Supplier Chemical Compliance Declaration Guide

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At a glance

Who contacts you?	Assent, acting on behalf of Husqvarna Group.
Which email is used?	material.declarations@husqvarnagroup.com
Can the same part be requested again?	Yes. Different campaigns may cover different regulations or reporting needs.
Where should questions go?	Assent Supplier Support, unless the request specifically says otherwise.

> **The key point**
> A previous declaration does not automatically cover a later request. Always review the regulation, part numbers, substance-list version, scope and due date shown in the current Assent request.

1 Purpose and scope

This guide explains the chemical compliance declaration process used by Husqvarna Group and Assent. It is intended to help suppliers understand what happens after an External Drawing Review (EDR), why Assent may send several requests for the same part, how declarations should be submitted and where support is available.

Husqvarna Group's Restricted Material List (RML) is the main chemical compliance requirement for products, components, sourced products, materials and packaging supplied to Husqvarna Group. It combines applicable legal requirements with Husqvarna Group requirements and separates substances into RML Banned or Restricted substances and RML Reportable substances.

> **How the RML and Assent requests work together**
>
> Assent collects information through separate regulatory modules or campaigns, such as RoHS, REACH SVHC, PFAS, POPs, TSCA, Proposition 65, SCIP, the EU Battery Regulation or packaging requirements. A response to one module does not by itself demonstrate compliance with every requirement in the Husqvarna Group RML.

The guide supports the process but does not replace the current Husqvarna Group RML, the instructions in an individual Assent request, product specifications, contractual requirements or applicable legislation. When there is a difference, follow the most current and specific requirement.

2 What happens after the External Drawing Review

After the EDR, Husqvarna Group may start collecting product compliance information for the parts included in the design or sourcing scope. Assent is our third-party partner for supplier outreach, declaration collection and request support.

1	Assent sends a request on behalf of Husqvarna Group. Supplier communication will use material.declarations@husqvarnagroup.com.
2	The request identifies the relevant supplier parts, regulation or declaration module, required information and response deadline.
3	You review the scope and submit the requested declaration or response through the method stated in the Assent request.
4	Assent records and processes the response. If clarification or additional information is required, Assent may contact you again.

> **Prepare your email system**
>
> Please add **material.declarations@husqvarnagroup.com** to your approved-sender list. Also check shared mailboxes, spam filters and automated security quarantine if an expected request is not visible.

Keep communication connected to the request

For portal access, technical issues, regulatory guidance, declaration templates, submission questions or the status of an Assent response, contact Assent Supplier Support. Unless the request explicitly states otherwise, do not send campaign-specific declarations to a Husqvarna Group buyer, engineer or other business contact. Using Assent keeps the communication, documents, part numbers and case history together. The exception is the chemical technical file required for a sourced or finished product, which must be sent directly to the supplier's designated Husqvarna Group contact as explained in Section 7.

3 Why requests may arrive in stages

Product compliance work is normally organized by regulation, market and reporting need. A single declaration cannot always answer every requirement because different rules use different substance lists, thresholds, exemptions, product scopes and reporting formats.

Example of a staged request process

Stage	Possible request	What this means
Initial campaign	EU RoHS, REACH SVHC, PFAS	Common product and substance information is collected first.
Later campaign	POPs, California Proposition 65, TSCA	The same parts may be assessed against a different legal or market requirement.
Specific follow-up	SCIP, REACH Annex XVII, EU Battery Regulation, packaging or FMD	Additional detail may be needed because of the part use, product category, customer need or a changed substance list.

What a later request does - and does not - mean

- A later request does not necessarily mean that your earlier declaration was rejected or incomplete.
- It may be a new campaign for another regulation, a new substance-list version or a different market requirement.
- The same supplier part can therefore receive several valid requests over time.
- Each request must be reviewed and answered according to its own scope, even when you have already submitted information for that part.
- Regulatory requirements and substance lists change. Updated data may be requested when a previous declaration is no longer sufficient for the current assessment.

