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Material Compliance – Topics – 2026

The aim of this information is to raise awareness among all our suppliers about the topic of Material Compliance in general.

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AGENDA

1. **Schaeffler Requirements**
   - Expectations to Suppliers Material Compliance Management Capabilities
2. **Legal Requirements and Changes**
   - Conflict Minerals
   - Critical Raw Materials
   - RoHS (Restriction of Hazardous Substances) Directive 2011/65/EU
   - PFAS (per- and polyfluoroalkyl substances) Regulations
   - Declaration Obligations
3. **Material Compliance Updates**
   - Harmonization of Technical Drawings in Relation to Material Compliance
   - Declaration of conformity (DoC) according to S132030-1 shall be digitalized
4. **Material declaration reporting**
   - Relation between Supplier's PPAP and Material Compliance
   - International Material Data System (IMDS) Information
5. **Material Compliance Contact Addresses**

IMPORTANT

Schaeffler provides this **Material Compliance Newsletter** as a support document for all suppliers, containing information on the latest legal requirements as well as updates to Schaeffler documents and tools.

Schaeffler expects all suppliers to provide products and services of consistently high quality, in full compliance with applicable standards, legal regulations, and contractual requirements, while meeting customer expectations and contributing to customer satisfaction.

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Expectations to Suppliers Material Compliance Management Capabilities

Suppliers must have good knowledge & Compliance with Schaeffler standard S 132030-1 “Prohibited and declarable substances” and provide a correct declaration of conformity (DoC) as well as IMDS declaration (for automotive business). These requirements are also mentioned in the Brochure 2 Production process and product approval for suppliers, point 10, Quality | Schaeffler Germany

Good knowledge of Material Compliance Stakeholder requirements:

- Global legislation, standards & tools (e.g. EU REACh, EU POP, EU ELV, EU RoHS, GADSL, IMDS)
- Customer requirements – automotive & non-automotive

The cooperation of suppliers is hereby acknowledged and appreciated. Suppliers shall provide full cooperation and support with respect to specific material requests.

Suppliers shall provide the annual report for Conflict Minerals and Critical Raw Minerals.

Material Compliance offers **training on S 132030-1 for suppliers**; you can register here Training on S 132030-1 for suppliers | Schaeffler Germany

Collaboration between suppliers and Schaeffler ensures customer satisfaction, business excellence and public reputation.

Material compliance shall ensure compliance with all applicable legal, regulatory, industry-specific, and customer requirements.

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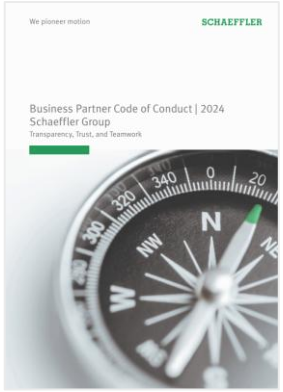
Conflict Minerals

In recent years, the responsible sourcing of minerals and raw materials has become an increasingly important topic in global supply chain management. Through the **CMRT** and **EMRT** reporting processes, companies collect information from relevant suppliers to improve transparency regarding the sourcing of materials that may present social and environmental risks.



Your company is required to comply with Schaeffler's Business Partner Code of Conduct | 2024 Schaeffler Group | Schaeffler Deutschland

To ensure a clean and risk-free supply chain, we conduct an annual collection process for **Conflict Minerals** compliance declarations. For the 2025 reporting year, the supply chain inquiry was completed in February 2026. The reporting rate continued to improve compared with the previous year, reaching **90.38%** for **CMRT** and **78.13%** for **EMRT**.

The reporting process at Schaeffler begins in June and in September is the deadline for Conflict Minerals reports submission.

CMRT covers **3TG** minerals**:**

- ***Tin***
- ***Tantalum***
- ***Tungsten***
- ***Gold***

EMRT covers minerals beyond 3TG:

- ***Cobalt***
- ***Copper***
- ***Graphite***
- ***Lithium***
- ***Mica***
- ***Nickel***

These materials are essential for battery technologies and other advanced applications, and their extraction and processing require careful monitoring throughout the supply chain. The updated version **EMRT 2.11** expands standardized supply chain reporting, as the EU Battery Regulation is increasing due diligence and traceability requirement.

