Prohibition and declaration of substances

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Changes:
Supplier declaration: changes in the tab GROW; update of the tab REACH: new entries into the candidate list January 2022

Change information: AEN 4497R31506 (internal document of the Bosch Group)

Area of validity, binding force, freedom to disclose

<table>
<thead>
<tr>
<th>Valid for</th>
<th>Bosch Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Binding for</td>
<td>RB, TOGE, RG</td>
</tr>
<tr>
<td>Binding due to</td>
<td>Central Directive CD 03800: &quot;Occupational health and safety, fire protection, environmental protection, and emergency control – principles of organization and content&quot;</td>
</tr>
<tr>
<td>Recommended for</td>
<td>BEGE</td>
</tr>
<tr>
<td>Disclosure</td>
<td>No restrictions</td>
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</tbody>
</table>

This Bosch-Norm is binding for suppliers if it is part of the order.
## 1 Subject

The Bosch-Norm N 2580-1 regulates the methods and extent of the notification of prohibited and declarable substances in materials (definition, see section 3) by the supplier to Bosch. It is part of the requirements (specifications) for materials, the supplier and serves the implementation of legal requirements as well as requirements of Bosch customers for materials by Bosch.

The minimum requirements are listed in the annex "Supplier declaration: Bosch Reference List".

**These regulations are valid worldwide.**

## 2 Material responsibility of the supplier

The legal substance and material regulations, other legal requirements or contractual agreements with Bosch in respect to the specific product composition are not affected by this Bosch-Norm and continue to apply. If specific material requirements are agreed with Bosch or reference is made to specific legal provisions, this does not release the supplier from the responsibility to check the validity of further or legal requirements exceeding the contractual agreements and to ensure compliance with them. Where legal regulations are referred to in the following sections, this is done only by way of example or for explanatory purposes.

The supplier is obligated to immediately contact the responsible Bosch purchase department in writing if the legal substance and material regulations, other legal requirements or contractual agreements with Bosch in respect to the specific product composition are not fulfilled or are not applied and implemented due to other reasons.
3 Definition material

According to this Bosch-Norm, material is everything that remains in a Bosch product, what Bosch uses as manufacturing aids, and what Bosch passes on to external customers as packaging. The classification as substance, mixture or product within the meaning of the Regulation (EC) No 1907/2006 (REACh regulation) is not decisive for the qualification as material within the meaning of this Bosch-Norm.

Examples of material:

- Pure substance and mixture
- Component, semi-finished product, material
- Complete product including merchandise
- Soldering material, adhesive
- Lubricant, cooling lubricant
- Degreasing agent, corrosion inhibitor
- Material for sandblasting, hardening, forming
- Packaging including conditioning such as desiccants or corrosion inhibitors
- Advertising material, toys, and food
  - Substance restrictions for this group are not listed in the supplier declaration. For suppliers of advertising material, the latest version of the QAA-Addendum is referred to. A signature process is regulated separately.

4 Information for suppliers

Bosch is authorized to adapt this Bosch-Norm and to replace it with a new version. This Bosch-Norm is updated twice a year, in the first and third quarter of the current calendar year, respectively. The supplier is obligated to obtain the respective currently valid version of the Bosch-Norm from the Internet.

The following information is available under https://www.bosch.com/company/supply-chain/information-for-business-partners/ (www.bosch.com Information for business partners - Quality Regulations and Standards - General quality documents - Prohibition and Declaration of Substances):

- The currently valid version of the Bosch-Norm N 2580-1
- The supplier declaration (Excel file with cover sheet and material declaration)

5 Material change

Changes of supplied materials have to be coordinated with the responsible Bosch purchasing department at an early stage. Details are specified in the Quality Assurance Agreement (QAA).

This applies especially if a material change is mandated by changed legal requirements. In such a case, the supplier has to inform the responsible Bosch purchasing department immediately about the changed legal regulation (source of law, e.g., Annex XVII of the REACh regulation) as well as the implementation measures taken or planned and the planned implementation period.

If the supplier relies on an exception rule provided by law, the supplier has to explain why this exception is applicable, provide the documentation necessary for the same and, in case of time limited exceptions (transitional provision), when a change will take place.

