in the European market.

Sincerely,

Coullisse

Christiaan & Maurice Roetgering



## 1. INTRODUCTION

### 1.1. Purpose of the Supplier Compliance Guidelines

The purpose of these Supplier Compliance Guidelines is to outline the compliance requirements pertaining to different product categories in accordance with applicable laws and regulations. These Supplier Compliance Guidelines therefore serves as a vital tool in ensuring that our suppliers are fully aware of the legal and regulatory requirements that govern their respective product categories. By adhering to these regulations, we can collectively contribute to the delivery of safe, compliant, and high-quality products to our customers while upholding our commitment to regulatory compliance and social responsibility.

### 1.2. Scope

This document serves as a guide for both our organization and our suppliers to ensure that products meet the necessary legal and regulatory standards. By clearly defining the requirements for each product category, we aim to streamline the compliance process and mitigate any potential risks associated with non-compliance.

### 1.3. Structure

The due diligence document is structured into sections, with each section dedicated to a specific regulation. The sections provide a detailed overview of the relevant law, regulations, and directives that apply to that particular category. This includes, but is not limited to, industry-specific regulations, safety standards, labeling requirements, environmental considerations, and any other pertinent compliance criteria.

Please note that the sections contain summaries of the regulatory criteria applicable to the products. For detailed guidance and specific requirements related to the requirements relevant for the products, please check the applicable regulatory framework.

### 1.4. Our expectations

Suppliers are expected to carefully review the relevant section(s) that pertain to their specific product category and ensure full compliance with the outlined regulations. It is imperative that suppliers thoroughly understand the requirements and take appropriate actions to conform to the applicable laws.

By incorporating this due diligence document into our supplier management process, we aim to enhance transparency, minimize compliance risks, and promote a culture of regulatory excellence. Furthermore, it provides a framework for ongoing collaboration and dialogue between our organization and our suppliers, enabling us to work together to achieve and maintain compliance across various product categories.

### 1.5. Amendments to these Supplier Compliance Guidelines

This document will be periodically updated to reflect any changes or updates to the applicable laws and regulations. Suppliers will be notified of any revisions, and their cooperation in implementing necessary adjustments will be greatly appreciated.

### 1.6. Product categories

Recognizing the diverse nature of our supplier base and the wide range of products supplied, it is essential to have a comprehensive understanding of the specific regulations that govern each product category.

Product category	Regulation	Chapter
Textiles	REACH, POP, BPR	3,5,7
Screens	REACH, POP, BPR, PFAS	3,5,7,8
Batteries/accu's	REACH, RoHS, POP, CLP	3,4,5,6
Motors	REACH, RoHS, POP, CLP	3,4,5,6
Wood/ paper packaging	REACH, POP, BPR, EUTR	3,5,7,9
Bamboo	REACH, POP, BPR, EUTR	3,5,7,9
Aluminium	REACH, POP, CBAM	3,5,10
Plastic components	REACH, POP	3,5

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### 3. REACH - REGISTRATION, EVALUATION, AUTHORIZATION, AND RESTRICTION OF CHEMICALS

#### 3.1. Scope products

Product categories: *textile, screens, wood, bamboo, aluminum, batteries, motors, accu's, plastic components*

#### 3.2. Description

REACH applies to products that are manufactured, imported, or used within the EU. This regulation covers a wide range of substances and mixtures, including chemicals, preparations, and articles.

REACH aims to ensure the safe use of chemicals while protecting human health and the environment. It requires businesses to register and provide detailed information on the substances they manufacture in products, especially those of high concern. REACH also restricts or bans the use of certain hazardous substances.