Please note the following **key expectations** regarding the reporting process:

- All reported smelters must be certified by recognized programs such as the Responsible Minerals Assurance Process (RMAP).
- No High-Risk or Sanctioned Sources: Sourcing from conflict-affected and high-risk areas (CAHRAs), sanctioned regions, or smelters located in Russia are not accepted.
- Please provide a complete and transparent reporting through Conflict Minerals Reporting Templates CMRT and EMRT.
- Comply and conduct your due diligence process in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

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Critical Raw Materials

Schaeffler is committed to transparency and responsible due diligence regarding Critical Raw Materials, in line with applicable legal requirements and recognized international standards, including ***Drive Sustainability***, the ***EU CSDDD***, ***the German Supply Chain Act (LkSG)***, ***the Critical Raw Materials Act (CRMA)***, ***the Responsible Minerals Initiative (RMI)***, and ***the Initiative for Responsible Mining Assurance (IRMA)***.

In accordance with the OECD Due Diligence Guidance, the Drive Sustainability Material Change Report, and the CRMA, Schaeffler has established a due diligence management system, including a priority list of raw materials based on product relevance and associated human rights and environmental risks.

Schaeffler currently identifies the following raw materials are listed as top-priority and high-priority critical raw materials for the supply chain: **Aluminum / Bauxite**, **Chromium**, **Glass**, **Iron Ore**, **Magnesium**, **Manganese**, **Molybdenum**, **Platinum Group Metals – Palladium** and **Platinum**, **Plastics**, **Rare Earth Elements**, **Natural Rubber**, **Steel**, and **Zinc**.

Key expectations

- No High-Risk or Sanctioned Sources: Sourcing from conflict-affected and high-risk areas (CAHRAs), sanctioned regions, or smelters located in Russia are not accepted.
- Please provide a complete and transparent reporting through the Additional Minerals Reporting Template (AMRT)
- Comply and conduct your due diligence process in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Monitor or become members of the following channels: Responsible Minerals Initiative (RMI), the Initiative for Responsible Mining Assurance (IRMA).

We recommend reporting at "Company Level", if the final 2026 report is not yet available by 1st of September 2026, please provide an interim report.

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RoHS (Restriction of Hazardous Substances) Directive 2011/65/EU

Previous version status:

- European Commission published delegated three delegated acts on Vovember 21, 2025
- Three delegated acts went into force on **December 11, 2025**
- Directive (EU) 2025/2364: **6(a), 6(b), 6(c):** Lead in copper, aluminum and steel alloys
- Directive (EU) 2025/1802: **7(a):** Lead in high temperature solder
- Directive (EU) 2025/2363: **7(c):** Lead in electrical and electronic components in glass or ceramic materials

Latest Update:

- All **exemptions possible to be renewed** were requested for **renewal in December 2025**
- **Expiry dates** originating from three directives are **omitted due to renewal request**
- **Exemptions** will be **active** until European Commission **decides about the future of exemptions** even if initial **expiry date has been reached**