> **Accurate disclosure is the goal**
>
> Do not ignore a request because a substance is present or because you are unsure whether an exemption applies. Submit accurate information and supporting evidence. Presence does not automatically mean non-compliance; it may require further assessment.

4 How to respond to a request

Step 1 - Confirm the scope

- Check the customer name, regulation or module, requested part numbers and due date.
- Confirm that the listed parts are supplied by your company and identify the correct internal compliance owner.
- Read the Assent guidance linked in the request before preparing the response.

Step 2 - Use suitable evidence

You may submit your own declaration when it clearly covers the requested supplier, part numbers, regulatory scope and current product composition. When you do not have a suitable declaration, use the applicable Assent declaration template.

- Identify the legal supplier or manufacturing organization clearly.
- List every covered part number, or clearly define a product family only when all included parts have the same compliance status.
- State the regulation, substance list or declaration scope being addressed.
- Include the declaration date and the name or role of the authorized person.
- State applicable exemptions, known substance presence or requested concentration information when required by the module.
- Make sure supporting files are legible and not password protected unless Assent has agreed another method.

Step 3 - Submit through Assent

For an Assent campaign, use the portal, platform or submission route stated in the request. Do not assume that an attachment sent to another contact has been recorded. Keep the Assent confirmation or submission record for your files. For a sourced product, finished product or OEM system, also follow the separate chemical technical-file submission route in Section 7.

Step 4 - Maintain the information

Notify Assent through the relevant request or support channel if product composition, sourcing, exemptions or compliance status changes. An older declaration should not be reused when it no longer represents the supplied part.

> **No own declaration?**
>
> Use Assent's declaration templates. The templates are designed to help you provide the information in a format that can be linked to the correct regulation and supplier parts.

If the request is incorrect or does not apply to you

The request email from Assent contains a link to a web form. Use the web form if something in the request is not correct for your company. For example:

- You are not the correct contact person for these requests.
- The contact information in the request is incorrect or outdated.
- You do not recognise the part numbers listed in the request.
- The request or regulatory module is not relevant for the parts you supply to Husqvarna Group, or you believe it is out of scope.

If you prefer, or if the web form does not solve the issue, you can also get help in these ways:

- **Reply to the email.** Reply directly to the request email, and Assent Supplier Support will review your message and assist you.
- **Use the Assent Sustainability Platform (ASP).** If you have access to the platform, you can raise the issue there and try to resolve it directly in the platform. See Section 5.

Whichever route you choose, please contact support as early as possible, so that any correction can be made before the response deadline stated in the request.

5 Assent Sustainability Network

Husqvarna Group encourages suppliers to join the Assent Sustainability Network and use the Assent Sustainability Platform when available. Registration is generally optional but strongly encouraged. Certain programs or submission workflows may require registration or an active contact.

Why joining the network helps suppliers

- One central place to manage product compliance and sustainability requests.
- Previously submitted data and declarations can be reused where they remain applicable, reducing duplicate work.
- Declarations can be stored and shared proactively instead of waiting for each new customer request.
- The platform can support efficient handling of multiple parts, multiple customers and several regulatory declarations in guided workflows.
- Connections to verified Assent supplier records can provide faster access to declarations already available in the network.
- Centralized records improve traceability and help the right contact receive future requests.

Learn more: Assent Sustainability Network | Assent Sustainability Platform

6 Assent Supplier Support

Assent provides a supplier Help Center, live chat, multilingual support, training and webinars for responding to customer requests and submitting declarations. Suppliers should contact Assent when assistance is needed with a Husqvarna Group request.

Supplier Help Center	Open the Supplier Help Center
Contact Supplier Support	Open the support contact form
Phone - North America	+1 855 277-3681
Phone - Europe	+31 (20) 399 1700

> **Live chat**
> Open the Supplier Help Center and use the live-chat function. Assent can assist with portal access, technical issues, request interpretation, regulatory guidance and declaration submission.

7 Sourced products, OEM products and batteries

Additional documentation is required when a supplier delivers a sourced product. This applies to a complete finished product and to a system or major assembly that will be included in a finished product. The supplier must provide enough product-level information for Husqvarna Group to fulfil all applicable legal and reporting obligations.

