Chromewell Engineering Private Limited

Product End-of-Life & ELV Compliance Policy

POLICY NO: CW-ENV-008 | VERSION: 4.0

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1. Document Information:

Document Details		Governance
Policy Owner: Head of Compliance	**Scope:** All automotive parts and components manufactured by Chromewell Engineering that are supplied to EU OEM customers or incorporated into vehicles subject to the ELV Directive. Covers material composition, restricted substance content, recyclability, and end-of-life dismantlability.	**Reviewed & Approved By:** CEO & CFO
Secondary Owner: EHS Executive & Quality Manager	**Applies To:** All product families: Pressed, welded, painted, and surface-treated automotive components. All direct and supply chain materials incorporated in products.	**Review Cycle:** Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd supplies automotive parts and components to vehicle manufacturers operating in the EU and USA market. The EU End-of-Life Vehicles Directive 2000/53/EC requires that vehicles be designed and manufactured to facilitate reuse, recycling, and recovery, and prohibits the use of specific hazardous substances - lead, mercury, cadmium, and hexavalent chromium - except where OICA exemptions apply.

This policy establishes Chromewell's commitment to full compliance with the ELV Directive, IMDS material data submission, and the broader principles of design for disassembly, recyclability, and circular material flows in automotive component manufacturing.

This policy is aligned with:

- EU End-of-Life Vehicles Directive 2000/53/EC and Directive 2011/37/EU (implementing measures)
- EU ELV Directive Annex II - restricted substances (lead, mercury, cadmium, hexavalent chromium)
- IMDS (International Material Data System) - automotive material data submission standard
- GRI 301: Materials (2016) - recycled input materials and reclaimed products
- CSRD ESRS E5 - Resource Use and Circular Economy (product circularity)
- IATF 16949 - automotive quality system requirements for environmental substance compliance

3. Scope

This policy covers:

- All automotive parts manufactured by Chromewell Engineering supplied to EU OEM customers or incorporated in EU-registered vehicles
- Material composition compliance: restricted substances, recyclable content, and material data declarations
- IMDS submissions: complete and accurate material data for all supplied parts
- Supply chain ELV compliance: all Tier 1 suppliers of materials and components incorporated in Chromewell's products
- Design for end-of-life: material selection, joining methods, and surface treatment choices that facilitate vehicle recycling

4. Key Objectives and Targets

Chromewell Engineering defines overarching environmental objectives at the management system level. Detailed objectives and targets for each sustainability issue are set in the respective sub-policy.

Waste Management Issue	Key Objectives	Target
ELV Restricted Substance Compliance	Ensure zero presence of ELV Annex II restricted substances (lead, mercury, cadmium, hexavalent chromium) in all products supplied to EU OEM customers, except where valid OICA exemptions apply and are documented.	Zero ELV non-compliant parts supplied to EU customers Annual restricted substance testing: 100% of product families by XRF and laboratory OICA exemption register: maintained and reviewed annually All product changes: substance compliance verified before customer approval
IMDS Material Data Submission	Submit complete, accurate, and current material data declarations for all automotive components in IMDS (International Material Data System),	IMDS submission: 100% of active product part numbers

	enabling vehicle manufacturers to meet their ELV reporting obligations.	IMDS data updated within 30 days of any material or process change IMDS acceptance rate from OEM customers: ≥ 98%
Recyclability and Material Selection	Select materials and joining methods that maximise the recyclability of automotive components, supporting vehicle end-of-life recycling and recovery rates required by the ELV Directive.	Recyclability assessment: completed for all new product designs before production approval Recycled material input: tracked annually (% recycled steel in raw material) Dissimilar material combinations requiring special separation: minimised in new product designs
Supply Chain ELV Compliance	Ensure all materials and components received from Tier 1 suppliers comply with ELV restricted substance requirements and are supported by IMDS material declarations.	100% of Tier 1 suppliers provide IMDS material declarations before component approval Supplier ELV compliance questionnaire: completed annually by all Tier 1 material suppliers Smallholder supplier IMDS support: training and submission assistance provided by December 2026
Product Stewardship & Customer Transparency	Proactively communicate material composition, substance compliance status, and product end-of-life guidance to OEM customers, supporting their ELV Directive compliance obligations.	Substance compliance declaration: provided to all EU customers annually OEM customer ELV questionnaires: responded to within agreed timeframe
ELV Restricted Substance Compliance	Ensure zero presence of ELV Annex II restricted substances (lead, mercury, cadmium, hexavalent chromium) in all products supplied to EU OEM customers, except where valid OICA exemptions apply and are documented.	Zero ELV non-compliant parts supplied to EU customers Annual restricted substance testing: 100% of product families by XRF and laboratory OICA exemption register: maintained and reviewed annually All product changes: substance compliance verified before customer approval

5. Governance and Allocation of Responsibilities

Clear accountability is assigned at every level of Chromewell Engineering's ESG Governance Structure. The table uses a RACI framework (Accountable, Responsible, Consulted, Informed).

Role / Designation	RACI Level	Department	Key Responsibilities Under This Policy
CEO/CFO	Accountable (A)	Executive	Final approval. Escalation authority for product recall or OEM customer dispute related to ELV compliance. Approves changes to production materials that affect substance compliance.