Exemption (or request for new exemption)	Applicable to categories:	Start	End	Last date of submission	(Renewal) request
Annex III n. 6(a)	all categories	11.12.2025	11.12.2026	11.06.2025	
Annex III n. 6(a)-I	all categories	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	16.12.2025
Annex III n. 6(a)-II	all categories	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	16.12.2025
Annex III n. 6(b)	all categories	11.12.2025	11.06.2027	11.12.2025	
Annex III n. 6(b)-I	1 to 7 and 10	11.12.2025	11.12.2026	11.06.2025	
Annex III n. 6(b)-I	9 industrial	11.12.2025	30.06.2027	30.12.2025	
Annex III n. 6(b)-I	11 other EEE	11.12.2025	30.06.2027	30.12.2025	
Annex III n. 6(b)-II	1 to 7 and 10	11.12.2025	11.06.2027	11.12.2025	
Annex III n. 6(b)-II	9 industrial	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	25.12.2025
Annex III n. 6(b)-II	11 other EEE	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	17.12.2025
Annex III n. 6(b)-III	1 to 7 and 10	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	15.12.2025
Annex III n. 6(b)-III	8 and 9 other than in vitro and industrial	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	11.12.2025
Annex III n. 6(b)-III	8 in vitro	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	15.12.2025
Annex III n. 6(c)	all categories	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	10.12.2025
Annex III n. 7(a)	all categories	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	12.12.2025
Annex III n. 7(a)-I	all categories	11.12.2025	~~31.12.2027~~	~~30.06.2026~~	12.12.2025
Annex III n. 7(a)-II	all categories	11.12.2025	~~31.12.2027~~	~~30.06.2026~~	12.12.2025
Annex III n. 7(a)-III	all categories	11.12.2025	~~31.12.2027~~	~~30.06.2026~~	12.12.2025
Annex III n. 7(a)-IV	all categories	11.12.2025	~~31.12.2027~~	~~30.06.2026~~	12.12.2025
Annex III n. 7(a)-V	all categories	11.12.2025	~~31.12.2027~~	~~30.06.2026~~	12.12.2025
Annex III n. 7(a)-VI	all categories	11.12.2025	~~31.12.2027~~	~~30.06.2026~~	12.12.2025
Annex III n. 7(a)-VII	all categories	11.12.2025	~~31.12.2027~~	~~30.06.2026~~	12.12.2025
Annex III n. 7(c)-I	all categories	11.12.2025	~~30.06.2027~~	~~30.12.2025~~	12.12.2025
Annex III n. 7(c)-II	all categories	11.12.2025	31.12.2027	30.06.2026	
Annex III n. 7(c)-V	all categories	11.12.2025	~~31.12.2027~~	~~30.06.2026~~	12.12.2025

Exemption Renewal needs to be started by EU again and exemptions are valid until EU decision.

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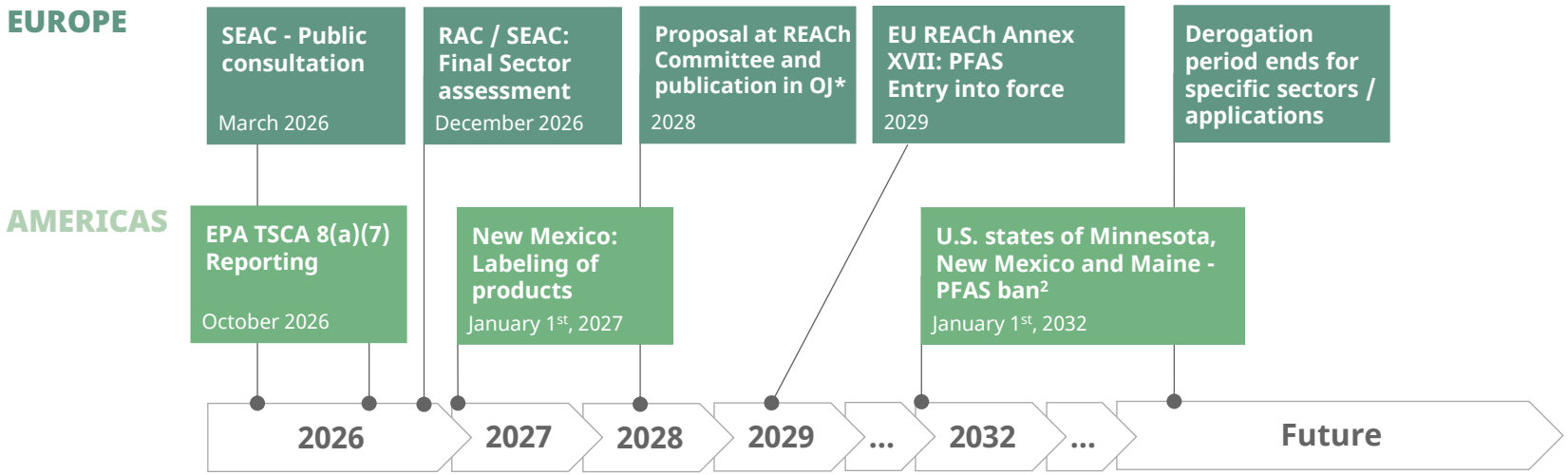
PFAS (per- and polyfluoroalkyl substances) Regulations

