



**ZAPI STANDARD**

**Doc. N°** ZPSF-2024-0020

**Date** 16/06/2026

**Rev. N°** 03

# ***PRODUCT COMPLIANCE (Prohibition and Declaration of Substances)***

<b>Revision #</b>	<b>Date</b>	<b>Changes</b>	<b>Definition</b>	<b>Check</b>	<b>Approval</b>
00	12/04/2023	New release	Zapi HSE Supervisor	Zapi Quality Manager	Quality&HSE Group Director
01	07/05/2024	New layout, general review	Zapi HSE Supervisor	Zapi Quality Manager	Quality&HSE Group Director
02	22/10/2024	Reach Annex XVII	Zapi HSE Supervisor	Zapi Quality Manager	Quality&HSE Group Director
03	16/06/2026	Introduction of POP compliance and management of any exemptions	Zapi HSE Supervisor	Zapi Quality Manager	Quality&HSE Group Director

## 1. Scope / Obiettivo:

ZAPI GROUP is committed to ensuring that our products meet the highest standards of quality, safety, and sustainability, and this document represents an fundamental requirement in our commitment to this goal.

In today's regulatory landscape, where the complexity of regulations continues to grow and the attention of consumers and stakeholders increasingly focuses on sustainability, product compliance and substances of concerns managing, it is essential for companies to operate in compliance with these requirements. Non-compliance can not only lead to legal and penal sanctions but also severely damage company reputation and undermine consumer trust.

Assent Inc. is contacting suppliers for the purpose of collecting regulatories survey data (notification of prohibited and declarable substances in materials) on ZAPI GROUP behalf. In order to comply with regulatory requirements, we ask all our Suppliers to cooperate to Assent Inc. and provide requested data according to provided instructions.

In addition to the requirements in the list below, all mandatory and binding regulations (legal requirements) for the materials and markets of interest must be considered.

*ZAPI GROUP si impegna a garantire che i propri prodotti soddisfino i più elevati standard di qualità, sicurezza e sostenibilità e questo documento rappresenta un requisito fondamentale del nostro impegno in tal senso.*

*Nell'attuale panorama normativo, in cui la complessità dei regolamenti continua a crescere e l'attenzione dei consumatori e degli stakeholder si concentra sempre più sulla sostenibilità, sulla conformità dei prodotti e sulla gestione delle sostanze a rischio, è fondamentale per le aziende operare in conformità a questi requisiti. Il non rispetto di questi non solo può portare a sanzioni legali e penali, ma può anche danneggiare gravemente la reputazione dell'azienda e minare la fiducia dei consumatori.*

*Assent Inc. contatterà i fornitori per raccogliere i dati dell'indagine normativa (notifica di sostanze vietate e dichiarabili nei materiali) per conto di ZAPI GROUP. Al fine di rispettare i requisiti normativi, chiediamo a tutti i nostri fornitori di collaborare con Assent Inc. e di fornire i dati richiesti secondo le istruzioni fornite.*

*Oltre ai requisiti della lista sottostante devono essere considerati tutti i regolamenti obbligatori e cogenti (requisiti legali) per i materiali ed i mercati di interesse.*

## 2. Definition material

Material is everything that remains in the product/part delivered to ZAPIGROUP plants, what ZAPIGROUP uses as manufacturing aids, and what ZAPIGROUP passes on to external customers as packaging.

Examples of material:

- Pure substance and mixture
- Component, semi-finished product, material
- Complete product /parts
- Soldering material, adhesive
- Lubricant, cooling lubricant
- Degreasing agent, corrosion inhibitor
- Material for sandblasting, hardening, forming
- Packaging including conditioning such as desiccants or corrosion inhibitors

*Materiale è tutto ciò che rimane nel prodotto/pezzo consegnato agli stabilimenti ZAPIGROUP, ciò che ZAPIGROUP utilizza come ausili per la produzione e ciò che ZAPIGROUP consegna ai clienti esterni come imballaggio.*