Unless otherwise agreed, the material change has to be completed at least one year before the effective date of the changed legal regulation and/or the expiry of a transitional provision.
6 Trigger for a declaration

The material declaration is required in the following cases:

- A material is sampled, placed on the market or delivered for the first time.
- A declaration was not available so far, however the product continues to be delivered to Bosch and is put into circulation.
- The declaration so far has been incorrect or incomplete. In this case, the supplier is obligated to hand in a corrected version immediately after getting to know about the mistakes in the original declaration or he has been requested to do the same by Bosch. (Note: in case of doubt, the subjective assessment, that a material declaration and/or change of the same is not required, is equivalent to an incorrect or incomplete declaration.)
- The material or substance has been changed.
- There are new substance prohibitions and/or obligations to declare substances (especially according to Section 33 of the REACh regulation) and the supplied material is affected.
- New limit values are applicable and the delivered material is affected, so that the content of the previous declaration is incorrect for the future.
- Changes in the weight of the delivered material exceed the agreed weight tolerances.
- There is an individual request.
- In all cases in which a declaration is legally required.

If one of these cases occurs, the supplier has to submit the declaration to the responsible Bosch contact immediately.

7 Rating of substances

If limit values are listed for material groups, the supplier has to list the respective individual materials.

For manufacturing aids and packaging, the limit value refers to the delivery condition.

7.1 Definition of limit value

If no limit value is specified, the value of 0,1 % mass fraction applies.

Depending on the regulation, the limit value can refer to the following:

- the supplied product
- the material
- the preparation
- the mixture
- the homogeneous material

The definitions of the respective regulations apply.

7.2 Prohibited substances

If attributes deserving protection, prohibited substances or declarable substances are contained in the delivered materials, these prohibited substances or declarable substances have to be disclosed and indicated by the supplier. Contractually agreed further-reaching requirements, e.g., by IMDS, have to be complied with.

**Declarable Substances:** Declarable substances are marked with "D" (Declaration) in the annex "Supplier declaration". The concentration of the substance has to be declared, if it reaches the limit value or if the limit value is exceeded. The declaration of the concentration is recommended if it is below or equal to the limit value.
Prohibited substances: Prohibited substances are marked with “P” (Prohibition) in the annex “Supplier declaration”. They must not be included in the supplied material with a concentration equal to the limit value or above the limit value. A concentration value has always to be specified, even if the concentration of the substance lies below the limit value or reaches the same.

The prohibition and/or the limit value may be related to certain applications. If exceptions from the corresponding regulation are used for a prohibited substance, the exception (e.g., for EU-ELV or EU-RoHS) has to be specified with the exception number (e.g., EU-RoHS 6a) and the concentration of the substance. In addition, the evidence and documentation necessary for the exception regarding the requirements and compliance of the claimed exception have to be provided to Bosch.

8 Rules for passing the material declaration

Declaration can be made for one or several part numbers (family declaration) if the content and concentration of the substance are identical in the materials supplied (e.g., use of the same material in series or product families). The declaration has to refer to all affected Bosch part numbers.

8.1 Declaration formats for material declaration

The N 2580 offers several ways for the material declaration. Each declaration has to show the relation between supplied material and Bosch part number(s).

<table>
<thead>
<tr>
<th>Usage</th>
<th>IMDS</th>
<th>N2580 Supplier declaration (xslm)</th>
<th>CDX</th>
<th>Other material declaration formats (e.g. IPC 1752 or compliance confirmations)</th>
<th>Safety Data Sheet (SDS) (For single substances or mixtures)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automotive</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>(permitted in agreement with the requesting department)</td>
<td>(depending on availability)</td>
<td>(depending on availability)</td>
<td>(permitted in agreement with the requesting department)</td>
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<td></td>
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<tr>
<td>Other sectors/application, Batteries, packaging</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<td>According IMDS Terms of Use (6)(b) and (7)c</td>
<td>(depending on availability)</td>
<td></td>
<td>(depending on availability)</td>
<td>(permitted in agreement with the requesting department)</td>
<td></td>
</tr>
</tbody>
</table>

Preferred declaration formats

8.1.1 Bosch Automotive

The material declaration is made via IMDS (http://www.mdsystem.com) and transmitted to the Bosch IMDS account of Robert Bosch GmbH (ID 202, unless other details are provided). The IMDS recommendations and the Bosch IMDS Data entry guidelines https://assets.bosch.com/media/global/bosch_group/purchasing_and_logistics/information_for_business_partners/downloads/quality_docs/general_regulations/bosch-imds-dateneingabe-leitfaden.pdf must be complied with.

The supplier has to inform the related Bosch purchase contact about a new/updated IMDS data were sent to Bosch.

If IMDS is used, no N 2580 supplier declaration and cover sheet is required.

In case of production materials, whose delivery state and final state are different (e.g., non-crosslinked delivered adhesives, sealing and casting compounds, gels, etc.) an additional material declaration as per 8.1.3 (c) or (d) have to be submitted on request by the ordering department.
If a change is made to used and/or delivered materials or their limit values, for which no adaptation or change of the material declaration by means of IMDS is necessitated and/or planned, Bosch has to be informed about the material change separately and according to section 5.