#### 3.3. Our expectations

As a supplier, you are expected to fulfill the following actions in compliance with REACH:

- Identify the substances present in your products that fall within the scope of REACH.
- Ensure that any substances of very high concern (SVHCs) used in your products are below the applicable concentration limits and communicate their presence to downstream users. The supplier is responsible for periodically checking the list of ECHA for added new restricted substances (<https://echa.europa.eu/candidate-list-table>).
- Provide Safety Data Sheets (SDS) and relevant information on the safe handling, use, and disposal of your products, including any restricted substances.
- Collaborate with your supply chain partners to ensure the exchange of necessary information and fulfill your obligations as a downstream user.
- Conduct regular audits to ensure compliance with this regulation.
- Keep records and documentation related to REACH content, testing, and compliance measures.
- Provide us on request with a declaration that the products comply with REACH.

#### 3.4. Importance of compliance

Importance of compliance with REACH: Compliance with REACH is crucial for several reasons:

- Trust of our and your other customers
- Non-compliance may result in penalties, market restrictions, and reputational damage.
- By adhering to REACH requirements, you contribute to the safe handling and use of chemicals, minimizing risks to human health and the environment.
- Compliance with REACH allows your products to enter and remain in the EU market, meeting the expectations of customers, regulators, and other stakeholders.
- Compliance with REACH fosters transparency and responsible practices throughout the supply chain, ensuring the traceability and safe use of chemicals.

## 4. ROHS – RESTRICTION OF HAZARDOUS SUBSTANCES

### 4.1. Scope products

Product categories: *motors, USB-C, batteries, accu's*

### 4.2. Description

The RoHS (Restriction of Hazardous Substances) Regulation applies to electrical and electronic equipment placed on the EU market. It covers a wide range of products, including but not limited to consumer electronics.

RoHS is an EU directive that restricts the use of certain hazardous substances in electrical and electronic products. The substances regulated by RoHS include lead (Pb), mercury (Hg), cadmium (Cd), hexavalent chromium (CrVI), polybrominated biphenyls (PBBs), and polybrominated diphenyl ethers (PBDEs). The maximum allowed concentration limits for these substances are defined under RoHS.

### 4.3. Our expectations

As a supplier, you are expected to fulfill the following actions in compliance with RoHS:

- Identify and assess the presence of restricted substances in your products as per the RoHS directive.
- Ensure that the concentration of restricted substances in your products is below the maximum limits specified by RoHS.
- Maintain records and documentation demonstrating compliance with RoHS requirements, including supplier declarations of conformity and relevant test reports.
- Cooperate with your supply chain partners to exchange necessary information and ensure compliance throughout the product lifecycle.
- Conduct regular audits to ensure compliance with this regulation.
- Keep accurate records and documentation related to RoHS content, testing, and compliance measures.
- Provide us on request with a declaration that the products comply with RoHS.

### 4.4. Importance of compliance

Compliance with RoHS is of significant importance due to the following reasons:

- Compliance with RoHS is a legal requirement for EEE products placed on the EU market. Non-compliance can lead to penalties, product recalls, and market access restrictions.
- RoHS aims to reduce the risks associated with hazardous substances, safeguarding human health and the environment from potential harm.
- Compliance with RoHS is a prerequisite for accessing the EU market, demonstrating your commitment to meeting regulatory standards and consumer expectations.
- RoHS promotes the use of environmentally friendly materials and encourages the development of eco-friendly products, aligning with sustainable business practices.

## 5. POP - PERSISTENT ORGANIC POLLUTANTS

### 5.1. Scope products

Product categories: *motors, batteries, textiles, screens, wood, bamboo*

### 5.2. Description

The POP (Persistent Organic Pollutants) regulations are applicable to a range of products that may contain or be exposed to these substances. This includes various industries such as electronics, textiles, among others.

POPs are toxic industrial chemicals (such as polychlorinated biphenyls, widely used in electrical equipment. The Stockholm Convention on POPs is an international treaty that aims to eliminate or restrict the production, use, and release of these substances.