Outlook on legislative processes[1] in the EU and North America



Supplier engagement requested

- Global legal monitoring for PFAS restrictions to ensure compliance of sold products
- PFAS-free alternatives should be offered as an option wherever possible

Key Aspects

Schaeffler Group Standard:
Prohibited and declarable substances
(S132030-1)

- **All PFAS must be declared acc. to S132030-1!**
- As reference for PFAS group GADSL is acknowledged
- Suppliers provide proactive support and regularly update their declarations

The cooperation of suppliers is appreciated.

1 Assumption based on information provided by ECHA, Associations; worst case status as of 2026-01-28; 2 Exempt are “currently unavoidable uses” (CUU)
* OJ = Official Journal

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Declaration Obligations

Because Schaeffler has committed to offer **safe and compliant** products, various **Material Compliance** requirements must be passed down the supply chain. Please take over your responsibility by requesting necessary information from your suppliers as well and inform Schaeffler about **regulated substances** in products you provide.

EU REACh Regulation No 1907/2006 requires a **proactive declaration of SVHC** (**S**ubstances of **V**ery **H**igh **C**oncern listed on the "candidate list") with attention to the frequent adaptions of the list.

Recently, the European Commission added **two new substances to the list; the SVHC now contains 253 entries for chemicals.** To review the complete SVHC list, visit the ECHA Candidate List.

Please **inform** Schaeffler **immediately**, if those new substances are present in products you provide above the declaration limit.

Due to several drafted and new regulatory requirements (ESPR (EU 2024/1781) link), hazardous substances, also "**S**ubstances **o**f **C**oncern" (**SOC**) will require declaration within the supply chain. Please be prepared to declare **SOC** to Schaeffler in minimum according to GADSL requirements, using **IMDS** or **S132030-1** declaration formats.

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Harmonization of Technical Drawings in Relation to Material Compliance

Starting with **26.05.2026,** the **text in both environments** (**SAG pre-merger and former VT**) on the drawing will be **updated** and aligned to reflect the latest changes of Schaeffler standard S 132030-1 “Prohibited and declarable substances”

The rule applies to new / updated drawings. For old projects, the former VT process remains applicable.

Please note that the document Quality Process Requirements (QPR) for Design for Environment of Contract Products for former Vitesco Technologies suppliers has been merged to the Schaeffler standard S 132030-1 “Prohibited and declarable substances” (check the above link).

Key actions

- ☑ Supplier shall follow S132030-1
- ☑ Supplier shall submit a declaration of conformity (DoC) acc. to S132030-1
- ☑ Material Data Sheet (MDS) in IMDS is only a part of a DoC

Proactive engagement by suppliers to ensure compliant raw materials and components.

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Declaration of conformity (DoC) according to S132030-1 will be digitalized

DIGITALIZATION IS A KEY LEVER FOR FUTURE READINESS

Current Excel-based format leads to:

- High manual effort
- Uncertainty for filling out Excel-based template
- Long lead-time for completion of a single DoC

Digital solution:
Material Compliance Declaration Tool (MCDT)

- ✓ Standardized workflows
- ✓ Guided questionnaire
- ✓ Automatization
- ✓ Data migration and import for similar components

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Relation between Supplier's PPAP and Material Compliance

Official PPAP requirements acc. to S296900-92 can be found for example on the external website by Schaeffler:

Quality | Schaeffler Germany -> Brochure 2: Production process and product approval for suppliers

