

Company Standard ☒

Instruction ☐

Aim and purpose

As a responsible manufacturer, the Nordex Group, together with all external suppliers, contractors, and subcontractors acting on its behalf, aims to use substances responsibly, in a way that does not endanger our employees, contractors, or other stakeholders, including the environment in which we work.

This document outlines an approach designed to

- ensure legal compliance within all the international and national legislative frameworks which apply to our operations
- minimize the risk to our employees and contractors
- minimize risk to the environment in which our activities are conducted
- ensure accurate information is available for statutory disclosures.

Validity

Global ☒	Regional ☐	Choose an option
Countries	All	
Others		
Valid from	23 June 2026	
Responsible department	QHSE	
Owner (name / function)	David Goodfellow / HSE	
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1. Abbreviations and Terms

Abbreviation/Term	Description
DNSH	Do No Significant Harm (criteria in EU Taxonomy regulations)
ECHA	European Chemicals Agency
GLF	Global Lead Function
PEP	Product Evolution Process (Nordex new product development process)
PFA	Per- and polyfluoroalkyl substances
POP	Persistent organic pollutants
REACH	Registration, evaluation, authorisation and restriction of chemicals (EU Regulation)
RoHS	Restriction of Hazardous Substances (EU Regulation)
SCIP	SCIP is the database for information on ☐ Substances of ☐ Concern ☐ In articles as such or in complex objects (P roducts) established under the Waste Framework Directive (WFD).
SDS or MSDS	Material Safety Data Sheet
SoC	Substance of Concern
SVHC	Substance of Very High Concern (REACH classification)
TSC	Technical Screening Criteria (within REACH) https://ec.europa.eu/finance/docs/level-2-measures/taxonomy-regulation-delegated-act-2021-2800-annex-1_en.pdf page 193
WFD	Waste Framework Directive (EU Regulation)

2. In Scope

This policy applies to all activities within the Nordex Group **as well as to all external suppliers, contractors, service providers, and subcontractors acting on behalf of the Nordex Group**, where such activities involve the specification, purchase, use, storage, handling, transport, or disposal of hazardous chemicals, hazardous materials, hazardous substances, products containing potentially hazardous ingredients, or dangerous goods

3. Out of Scope

Nothing

4. Introduction

The transport, handling, use, and disposal of certain materials can pose hazards to people and/or the environment. The responsible selection, evaluation, and use of materials by both Nordex Group and external parties acting on its behalf can significantly reduce these risks.

This standard defines the legal and additional requirements governing the use of hazardous materials within the Nordex Group and by external service providers, contractors, and suppliers performing work for or supplying materials to the Nordex Group. It specifies which hazardous materials must not be used and identifies materials that may only be used under defined conditions or with appropriate control measures in place.

Compliance with this standard is mandatory for all internal activities and for all external parties involved in the supply, transport, handling, use, or disposal of materials for Nordex Group, unless explicitly agreed otherwise in writing.

5. Requirements Framework

As a company with headquarters situated within the EU, the Nordex Group has a legal responsibility to report on its worldwide usage of chemicals under the EU Taxonomy Regulations (Reg (EU) 2020/852). This requires us to demonstrate whether our global operations meet the Do No Significant Harm (DNSH) criteria by not using specified chemicals. The restricted chemicals are listed in the Technical Screening Criteria (Appendix C) as those defined within the following regulations:

- | | |
|--|---------------------------------|
| a. Annexes I or II to Regulation (EU) 2019/1021 | [Persistent organic pollutants] |
| b. Article 2 of Regulation (EU) 2017/852 | [Mercury] |
| c. Annexes I or II to Regulation (EC) No 1005/2009 | [Ozone depleting] |
| d. Annex II to Directive 2011/65/EU | [RoHS] |
| e. Annex XVII to Regulation (EC) 1907/2006 | [REACH restrictions] |
| f. Article 57 and 59(1) of Regulation (EC) 1907/2006 | [REACH SVHC / Candidate list] |
| g. Article 57 of Regulation (EC) 1907/2006 | [REACH proposed SVHC] |

Notes:

1. SDS must not be older than 2 years or the supplier must confirm that it is up to date. Nordex requirement.
2. Reach Annex 17 identifies substances which have restrictions regarding their use. These restrictions are identified within the SDS for each substance.
3. REACH Article 59 identifies Substances of Very High Concern (SVHC) within the Candidate List.
4. SDS section 15.1 identifies relevance of substance to a, c, e, f, g above.