### 5.3 Our expectations

As a supplier, you are expected to fulfill the following actions in compliance with POP regulations:

- Identify and assess the presence of POPs in your products.
- Ensure that the concentration of POPs in your products is below the maximum limits or restrictions specified by the applicable regulations.
- Maintain records and documentation demonstrating compliance with POP requirements, including supplier declarations and relevant test reports.
- Collaborate with your supply chain partners to exchange necessary information and ensure compliance throughout the product lifecycle.
- Conduct regular audits to ensure compliance with this regulation.
- Keep accurate records and documentation related to POP content, testing, and compliance measures.
- Provide us on request with a declaration that the products comply with POP.

### 5.4. Importance of compliance

Compliance with POP regulations is crucial due to the following reasons:

- POPs pose significant risks to ecosystems and human health. By complying with POP regulations, you contribute to reducing the release and exposure of these harmful substances, protecting the environment and biodiversity.
- Compliance with POP regulations is mandatory in many jurisdictions and regions worldwide.
- Failure to comply can result in legal consequences, reputational damage, and restricted market access.
- POPs have been linked to adverse health effects, including cancer, reproductive disorders, and developmental abnormalities. Complying with POP regulations ensures the safety of consumers and workers handling these products.
- POP regulations align with global sustainability goals by promoting the use of safer alternatives and encouraging the adoption of environmentally friendly manufacturing processes.



## 6. CLP - CLASSIFICATION, LABELLING, AND PACKAGING

### 6.1. Scope products

Product categories: *motors, batteries, USB-C, accu's*

### 6.2. Description

The CLP (Classification, Labelling and Packaging) Regulation applies to substances and mixtures intended for sale or use within the EU. This regulation covers a wide range of products, including chemicals, detergents and paints.

CLP is an EU regulation that sets rules for the classification, labelling, and packaging of hazardous substances and mixtures. It aligns with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). CLP ensures that hazardous chemicals are properly identified, classified, and labeled to protect human health and the environment.

### 6.3. Our expectations

As a supplier, you are expected to fulfill the following actions in compliance with CLP:

- Determine the hazardous properties of your substances and mixtures according to CLP criteria.
- Classify your products appropriately, considering physical, health, and environmental hazards.
- Create accurate and compliant labels and safety data sheets (SDS) for your products, including hazard pictograms, signal words, and precautionary statements.
  
- Keep abreast of updates to the classification and labeling requirements, updating your product information accordingly.
- Conduct regular audits to ensure compliance with this regulation.
- Keep accurate records and documentation related to CLP content, testing, and compliance measures.
- Provide us on request with a declaration that the products comply with CLP.

### 6.4. Importance of compliance

Compliance with CLP is essential for the following reasons:

- CLP ensures that hazardous substances and mixtures are properly classified and labeled, raising awareness among users about potential risks and enabling them to handle products safely.
- Compliance with CLP is mandatory for substances and mixtures placed on the EU market. Non-compliance may result in penalties, market restrictions, and reputational damage.
- CLP aligns with the GHS, facilitating the global harmonization of hazard communication and promoting consistent practices across borders.
- Compliant labeling and classification enhance customer trust, as they can make informed decisions about the safe handling and use of products.

## 7. BPR – BIOCIDAL PRODUCTS REGULATION

### 7.1. Scope products

Product categories: *textiles, screens, wood, bamboo, paper packaging*

### 7.2. Description

The BPR (Biocidal Products Regulation) applies to a wide range of products that contain active substances intended to control harmful organisms. This includes disinfectants, preservatives, pest control products, and other biocidal products used in various industries such as healthcare, agriculture, and household.

The BPR is an EU regulation that aims to ensure the safe and effective use of biocidal products while protecting human health and the environment. It establishes a regulatory framework for the authorization, placing on the market, and use of biocidal products containing active substances.

### 7.3. Our expectations

As a supplier, you are expected to fulfill the following actions in compliance with the BPR:

- Determine if your products fall within the scope of the regulation as biocidal products.
- Ensure that active substances used in your products are approved or under evaluation for their specific intended uses.
- Comply with the labeling, packaging, and safety data sheet requirements specified by the regulation.
- Keep records and documentation demonstrating compliance with the BPR, including product registrations, efficacy data, and information on the safe use of the biocidal products.
- Conduct regular audits to ensure compliance with this regulation.
- Keep accurate records and documentation related to BPR content, testing, and compliance measures.
- Provide us on request with a declaration that the products comply with BPR.