Direct chemical technical-file submission to Husqvarna Group

For a sourced product, finished product or OEM system, the supplier must send the chemical technical file directly to its designated Husqvarna Group contact. This may be the responsible buyer, sourcing contact, project contact or another person identified by Husqvarna Group.

Important exception to the Assent communication route

Campaign-specific declarations and questions must continue to be handled through Assent. The product-level chemical technical file for a sourced or finished product must be sent directly to the designated Husqvarna Group contact. The two submission routes are separate, and neither one replaces the other.

What the chemical technical file must show

The chemical technical file should be structured according to EN IEC 63000:2018 and must show how the product is built and how chemical compliance has been assessed. A Full Material Declaration (FMD) in IPC 1752A Class D format is Husqvarna Group's preferred material-data format when available.

When the supplier owns the bill of material (BOM)

For a sourced product where the supplier owns the bill of material (BOM), the supplier must submit an Assent declaration at the top level of the product, in addition to the chemical technical file structured according to EN IEC 63000:2018 sent directly to the designated Husqvarna Group contact. Both submissions are required, and neither one replaces the other.

Required area	Expected information
Product structure / BOM	A structured, multi-level bill of material showing the relationship between the finished product, assemblies and individual articles. This traceability is essential for SCIP and other reporting obligations.
Article identification	Article number, article description and the supplier for each article.
Classification	TARIC number or material category, where applicable.
RML status	Confirmation that every article meets the current Husqvarna RML Banned or Restricted substance requirements, including the RML year/version used.
Reportable substances	Information required by the current RML. For an SVHC above 0.1% (w/w) in an article, provide the substance name, CAS number and the year/version of the REACH Candidate List. Other RML topics may include PFAS, flame retardants, critical raw materials, precious metals, hazardous substances, TSCA substances and Registry of Intentions substances.
EU RoHS	Status as compliant or compliant with exemptions. Every exemption used must be identified and reported.
Sub-supplier risk	A risk assessment of sub-suppliers, a clear risk conclusion and any actions taken to reduce the risk of non-compliance.
Chemical testing	When a risk of non-compliance has been identified, testing must validate the relevant article. Testing must be performed by an ISO/IEC 17025 accredited laboratory.

Special requirements for sourced batteries

When the sourced product is a battery, battery module or battery pack, the chemical technical file and the Assent response must cover the battery-specific scope stated in the request. All parts of the battery are in scope, including items such as cells, screws, housing and the battery-management system (BMS).

Hazardous substances under Article 74

For substances classified as hazardous under Article 3 of Regulation (EC) No 1272/2008 (CLP) and present at or above 0.1% (w/w), provide the following information:

- Substance name.
- CAS number.
- Substance concentration.
- Harmonized substance classification under the CLP Regulation.
- Location of the hazardous substance in the battery.

When the supplied item is not itself a battery

A targeted EU Battery Regulation request may still be sent when a part is intended for, or may be incorporated into, a battery or battery pack. For example, Husqvarna Group may request information supporting an assessment of Article 6 and Annex I restrictions for mercury, cadmium and lead. The request supports the assessment of the final battery or battery pack; it does not automatically mean that the supplied component is classified as a battery.

> ### How to answer a battery-related request
>
> Respond for the supplier part listed in the request and follow the exact Assent module. Do not mark the request as not applicable only because the part is not a complete battery. For a sourced battery or battery pack, also provide the product-level chemical technical file directly to the designated Husqvarna Group contact.

Keep the chemical technical file current

The chemical technical file must represent the product actually supplied. Update it when the product design, bill of material, sub-supplier, material composition, RML version, RoHS exemption or other compliance status changes. Husqvarna Group may request additional evidence or ISO/IEC 17025 test reports when the available documentation is not sufficient or when a compliance risk has been identified.