The Nordex Group has created an internal guideline "Black and Grey list" based on the above criteria. In addition, Substances of Concern (SOC) are identified by the Nordex Group due to their potentially harmful properties. See Appendix.

External companies acting on behalf of Nordex are fully responsible for adapting and implementing these guidelines in accordance with all applicable national and local regulatory requirements.

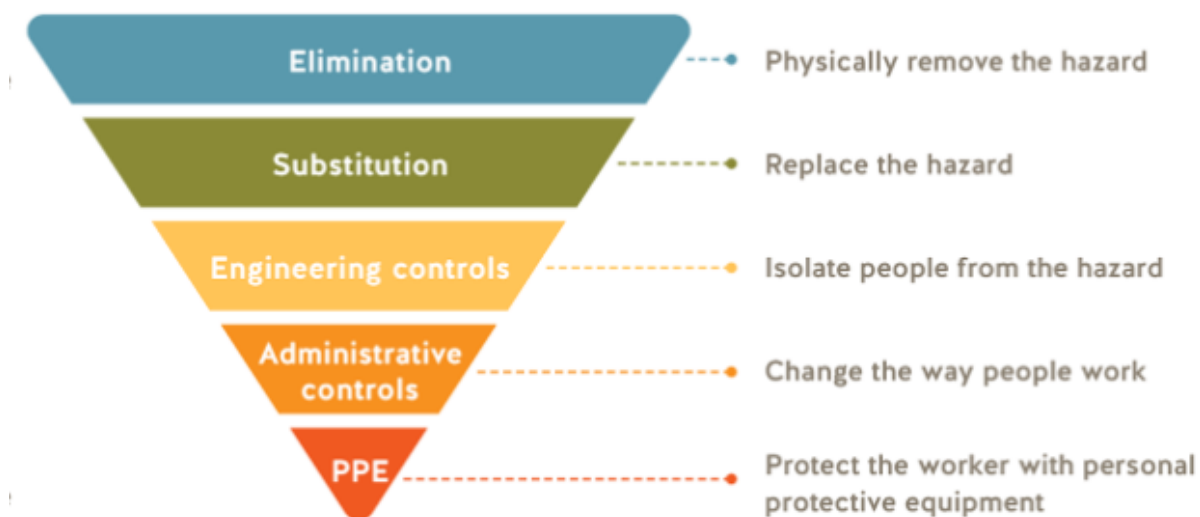
This responsibility includes ensuring that no hazardous materials prohibited under local legislation are used, providing appropriate risk assessments for the handling, storage, use, and disposal of substances in the stipulated format and language, and establishing additional control measures, including health surveillance or medical examinations, where legally required.

5.1. HSE Risk Reduction:

Nordex Group assesses each chemical in use, using information in the Safety Data Sheets (SDS) to analyze the:

- H Phrases: to identify if the H Phrase for the mixture is contained within the Nordex black and grey list (SDS Section 2 para 1)
- Water Hazard Class: to identify if the mixture is classified as Hazard Class 3 which is prohibited and contained within the Nordex Grey list. (SDS Sections 12, 15)
- Status under other categories within the Black and Grey list

Any hazardous materials which appear on the Black and Grey list are identified, and action plans put into place based on the following hierarchy.



5.2. Product Design Process:

HSE specialists assigned to Engineering projects **within the Nordex Group or acting on behalf of Nordex** ensure that any new hazardous materials proposed by internal functions or external service providers, contractors, or suppliers are fully evaluated and approved.

5.3. Hazardous substances in article:

The Supplier shall comply with Regulation (EC) No. 1907/2006 (REACH), in particular Article 33. The Supplier shall, without undue delay, inform the Customer in writing if any supplied article contains a Substance of Very High Concern (SVHC) listed on the Candidate List in a concentration above 0.1% w/w, and provide the required information for safe use, including at least the substance name.