Head of Compliance	Primary Owner (R)	Compliance	Manages OICA exemption register, IMDS system, EU OEM customer substance compliance communications, and regulatory monitoring for ELV Directive amendments.
Quality Manager	Secondary Owner (R)	Quality	Manages restricted substance testing programme (XRF and laboratory), new product substance compliance verification, and IMDS data accuracy audits.
EHS Executive	Secondary Owner (R)	EHS / Operations	Manages process chemical substance compliance (ensuring no ELV-restricted substances are introduced in new processes), and coordinates with Legal on substance compliance for process changes.
Compliance Executive / Sustainability Manager	Secondary Owner (R)	Compliance / Sustainability	Manages GRI 301 / CSRD ESRS E5 circularity reporting, and recyclability tracking.
Purchase Manager	Consulted (C)	Procurement & Supply Chain	Ensures all new raw materials and components are ELV-compliant before purchase approval. Manages supplier IMDS declarations and ELV questionnaires. Supports smallholder supplier IMDS compliance.
Design / Engineering	Consulted (C)	Engineering	Conducts recyclability assessments for new product designs. Selects materials and joining methods consistent with ELV Directive principles. Avoids introducing restricted substances in new designs.

RACI: A = Accountable (signs off, one person only) · R = Responsible (does the work) · C = Consulted (input required) · I = Informed (kept in loop).

6. Policy Commitments

6.1 ELV Restricted Substance Testing and Control

- All product families undergo annual restricted substance testing using XRF screening followed by laboratory confirmation for detected substances
- Any new raw material or component introduced to production is substance-screened before approval
- The OICA exemption register is maintained, reviewed annually for exemption expiry, and communicated to relevant OEM customers
- No ELV Annex II restricted substance is introduced in new process chemicals, surface treatments, or manufacturing consumables without explicit EHS and Legal approval

6.2 IMDS Material Data Management

- All active product part numbers have a current, accepted IMDS material data declaration in the IMDS system
- IMDS data is reviewed and updated within 30 days of any change to raw material, supplier, surface treatment, or manufacturing process that affects material composition
- IMDS data accuracy is audited annually by the Quality Manager

- Smallholder and smaller Tier 1 suppliers who lack IMDS capability receive training and submission support from Chromewell's Quality team

6.3 Design for End-of-Life

- New product designs are assessed for recyclability before production approval, evaluating material types, joining methods, and coating systems
- Dissimilar material combinations that complicate end-of-life separation are avoided in new designs where alternatives exist
- Recycled material content in steel, aluminium, and copper inputs is tracked and reported annually to contribute to customers' circular economy metrics

6.4 Supply Chain ELV Compliance and Smallholder Support

- All Tier 1 material and component suppliers must sign a substance compliance declaration confirming ELV compliance before component approval
- Smallholder surface treatment suppliers who plate or coat Chromewell parts receive specific support to eliminate hexavalent chromium - the most prevalent ELV restricted substance in the surface treatment segment - including trivalent chrome conversion guidance and IMDS submission training.

7. KPI Monitoring and Reporting

The following KPIs are tracked by the ESG Working Group, reported quarterly to the ESG Steering Committee, and published annually in the Chromewell Sustainability Report

KPI / Indicator	Target	Measurement Method	Cadence	Owner
ELV Non-Compliant Parts Supplied	Zero	Customer audit / returns	Continuous	Head of Compliance
Product Family Substance Test Coverage	100% annually	XRF + lab test records	Annual	Quality Manager
IMDS Active Part Number Coverage	100%	IMDS system	Monthly	Head of Compliance
IMDS OEM Acceptance Rate	≥ 98%	IMDS system	Monthly	Quality Manager
Supplier IMDS Declaration Rate	100% Tier 1 before approval	Procurement records	Annual	Purchase
OICA Exemption Register Currency	Reviewed annually	Legal records	Annual	Head of Compliance
Recycled Material Input (%)	Tracked and disclosed	Material purchase records	Annual	Compliance Executive
Recyclability Assessment - New Products	100% before production approval	Design records	Per launch	Engineering

8. Policy Review Mechanism

Reviewed annually every April by Head of Compliance and Quality Manager with CEO approval. Interim review triggered by: ELV Directive amendment, OEM customer substance requirement change, OICA exemption expiry, or new product family introduction.

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	HOD Quality/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	HOD Quality/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	HOD Quality/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14,2026	HOD Quality/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

9. Compliance, Non-Conformance, and Disciplinary Action

- Supply of ELV non-compliant parts to EU OEM customers can result in product recall, customer penalties, and loss of business; the Head of Compliance is notified immediately upon any suspected non-compliance
- IMDS data inaccuracies that result in OEM compliance issues are treated as quality non-conformances and investigated using 8D methodology
- Concerns are reported through Policy CW-ETH-004 - Whistleblower Protection & Speak-Up Policy
- “Report a concern” form available on ChromeNet as an anonymous grievance redressal mechanism and, we have a dedicated hotline number published on the website to report any concern anonymously.

10. Related Documents and References

Internal policies:

- CW-ENV-001 - Environmental Management Policy
- CW-ENV-006 - Hazardous Substances, Chemicals & REACH Compliance Policy
- CW-ENV-007 - Waste Management & Circular Economy Policy
- CW-PROC-SCM-001 - Sustainable Procurement Policy
- CW-ENV-003 - Climate Transition Policy (product lifecycle emissions)

External standards:

- EU End-of-Life Vehicles Directive 2000/53/EC and Commission Decision 2011/37/EU
- IMDS International Material Data System - technical requirements and data submission guidelines
- GRI 301: Materials (2016) - recycled content and reclaimed products
- CSRD ESRS E5 - Resource Use and Circular Economy
- IATF 16949 - Customer-specific requirements for restricted substance management

11. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
Name: Mr. Vikrant Sathe **Designation:** HOD Quality **Date:** Jan 2026 **Signature:**	**Name:** Ms. Risha Naik **Designation:** CFO **Date:** Jan 2026 **Signature:**	**Name:** Mr. Amardeep Mardhekar **Designation:** CEO **Date:** Jan 2026 **Signature:**

FOR FURTHER INFORMATION:

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.