No.	Element / requirement	Explanation / comments	Submission level 1	2	3	4	5
10	Material test results and function test results	Material inspection report on all material data in the drawing and all applicable specifications (form, Appendix 3), including OK / not OK rating. Enclose results from raw material supplier as 3.1 inspection certificate to DIN EN 10204	R	S	S	*	R
	Especially Automotive	Ingredients must be entered into the International Material Data System (IMDS). In exceptional cases, the form in appendix of S 132030-1 may be used					
	Schaeffler global	Evidence on the use of prohibited substances and substances requiring declaration in accordance with Schaeffler Standard S 132030-1					
		Inspection report on all function features in the customer drawing and applicable specifications (form, Appendix 2) including OK / not OK rating					

An IMDS datasheet (see **orange marking**), which is mandatory in automotive business and upon project-specific request, represents only the substance declaration and is therefore not sufficient to have the same qualified statement as a DoC, see S132030-1 chapter 1.

The IMDS rules and recommendations as well as all requirements related to IMDS reporting given in S132030-1 must be fulfilled. In addition, the material data sheet (MDS) in IMDS covers not only the substance declaration, but instead all elements of a MDS, like additionally recycled material reporting.

Therefore, for automotive and project-specific requests, a Material Data Sheet (MDS) in IMDS shall be created in accordance with S132030-1 and the latest IMDS rules and recommendations.

A declaration of conformity (DoC) acc. to S132030-1 “Prohibited and declarable substances” is a qualified statement by suppliers for the relevant component / (raw) material (see **green marking**), that the legal obligations are fulfilled.

To assess the conformity of our sold products, a DoC for each delivered good is needed. That's why this requirement is valid for all suppliers of each divisions by Schaeffler globally.

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International Material Data System (IMDS) Information

The **I**nternational **M**aterial **D**ata **S**ystem (**IMDS**) is the automotive industry standard for material data reporting and supports compliance with legal and customer-specific requirements regarding restricted substances.

Supplier shall submit MDSs to the IMDS Organization IDs listed below and ensure that they comply with the current IMDS recommendations and guidelines, as well as **Appendix B: IMDS guideline for Schaeffler suppliers,** as part of S132030-1 Schaeffler Prohibited and declarable substance requirements:

- **Schaeffler Group** IMDS recipient ID **282** for former Schaeffler business – having the PN with 13 digits, in notation xxxxxxxxx-xxxx with the last four digits separated by a "-" without any other additions in front of or behind the number.

- **Vitesco Technologies** for former Vitesco business recipient ID 220896
- **Vitesco Technologies suborganization** unit for former Vitesco business recipient **ID 248991** (mainly two-wheels business)

-> Both having the PN with 11 or 13 digits, in notation AAAxxxxxxxxxx without any other additions in front of or behind the number.

From **April 2026** onward, in line with the **update of the Recommendation 001** which describes IMDS General Rules and Guidelines, suppliers shall update their IMDS declarations within the Change Management process (chapter 3.2) if their declarations are affected by any IMDS rule changes specified in the official IMDS recommendations and guidelines.

All Schaeffler suppliers are expected to monitor official IMDS rule changes and take the appropriate actions accordingly the IMDS.

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Material Compliance Contact Information

For general questions related to Material Compliance topics, please contact us at MaterialCompliance@schaeffler.com.

Technical questions regarding S132030-1 "Prohibited and declarable substances"

- or-hza-s132030-1@schaeffler.com

IMDS

- IMDS@schaeffler.com

REACH / RoHS

- REACh-RoHS@schaeffler.com

For the latest news and updates, please follow the official channels:
REACh : https://echa.europa.eu/
RoHS: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011L0065-20210401

In case of no information from your, side we will consider that the declarations of compliance previous received are still valid.

Conflict Minerals and **Critical Raw Materials**

- ConflictMinerals@schaeffler.com
- CriticalRawMaterials@schaeffler.com

Please respect all legal requirements to ensure a good quality of the material declarations in terms of Material Compliance.

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