The Supplier further warrants that all products supplied are free from substances prohibited or restricted under applicable legislation, including, but not limited to,

- REACH (Annex XVII)
- POPs Regulation (EU) 2019/1021
- RoHS Directive 2011/65/EU
- ELV Directive 2000/53/EC
- CLP Regulation (EC) No. 1272/2008
- Turkish REACH (KKDIK)
- US TSCA (Section 6)
- where applicable California Proposition 65
- China RoHS 2 (Administrative Measures for the Restriction of Hazardous Substances in Electrical and Electronic Products)
- China REACH (MEE Order No. 12 – Measures for Environmental Management of New Chemical Substances)
- Applicable Moroccan legislation on product safety, hazardous substances, and environmental protection
- The Supplier further warrants compliance with all other applicable laws, regulations, directives, ordinances, and governmental requirements relating to product safety, hazardous substances, chemical management, environmental protection, and restricted substances, including any amendments, recasts, replacements, or successor legislation thereto, whether specifically listed above or not.

For products with a potential risk of containing prohibited substances (e.g. asbestos, PAHs, or restricted flame retardants), the Supplier shall provide, upon request, verifiable evidence such as test reports or third-party certificates from an independent and accredited body.

The Supplier shall ensure compliance throughout the entire supply chain, including sub-suppliers, and maintain auditable documentation and full traceability, to be provided upon request.

5.4. Global Sourcing:

Nordex Group must report on its global operations under the EU Taxonomy regulations. This means that all hazardous materials must be assessed under the EU legal framework.

Whilst most hazardous materials are specified from within the EU, some are still sourced locally.

Therefore, Nordex Group requests that suppliers of hazardous materials who are based outside of the EU provide information consistent with EU Safety Data Sheet (SDS) requirements, including details on the components of mixtures and the hazard and risk phrases relevant to the mixture itself. These documents shall be provided in a format and language compliant with applicable regulatory requirements and can then be evaluated as described in section 6.1.

In addition, suppliers are responsible for ensuring that all substances and materials comply with applicable import, registration, and notification requirements when such substances or materials are introduced into the EU or into other countries with specific regulatory requirements for the import or registration of substances or materials.

For the import of chemical substances into the European Union, suppliers must ensure that the substances are duly registered in accordance with the REACH Regulation. Furthermore, the supplier must either be established within the EU or have appointed a legally compliant **Only Representative** within the EU in accordance with REACH requirements. Compliance with these obligations remains the sole responsibility of the supplier.

5.5. Transport of goods:

Nordex Group operates globally. All parties involved must refer to the international and local regulations to develop transport plans and relevant documentation.

5.6. Use of hazardous materials:

Nordex Group operates globally. All parties involved must refer to the central database and local regulations to develop operational guidance for the use of hazardous materials.

6. Change Management:

External service providers and suppliers performing work on behalf of the Nordex Group are responsible for continuously monitoring and complying with all applicable regulatory requirements, including any legal or regulatory changes relevant to hazardous materials (e.g. periodic updates to the REACH Regulation).

Nordex Group reserves the right to review such regulatory developments, to define internal requirements that may exceed minimum legal obligations, and to update this document accordingly in order to ensure a consistently high level of health, safety, and environmental protection.

Where activities are transferred to the Nordex Group from external parties and such activities involve the introduction of new hazardous materials, these materials shall be assessed in accordance with the same processes applied to newly introduced materials, and appropriate actions shall be implemented.

A cross-business, interdisciplinary working group within the Nordex Group oversees and monitors the implementation and completion of all actions aimed at reducing risks associated with hazardous materials.

7. Use of Prohibited, Restricted, and Internally Listed Materials

(1) Absolute Prohibition of Legally Banned Materials

The use, procurement, manufacture, handling, storage, or placing on the market of any materials, articles, substances, or mixtures that are **prohibited under applicable laws or regulations** is **strictly forbidden**.

This includes, but is not limited to, prohibitions arising from **REACH, CLP, OSHA**, and any other applicable national or international legal, regulatory, or governmental requirements.

(2) Internal Blacklist – Restricted Materials

Materials listed on the Company's **internal blacklist** are subject to a general **avoidance and substitution requirement**.

Where it can be demonstrated that **no technically, economically, or operationally feasible substitute** is available; the use of such materials may be permitted for specific processes following risk assessment and implementation of necessary controls. Such permission will be valid for a maximum of two years before review. Release is required from functional management and documentation of the decision must be recorded in the system."