### 7.4. Importance of compliance

Compliance with the Biocidal Products Regulation is crucial due to the following reasons:

- Health and environmental protection: The BPR ensures that biocidal products are properly evaluated and authorized for their intended use, minimizing risks to human health and the environment.
- Market access: Compliance with the BPR is a legal requirement for placing biocidal products on the market within the EU. Non-compliance can result in penalties and restrictions on market access.
- Consumer safety: Compliant biocidal products provide consumers with assurance that the products have undergone rigorous assessments and meet necessary safety standards.
- Sustainable use of biocides: The BPR promotes the sustainable use of biocidal products, encouraging the development and use of safer alternatives and reducing the impact on non-target organisms.

## 8. PFAS - PER- AND POLYFLUOROALKYL SUBSTANCES

### 8.1. Scope products

Product categories: *textiles, screens, plastic components*

### 8.2. Description

PFAS (Per- and Polyfluoroalkyl Substances) restrictions are applicable to various products that contain or may release PFAS compounds. This includes textiles, packaging, water repellents, cleaning products, and other consumer and industrial goods.

Currently, PFAS is primarily regulated within existing laws and regulations, such as REACH.

### 8.3. Our expectations

As a supplier, you are expected to fulfill the following actions in order to achieve compliance with PFAS regulations:

- Collaborate with your supply chain partners to gather necessary information on the presence of PFAS and work towards reducing their use.
- Identify if your products contain PFAS or if PFAS may be present in materials used in your products. Conduct thorough assessments to determine the presence of PFAS in their products or manufacturing processes. The supplier is responsible for periodically checking the list of ECHA for added new restricted substances (<https://echa.europa.eu/candidate-list-table>).
- Comply with any restrictions or regulations regarding the use and content of PFAS in your products.
- Communicate the presence or absence of PFAS in your products to customers and downstream users, as applicable.
- Conduct regular audits to ensure compliance.
- Keep accurate records and documentation related to PFAS content, testing, and compliance measures.
- Provide us on request with a declaration that the products do not contain PFAS.

### 8.4. Importance of compliance

Compliance with PFAS regulations is important for several reasons:

- PFAS have been associated with various health concerns. Compliance helps mitigate these risks and protects human health.
- PFAS are persistent in the environment and can accumulate in organisms. Compliance contributes to reducing PFAS release into the environment, minimizing their impact on ecosystems.
- Many jurisdictions have implemented or are considering regulations and restrictions on PFAS use. Compliance ensures adherence to legal requirements, avoiding penalties and market access issues.
- Compliant products that minimize or eliminate PFAS usage instill confidence in consumers who are increasingly concerned about the potential health and environmental impacts of these substances.

## 9. EUTR – EU TIMBER REGULATION

### 9.1. Scope of Products

Product categories: *wood, bamboo, paper packaging (including flooring, plywood, pulp, and paper)*

### 9.2. Description

The Timber Regulation outlines the obligations of operators, who place timber and timber products on the EU market. The primary goal is to counteract the trade of illegally harvested timber and timber products. As our supplier, it's crucial for you to understand and align with these regulations to ensure a smooth business relationship and compliance with EU laws.

### 9.3. Our Expectations

As our valued supplier, we have set forth the following expectations in line with the Timber Regulation:

- Ensure that all timber and timber products supplied to us have been legally harvested and comply with the laws of the country of harvest.
- Implement and maintain a robust due diligence system. This system should include measures to access information about the source and suppliers of timber products, risk assessment procedures, and risk mitigation steps.
- Maintain comprehensive and accurate records of your timber sources, suppliers, and the due diligence measures you've implemented. This documentation may be requested by us for verification purposes.
- Engage proactively with your supply chain to ensure transparency and the exchange of all relevant information regarding timber sourcing and compliance.
- Be prepared to provide a declaration upon our request, confirming that the supplied products are in compliance with the Timber Regulation.