In case of deliveries to China OEM, a written confirmation of compliance has to be transmitted.

Other material declaration formats (e.g., N 2580 Supplier declaration, IPC 1752) are permitted in consultation with the requesting department.

8.1.2 Bosch business sectors other than under 8.1.1 or applications (e.g. Packaging, Batteries)

(a) Use of the IMDS data available according to 8.1.1

Material declarations by means of IMDS as defined in section 8.1.1 may be used as well in other Bosch business sectors, based on IMDS Terms of Use (6) (b) and (7) (c).

An additional supplier declaration is not required. The duty to notification according to section 5 remains unaffected in case of non-declarable IMDS material changes.

(b) Use of CDX (Compliance Data Exchange)

The N 2580 Bosch Supplier Declaration and Material Declaration in Excel will be replaced successively by CDX (https://public.cdxsystem.com) at Bosch. The requesting Bosch department will notify when CDX has to be used.

(c) N 2580 Bosch supplier declaration and material declaration as Excel

A supplier declaration in the form of the signed cover sheet (in raster format (e.g. PDF)) is required. If there is an obligation to declare, this is done in Excel. The transmission takes place by e-mail, in exceptional cases in paper form.

Notes on the supplier declaration (annex of Bosch-Norm N 2580-1) can be found in the section "How to fill out" and "FAQ" of the supplier declaration and in sections 7 and 8 of this Bosch-Norm.

(d) Other material declaration formats

Other material declaration formats (e.g., IPC 1752) or declarations of conformity are permitted in consultation with the requesting department. If the supplier uses a different declaration format/declaration of conformity, a statement confirming compliance with the legal regulations in the request has to be submitted.

8.1.3 Provision of a safety data sheet (SDS)

For the delivery of substances or mixtures in terms of section 3 no. 1 and 2 of the REACh-regulation, the supplier has to provide a safety data sheet (SDS) as per Art. 31 REACh-regulation.

Along with providing an SDS, an additional material declaration has to be provided on demand by Bosch (as described in sections 8.1.1 and 8.1.2), e.g., for substances and mixtures, which are part of delivered components or end products

- for substances and mixtures that are part of a delivered component or end product
- for substances and mixtures that will be used by Bosch in a component or end product
- according to the definition of US regulation TSCA or REACh Registration

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Independent of the supplier’s obligation to comply with the requirements of the REACh regulation, Bosch points out the observance of the following provisions:

- Declaration requirements for substances of the candidate list
- Declaration requirements for substances and mixtures with safety data sheet
- Obligation to approve substances according to Annex XIV, which are used for production in Europe
  - The supplier has to inform the Bosch contact at least two years before “Sunset date” if such a substance is in use in Europe.
- Prohibition and restrictions of substances according to Annex XVII
- Registration of substances when imported into the European Union
  - Suppliers established outside the European Union have to appoint a natural or legal person within the European Union who will act as a deputy to fulfill the import obligation.
  - The supplier has to contact the Bosch contact as long as he or the deputy has not registered the imported substance before the import.

10 Revision history

<table>
<thead>
<tr>
<th>Date</th>
<th>Change description of the Bosch-Norm</th>
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<tbody>
<tr>
<td>29.04.2020</td>
<td>Bosch-Norm: adaptation of the links in section 6.1.2</td>
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<td>Supplier declaration: see tab &quot;Change History&quot;</td>
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<tr>
<td>11.03.2021</td>
<td>Comprehensive changes of the Bosch-Norm, especially the new duties and responsibilities for the suppliers.</td>
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<tr>
<td>27.09.2021</td>
<td>7.1 Definition homogeneous material deleted</td>
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<tr>
<td></td>
<td>8.1.1 Requirement to inform Bosch about new/updated IMDS</td>
</tr>
<tr>
<td></td>
<td>Supplier declaration: see tab &quot;Change History&quot;</td>
</tr>
</tbody>
</table>

11 Normative references

The following documents are necessary for using this Bosch-Norm. For dated references, solely the indicated edition applies. For undated references, the last edition of the indicated document applies (including all revisions). Intentionally cited historical documents are additionally identified as "H" in the column "Type."

<table>
<thead>
<tr>
<th>No.</th>
<th>Document number (edition date)</th>
<th>Title</th>
<th>Type</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>N 2580-1 Appendix</td>
<td>Supplier declaration</td>
<td>M</td>
</tr>
</tbody>
</table>

Type M = document to be supplied; Z = cited document; H = historical document