(3) Conditions for Exceptional Use

Exceptional use pursuant to Section (2) is permitted solely under the following conditions:

- A **documented substitution assessment** has been conducted and demonstrates the lack of a suitable alternative;
- All **necessary risk control and safety measures** have been fully implemented, including but not limited to:
 - appropriate **environmental protection measures**,
 - adequate **technical and organizational controls**, and
 - provision and mandatory use of suitable **personal protective equipment (PPE)**;
- Continued compliance with all **applicable legal minimum requirements** is ensured at all times.

(4) Right to Request Evidence

The Company expressly reserves the right to **request, review, and verify** documentation demonstrating the conducted substitution assessment and the implemented risk mitigation measures at any time. Such documentation shall be provided **without undue delay upon request**.

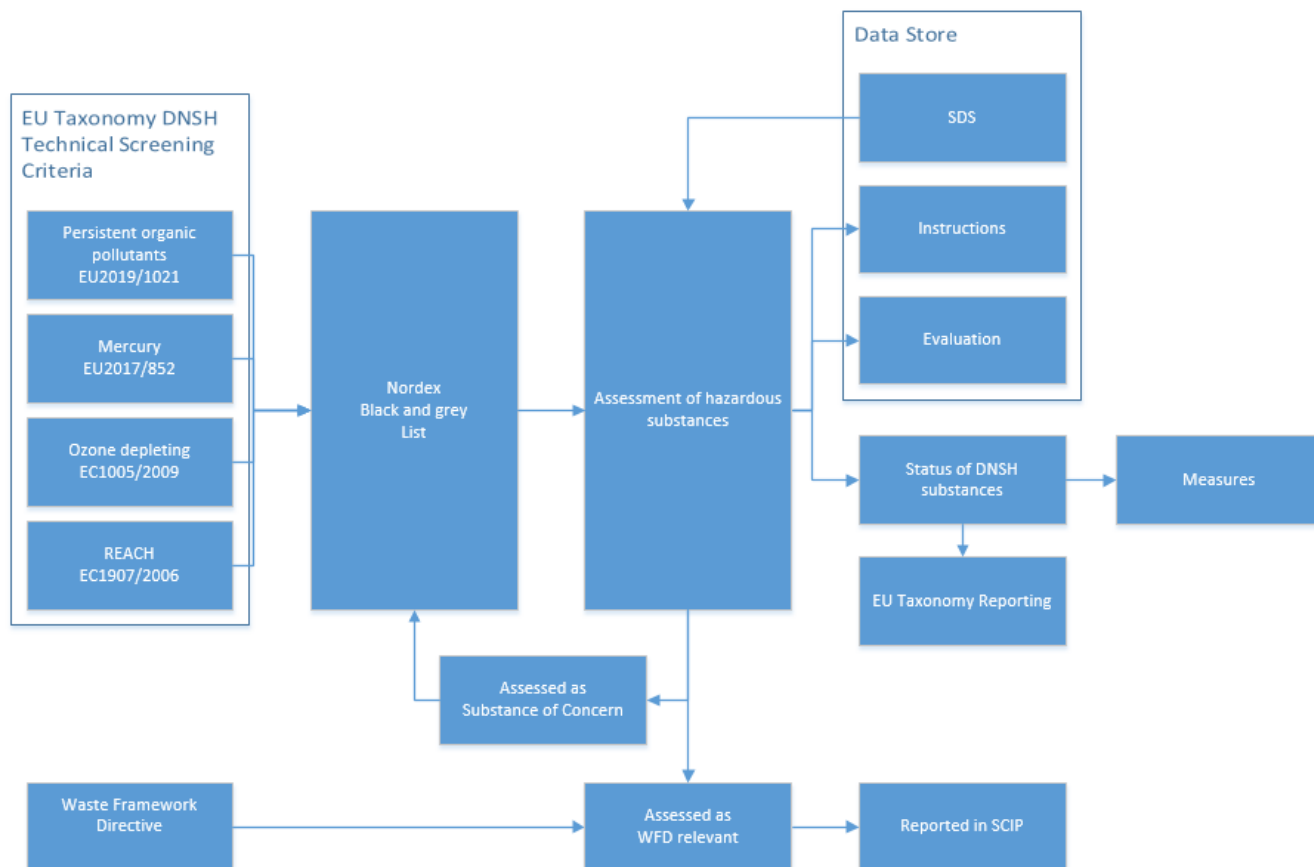
(5) Amendment and Revocation

This policy may be **amended, supplemented, or withdrawn at any time**, in particular due to changes in applicable legislation, regulatory requirements, technical developments, or internal risk assessments. No entitlement to a permanent exemption or continued use of any restricted material shall arise from this provision.