### 9.4. Importance of compliance

We emphasize the importance of compliance with the Timber Regulation for the following reasons:

- Ensuring compliance is essential for access to the EU market, benefiting both our businesses.
- Upholding the trust of our customers and stakeholders is paramount. Compliance ensures that we maintain our reputation in the market.
- Non-compliance can result in severe penalties, both for you as our supplier and for us as the importer.
- Adhering to the Timber Regulation signifies our joint commitment to sustainable forest management and the fight against illegal logging.
- A transparent and compliant supply chain reinforces responsible business practices and long-term partnerships.

## 10. CBAM – CARBON BORDER ADJUSTMENT MECHANISM

### 10.1. Scope products

Product categories: *aluminium, steel, iron*

### 10.2. Description

The CBAM is legislation designed to prevent carbon leakage by imposing a carbon cost on certain imports into the EU. As our supplier, under CBAM you are required to accurately report the carbon emissions associated with the production of goods exported to the EU. Additionally, you must align your manufacturing practices with environmental standards to reduce overall carbon emissions, ensuring compliance with environmental regulations.

### 10.3. Our expectations

As a supplier, you are expected to fulfill the following actions in compliance with CBAM:

- Align the carbon footprint of your products with EU environmental standards.
- Provide transparent and accurate information about the carbon emissions associated with the manufacturing of goods exported to the EU.
- Adopt and continuously improve sustainable manufacturing practices to reduce overall carbon emissions.
- Work with us to ensure compliance with CBAM regulations, including accurate carbon reporting.
- Conduct regular audits to ensure compliance with this regulation.
- Keep accurate records and documentation related to CBAM content, testing, and compliance measures.
- Provide us, upon request, with a declaration regarding the CO<sub>2</sub> emissions associated with the production of the products

### 10.4. Importance of Compliance

Compliance with CBAM is essential for several reasons:

- By adopting more sustainable practices, you can gain a competitive edge.
- Demonstrates a commitment to reducing global carbon emissions.
- Non-compliance may lead to penalties and restricted market access.
- Upholding environmental standards enhances your reputation among consumers and business partners.

Together, by adhering to the CBAM, we contribute to a more sustainable and environmentally responsible global economy.

## 11. FINAL CHAPTER: OUR EXPECTATIONS

### 11.1 Supplier Commitments

By implementing these Supplier Compliance Guidelines, we endeavor to enhance our joint partnership, steadfast in our commitment to the highest compliance standards. Together, we will ensure our products not only meet, but surpass the expectations of EU consumers and regulatory authorities.

### 11.2 Overview of Commitments

As our supplier, we expect from you:

- Compliance with Laws and Regulations: Ensure that the products and practices comply with relevant local and international laws and regulations.
- Transparency: Maintain open and honest communication about your operations and compliance with these guidelines.
- Sustainable Practices: Actively contribute to sustainable practices in your operations, with special attention to environmental protection and social responsibility.
- Regular Audits: Allow us, or a third party designated by us, to conduct regular audits to confirm compliance with these guidelines.
- Continuous Improvement: Strive for continuous improvement in your processes and practices regarding sustainability and ethics.

### 11.3 Signature Page

By signing below, you, as our valued supplier, acknowledge and commit to the guidelines and expectations outlined in this document. Your signature signifies a formal agreement to adhere to these standards and an understanding of the importance of these commitments in maintaining a responsible and sustainable supply chain.

Company Name:

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Name:

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Title:

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Date:

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This signed document solidifies our partnership based on mutual respect, ethical business practices, and a shared commitment to sustainability and legal compliance. We appreciate your cooperation and look forward to a further fruitful and responsible business relationship.