8 Supplier checklist

- ☐ Allow material.declarations@husqvarnagroup.com through email and security filters.
- ☐ Assign an internal owner for product compliance requests.
- ☐ Check the requested part numbers, regulation, scope, substance-list version and deadline.
- ☐ Submit each campaign response through the Assent route stated in the request.
- ☐ Use an Assent template when you do not have an appropriate declaration.
- ☐ Respond to each new campaign, even when the same part was declared previously.
- ☐ Use Assent Supplier Support for portal, technical, regulatory and submission questions.
- ☐ Join the Assent Sustainability Network where possible to reduce duplicate work and support efficient multi-part responses.
- ☐ For a sourced product, finished product or OEM system, send the chemical technical file directly to your designated Husqvarna Group contact.
- ☐ Make sure the chemical technical file includes a traceable multi-level BOM, article and supplier identification, RML status, RoHS status, reportable-substance information, sub-supplier risk conclusions and required test evidence.
- ☐ For a sourced battery, include the required hazardous-substance information for all battery parts.
- ☐ Update all information when product composition, sourcing, exemptions or compliance status changes.

> **Two routes to remember**
>
> Assent campaign response: submit through Assent. Sourced or finished product chemical technical file: send directly to the designated Husqvarna Group contact.

9 Regulatory guidance and declaration resources

This section brings the main Husqvarna Group and Assent resources together in one place. Always use the current campaign instructions and the latest RML edition, because substance lists, legal scopes and reporting requirements may change.

Husqvarna Group RML and chemical technical-file guidance

Husqvarna Group RML Requirements 2026	The main chemical compliance requirement for all suppliers, including Banned or Restricted substances, Reportable substances, acceptable documentation, SCIP and additional product requirements.
RML Substance Lists - version 17.0 (2026)	The current reference list for RML Banned or Restricted substances and RML Reportable substances. It supports topics such as SVHC, PFAS, flame retardants, critical raw materials, precious metals, hazardous substances, TSCA substances and substances under regulatory review.
Best Practices for Material Compliance	Practical guidance on Full Material Declarations, risk-based testing, sourced/OEM products and the example chemical technical file in Appendix I.
IPC-1752A Class D Full Material Disclosure	Assent instructions for submitting a complete material disclosure in Husqvarna Group's preferred material-data format.
Declaration Templates	Assent templates for suppliers that do not have their own suitable declaration.

9 Regulatory guidance and declaration resources - continued

EU chemical and product-compliance requests

REACH SVHC Request	Candidate List substances of very high concern, including article-level information needed for communication and reporting.
REACH Annex XVII Request	Substances and uses restricted under Annex XVII of the REACH Regulation.
EU RoHS Request	Restricted substances in electrical and electronic equipment, including reporting of applicable exemptions.
Persistent Organic Pollutants (POPs)	Declarations relating to substances restricted under the EU POPs Regulation.
About PFAS	Background and guidance for requests concerning per- and polyfluoroalkyl substances.
Waste Framework Directive / SCIP	Information needed for articles containing Candidate List SVHCs above 0.1% (w/w), including article and complex-object reporting data.

9 Regulatory guidance and declaration resources - continued

Battery, US and packaging requests

EU Battery Regulation Request	Battery-specific information and substance data requested under Regulation (EU) 2023/1542, including requirements that may apply to battery components.
California Proposition 65 Request	Information used to assess listed chemicals and potential California warning obligations.
TSCA Under Evaluation Request	Information concerning substances under evaluation or regulatory review under the US Toxic Substances Control Act.
Toxics in Packaging	Guidance concerning restricted substances and declarations for packaging materials, including US model packaging requirements.
EU Packaging and Packaging Waste Regulation (PPWR)	Official EU information on Regulation (EU) 2025/40, including the transition from the previous Packaging and Packaging Waste Directive.

Final reminder

For an Assent request, respond through Assent by the deadline shown in the campaign. For a sourced or finished product chemical technical file, send the complete documentation directly to the designated Husqvarna Group contact. For help with an Assent request, use the Supplier Help Center, live chat, support form or telephone numbers in Section 6.

Process notice

This document is a process guide. It does not provide legal advice and does not replace applicable legislation, contractual requirements, the current Husqvarna Group RML, product specifications, the current Assent request or the instructions in an Assent module.