Hazardous Materials Corporate Guideline for external

Appendix 1 - Diagram showing legislation and activities

Note: This is not a process flow but shows the interrelationship between EU legislative articles and the Nordex Group activities, specifically to understand how the EU Taxonomy informs and also receives output from the process.



Appendix 2 - Black and Grey List

Category	Black list Use not allowed	Grey list Controls regarding use must be evaluated and contained in working instructions.
Persistent organic pollutants (POP)	All chemicals specified within Annexes I or II to Regulation (EU) 2019/1021	
Per- and Polyfluoroalkyl substances (PFAS)	Acc. the actual guideline and timeframe from the ECHA	
Mercury	All mercury containing products within definitions contained in Article 2 of Regulation (EU) 2017/852 . Exclusion allowed for calibration equipment	
Ozone depleting	All substances listed in Annexes I or II to Regulation (EC) No 1005/2009	
RoHS	All substances listed in Annex II to Directive 2011/65/EU	
REACH/CLP/ GefahrStoffV /TRGS600	Any chemical product with the following H Phrases: H200, H201, H202, H203, H204, H205, H209, H210, H211, H230, H231, H232, H240, H241, H250 (cat. 1), H260 (cat. 1), H271, H282 H300, H301, H310, H311, H314 (cat. 1,1A), H330, H331, H340, H341, H350, H350i, H351, H360, H360D, H360Df, H360F, H360FD, H360Fd, H370, H372 H310+H330, H301+H311 EUH001, EUH029, EUH031, EUH032, EUH070, EUH203 Any hazardous material listed as prohibited in Appendix 14 or 17, or on the candidate list	Any chemical product with the following H Phrases: H220, H221, H224, H280, H283, H284 H302, H312, H314 (cat. 1B,1C), H317, H318, H332, H334, H361, H361d, H361f, H361fd, H362, H371, H373 H302+H312+H332 H400, H401, H402, H410, H411, H420, H421, H441 EUH018, EU019, EUH032, EUH044, EUH071 Any hazardous material used in line with restrictions specified in Appendix 14 or 17, or on the candidate list
Radioactive substances	All radioactive substances other than exceptions specified in grey list	Where a low-level source is included in detection equipment.
Germs / biological agents	All	
Water Framework Directive	Items in Annex 8 and 10	Items identified in SDS section 15 as Water Hazard Class 3 (restrictions on handling and storage volumes)

Appendix 3 - EU Taxonomy DNSH screening criteria

- a. Substance, whether on their own, in mixtures or in articles, listed in Annexes I or II to Regulation (EU) 2019/1021 (Recast Regulation on Persistent Organic Pollutants), except in the case of substances present as an unintentional trace contaminant;
- b. Mercury and mercury compounds, their mixtures and mercury-added products as defined in Article 2 of Regulation (EU) 2017/852 (Regulation on Mercury);
- c. Substances, whether on their own, in mixtures or in articles, listed in Annex I or II to Regulation (EC) No 1005/2009 (Regulation on Substances that Deplete the Ozon Layer);
- d. Substances, whether on their own, in mixtures or in an articles, listed in Annex II to Directive 2011/65/EU (recast Regulation on the restriction of the use of certain hazardous substances in electrical and electronic equipment) except where there is full compliance with Article 4(1) of that Directive;
- e. Substances, whether on their own, in mixtures on in an article, listed in Annex XVII to Regulation (EC) 1907/2006 (Regulation on the registration, evaluation, authorisation and restriction of chemicals), except where there is full compliance with the conditions specified in that Annex;
- f. Substances, whether on their own, in mixtures on in an article, meeting the criteria laid down in Article 57 of Regulation (EC) 1907/2006 (Regulation on the registration, evaluation, authorisation and restriction of chemicals) and identified in accordance with Article 59(1) of that Regulation for the society; and
- g. Other substances, whether on their own, in mixtures or in an article, that meet the criteria laid down in Article 57 of Regulation (EC) 1907/2006 (Regulation on the registration, evaluation, authorisation and restriction of chemicals), except where their use has been proven to be essential for the society.