*Esempi di materiali:*

- *Sostanza pura e miscela*
- *Componenti, semilavorati, materiali*
- *Prodotto/parti complete*
- *Materiale di saldatura, adesivi*
- *Lubrificanti, emulsioni*
- *Agente sgrassante, inibitore di corrosione*
- *Materiale per sabbiatura, tempratura, formatura*
- *Imballaggio comprensivo di condizionamenti quali essiccanti o inibitori di corrosione*

### 3. Requirements / Requisiti:

<b>Product Compliance</b>		
<b>Regulatory - <i>Regolamento</i></b>	<b>Link</b>	<b>Applicability and notes</b> <i>Applicabilità e note</i>
<b>REACH</b> (EC)1907/2006 & 76/769/EEC (ANNEX XVII) concerning the Registration, Evaluation, Authorization and Restriction of Chemicals	<a href="https://echa.europa.eu/regulations/reach/understanding-reach">https://echa.europa.eu/regulations/reach/understanding-reach</a>	All the parts delivered to ZAPI Group *Exemptions to be approved with HSE Responsible of each ZAPI GROUP company <i>Tutte le parti consegnate a ZAPI GROUP</i> *Esenzioni da approvare da parte Responsabile HSE di ciascuna company ZAPI GROUP
<b>TSCA</b> , Toxic Substances Control Act.	<a href="https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act">https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act</a>	All the parts delivered to ZAPI Group *Exemptions to be approved with HSE Responsible of each ZAPI GROUP company <i>Tutte le parti consegnate a ZAPI GROUP</i> *Esenzioni da approvare da parte Responsabile HSE di ciascuna company ZAPI GROUP
<b>ROHS</b> , European Union's Directive 2002/95/EC	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32002L0095">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32002L0095</a>	All the parts delivered to ZAPI Group <i>Tutte le parti consegnate a ZAPI GROUP</i>
<b>Proposition 65</b>	<a href="https://oehha.ca.gov/proposition-65">https://oehha.ca.gov/proposition-65</a>	All the parts delivered to ZAPI Group *Exemptions to be approved with HSE Responsible of each ZAPI GROUP company <i>Tutte le parti consegnate a ZAPI GROUP</i> *Esenzioni da approvare da parte Responsabile HSE di ciascuna company ZAPI GROUP
<b>IMDS</b> , International Material Data System	<a href="https://www.mdssystem.com/imdsn-t/faces/login">https://www.mdssystem.com/imdsn-t/faces/login</a>	If requested during pre production phase (requested for automotive supply chain) Se richiesto durante la fase di pre-produzione (richiesto per la catena di fornitura automobilistica)

<b>PFAS</b> , perfluorinated alkylated substances	<a href="https://www.epa.gov/pfas/pfas-explained">https://www.epa.gov/pfas/pfas-explained</a>	All the parts delivered to ZAPI Group Tutte le parti consegnate al Gruppo ZAPI
<b>POP</b> , perfluorinated alkylated substances	<a href="http://chm.pops.int/">http://chm.pops.int/</a>	All the parts delivered to ZAPI Group <i>*Exemptions to be approved with HSE Responsible of each ZAPI GROUP company</i> Tutte le parti consegnate a ZAPI GROUP <i>*Esenzioni da approvare da parte Responsabile HSE di ciascuna company ZAPI GROUP</i>

<b>Regulatory - Regolamento</b>	<b>Link</b>	<b>Applicability and notes</b> <i>Applicabilità e note</i>
<b>Conflict Minerals (CMRT)</b>  <b>Extended Minerals (EMRT)</b>	<a href="https://ec.europa.eu/trade/policy/in-focus/conflict-minerals-regulation/regulation-explained/index_en.htm">https://ec.europa.eu/trade/policy/in-focus/conflict-minerals-regulation/regulation-explained/index_en.htm</a>  <a href="https://www.responsiblemineralsinitiative.org/reporting-templates/emrt/">https://www.responsiblemineralsinitiative.org/reporting-templates/emrt/</a>	Company level request Richiesto a livello di azienda