

## 1.0 Purpose

The Nordson Restricted Substance Supplier Standard (RSSS) defines the responsibilities and requirements of all suppliers of parts to Nordson, and their sub-tier suppliers who supply parts used in Nordson end products, to ensure product compliance, currently and in the future, to applicable national, state and local Restricted Substance Directives and Regulations in all markets where Nordson products are sold.

## 2.0 Scope

This standard defines the Nordson requirements pertaining only to Restricted Substances (RS) and is not a complete or comprehensive listing of all Nordson regulatory compliance requirements. It is intended to identify the minimum requirements. In the event that applicable law is stricter than this Standard, the supplier should comply with the applicable law. Additional and/or stricter restrictions may be applied by Nordson on a case-by-case basis as required.

This Standard applies to:

- All raw materials, components, subassemblies, and assemblies (parts) that are supplied to Nordson Corporation and/or its affiliates and subsidiaries (Nordson) and used in our end product (including promotional or other free-of-charge items)
- All sub-tier suppliers who supply parts used in Nordson end products
- Nordson designed and "off-the-shelf" parts

This Standard **does not** apply to:

- Process chemicals/materials (i.e. used and consumed during manufacture), unless those materials physically remain in the part supplied to Nordson
- Materials supplied to support the facility or manufacturing process, unless those materials physically remain as a component of our end product
- Suppliers of services or outside work, except when additional material is supplied (i.e. plating)
- Trade compliance requirements
- Transportation compliance requirements
- Product safety requirements, including UL, CSA, FDA and other similar requirements

## 3.0 Responsibilities

### 3.1 Process Controls

Suppliers are responsible for establishing and maintaining an effective Restricted Substance Compliance Assurance System. This system should contain the documented processes necessary to ensure conformance of parts delivered to Nordson, including: design and process controls, supply chain controls, compliance data collection and verification, self-audits, and record keeping.

Suppliers are responsible to ensure that any non-conformances are corrected and that the appropriate root-cause is identified. Corrective actions must be implemented prior to any part being used in Nordson products. Nordson reserves the right to conduct its own audits of suppliers' part level conformance and Compliance Assurance Systems.

### 3.2 Product Controls

- Suppliers shall provide compliance documentation prior to initial delivery of parts, and throughout the production lifetime as required by Nordson (i.e., through supplier polling)
- Suppliers shall collect appropriate declaration data from their supply chain to support the declarations made to Nordson
- Suppliers shall not make material changes without Nordson approval
- Any potential material change shall be reviewed against the RSL prior to submittal to Nordson
- Suppliers are responsible for conformance of parts from sub-tier suppliers when the supplier chooses the sub-tier supplier; Nordson is responsible for conformance of sub-tier supplier provided parts when Nordson designates the sub-tier supplier

### 4.0 Definitions

FMD	Full Material Disclosure, which accounts for 100% of the material in the product (including base material, additives, colorants, coatings, packaging if part of the saleable product, etc.)
Part	Any component, sub-assembly, assembly, raw material, and/or packaging component sold to or manufactured by Nordson.
RoHS	Restriction of Hazardous Substances Directive 2011/65/EU that restricts the use of specific hazardous materials, certain heavy metals, brominated substances, and phthalates, found in electrical and electronic products
RoHS Annex III and Annex IV	Annexes to RoHS which identify exemptions to the substance thresholds



Product	An item sold or provided (including promotional or other free-of-charge items) by Nordson to customers or service providers, including but not limited to standard product lines, customized ("Special") products, service/spare parts and materials. Also referred to as a saleable item or end product.
RS	Restricted Substances are those substances that are controlled within all Nordson parts, products and associated packaging.
RSL	The Nordson Restricted Substance List identifies chemical substances and threshold levels that are restricted, controlled, or declarable in Nordson products.

## 5.0 Requirements

### 5.1 Restricted Substance List

The Nordson Restricted Substance List (RSL) identifies chemical substances that are restricted, controlled and/or declarable, including the threshold level, by Nordson in order to comply with all applicable regulations and company policies. By requiring information on these substances in the material purchased, Nordson will be able to ensure that all products are compliant with local, state and national law in the countries where they are sold. The RSL may be changed by Nordson at any time based on changing regulations or other considerations. A link to the current RSL can be found in Section 7.0 References.

### 5.2 Compliance Data Management

#### 5.2.1 Substance Compliance Information

Knowing the substance content of the parts and materials used in the end product is essential for compliance determination. A Full Material Disclosure (FMD), which accounts for 100% of the material in the product (including base material, additives, colorants, coatings, etc.) is the most effective tool to determine RS compliance. The ultimate goal is to obtain FMD for all purchased material. In many cases this is attainable if the specified material grade (i.e. steel grade) is known, or if the supplier has submitted a FMD declaration. Suppliers are encouraged to provide FMD whenever possible. However, in practice FMD is not always possible due to proprietary/confidentiality issues, sub-supplier non-cooperation, or other reasons. Absent FMD, supplier polling to the RSL will be used to obtain on-going compliance information.

## 5.2.2 Declaration Verification

Nordson suppliers are expected to verify the accuracy and reliability of the compliance information through the use of appropriate evaluation, inspection, testing, and/or review of certified test reports. The process used to verify declaration data should be documented as part of the supplier's compliance system, and be available upon Nordson request.

## 5.3 Restricted Substance Use Exemptions

### 5.3.1 Use of Exemptions

Exemptions for certain, specific applications of restricted substances is allowable. All exemptions must be documented along with the justification, and approved by Nordson. Use of an exemption does not relieve the supplier from disclosure of RS. For exemptions relying on a legislative exemption having an expiration date (i.e. RoHS Annex III), the expiration date and plan to remain compliant beyond that date must also be documented.

### 5.3.2 Exemption Criteria

The criteria to grant exemptions are:

- The use appears on the RoHS Annex III or Annex IV exemption list. Note presence on this list does not automatically justify an exemption to the RSL. Nordson may still deny the request (i.e., Nordson may require use of non-leaded steels). The supplier is responsible to monitor the expiration date and remain compliant.
- Other situations approved by the Nordson

## 6.0 Training

Supplier training is available as needed from the Product Compliance Specialist. Contact [productcompliance@nordson.com](mailto:productcompliance@nordson.com) for more information.

## 7.0 References

Current RSL

[RoHS Annexes](#)

## 8.0 Document Control

Date	Change Reason	Created/Reviewed By	Approved By
8 May 2019	Document creation	Jim Pesto	<i>Barbara J. Kubala</i>