



Date: 2 January 2020

Subject: REACH and RoHS Reporting - Certification / Notification

Dear Sudesh Deep, IHS Markit

This letter is in response to your request for information concerning products supplied to you by Aptiv and its affiliates (collectively, "Aptiv"). Products are defined herein as substances, preparations, or articles according to the European Union Regulation EC 1907/2006.

Aptiv is committed to taking the necessary steps to ensure compliance with European Chemicals Regulations REACH (Regulation European Community 1907/2006) and to providing information on the restricted substances per Directive 2011/65/EU of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS). Aptiv understands its REACH obligations and has formed a global team for implementing our internal business process. These measures are designed to ensure applicable REACH compliance for substances, preparations, and articles used or manufactured in the EU and for those imported into the EU by Aptiv or its authorized representatives. We have also implemented a continuous process for gathering information concerning our wide array of products as necessary to assist our suppliers and customers in complying with their registration and notification obligations under the EU REACH regulation. In general, Aptiv is a supplier of articles, and not a supplier of substances and preparations.

Just as you rely upon Aptiv to provide information on the materials, parts, and subcomponents we supply you, Aptiv relies upon its suppliers in gathering this information. The accuracy and completeness of our information depends upon the reporting of our suppliers, and the many cascading tiers of part and material manufacturers that ultimately feed the vehicle industry at large. Aptiv is obligating its suppliers to provide complete and accurate data, and Aptiv has gathered and treated the information with due care and reasonable diligence.

To the best of our knowledge, and per the Automotive Industry Guideline, www.acea.be/reach, substances and preparations used in the articles supplied to our customers do not intentionally release and are integral to the functioning of the part, and therefore are not subject to REACH registration. We have also determined that, at this time, Aptiv does not have substances in articles falling under the conditions of Article 7(2) requiring notification. In addition, Aptiv will rely on the substances of concern data reporting process via the International Materials Data System (IMDS) and the Global Automotive Declarable Substances List (GADSL www.gadsl.org) to identify and notify you of the substances of very high concern (SVHC) contained in the articles supplied to you. There is wide automotive industry acceptance of the use of already existing Material Management Systems (e.g. IMDS, CAMDS,...) to fulfil Art. 33 obligations. There are also processes in place updating the GADSL with ECHA dossier potential SVHC substances as they apply to the automotive industry.



Aptiv will notify you of the SVHC content of our products utilizing IMDS submissions, or equivalent, with updates and resubmissions as needed. Directed buy parts will be tracked and if your assistance is required, we'll contact you. Service parts that are no longer in current production are a lower priority for tracking and replacement. We are working with the European REACH Task Force (REACH TF) and ACEA which are working with the EU Commission to obtain needed exemptions for replacement/spare parts for durable consumer goods, such as vehicles, airplanes, etc.

We are closely monitoring the addition of substances to the REACH Candidate List and Annex XIV. Analysis of our products and supplier data is on-going to assure that we continue to be in compliance with the European Chemicals Regulations REACH. Aptiv's strategy will be to pursue the replacement of substances not receiving authorization by ECHA or by customer specification in a timely manner prior to the "sunset dates." For applications/uses that do receive authorization, we will work with suppliers, and will be in contact with all customers prior to the "sunset dates". Prohibited substances will be investigated for elimination if they occur above the threshold limit and/or are used in a prohibited application.

Based upon the balance of the information provided from our suppliers to date and to the best of Aptiv's knowledge, the part numbers in Appendix A:

- are in compliance with the material restrictions of RoHS Directive 2011/65/EU, its amendments and annexes, including Directive (EU) 2015/863.
- do not contain any of the regulated SVHCs in the European Chemicals Regulations REACH (Regulation European Community 1907/2006) above the substance concentration threshold of 0.1% (w/w) in the article as supplied and are in compliance with Annex XVII of REACH and its amendments.

Please don't hesitate to contact me if you have any questions concerning this communication.

Sincerely,

A handwritten signature in black ink, appearing to read "Aldo Gomez". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Aldo Gomez,
Director, EHS, Global Operations on behalf of Aptiv and its affiliates



Appendix A

Aptiv PN	Built Description
12015323	SEAL CBL 1W M/P GRN
12034145	LOCK SECONDARY TPA MICRO BLK