

Procurement Compliance Program Overview



Headquartered in the US and operating in all regions of the world, Vertiv and its customers are subject to many laws and regulations requiring supply chain and product content due diligence. Vertiv also has a strong commitment to environmental, social, and governance principles. As a condition of doing business, Vertiv expects all suppliers to demonstrate compliance with RoHS; REACH; EU Waste Framework Directive; Conflict Minerals regulations; Anti-Human Trafficking; entity-specific trade sanctions; and similar regulations.

Vertiv has partnered with **Assent Compliance** to gather critical supply chain data, including product full materials disclosures, certificates of part and product compliance, conflict minerals disclosures, human trafficking disclosures, code of conduct

acknowledgments, and similar information. Assent Compliance is authorized by Vertiv to collect this important information and will contact suppliers first by email, with follow-up by phone if required; a Letter of Authorization can be found on Vertiv.com. Vertiv and Assent make every effort to provide ample time to submit the requested documentation, and suppliers are expected to respond via Assent's Supplier Portal within the provided deadlines. Vertiv may discontinue its relationship with any supplier that fails to respond to regulatory requests.

IMPORTANT: Please request that your IT department "whitelist" both vertiv.com and assentcompliance.com email domains in your company's spam-blocking application so that you receive compliance requests in a timely fashion.

Vertiv's 2020-2021 Global Procurement Compliance Calendar

Part-level Material Compliance Program											
Jul 2020	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
EU REACH List Update	Suppliers submit semi-annual REACH, RoHS, and Reportable Substances disclosures					EU REACH List Update	Suppliers submit semi-annual REACH, RoHS, and Reportable Substances disclosures				
		Suppliers submit supplemental data for EU SCIP				ECHA SCIP Deadline		Suppliers submit supplemental data for EU SCIP			
Ad hoc requests for RoHS, REACH, and SCIP data to support new product development and introduction											
Company-level Corporate Social Responsibility											
Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
		Suppliers submit annual Conflict Minerals CMRT								SEC Deadline	
		Suppliers submit anti-human trafficking STRT and acknowledge Supplier Code of Conduct (2020 campaign)							Suppliers submit STRT and acknowledge Code of Conduct (2021 campaign)		
								Suppliers submit annual Cobalt CRT			

Conflict Minerals

To demonstrate compliance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Vertiv collects data with the [Conflict Minerals Reporting Template \(CMRT\)](#). The US law requires in-scope companies to identify the sources of any gold, tin, tantalum, and tungsten (3TGs) present within their products and submit a report to the US Securities and Exchange Commission (SEC). Section 1502 of the Dodd-Frank Act applies to US publicly traded companies, like Vertiv. Recently, cobalt has become a focus area due to child labor and safety concerns, and Vertiv has begun tracing sources of cobalt in its supply chain using the [Cobalt Reporting Template \(CRT\)](#). Because regulatory customer requirements trickle down through the supply chain, private companies and companies located outside the US that do business with Vertiv, are also required to collect and provide data. Vertiv's goal is for all 3TG and cobalt smelters in its supply chain to conform with the [Responsible Minerals Assurance Process \(RMAP\)](#).

Anti-Human Trafficking And Supplier Code Of Conduct

Modern slavery is an urgent human rights issue that is estimated to affect over forty million people globally. Several governments have instituted due diligence requirements to improve transparency to labor practices in supply chains. To demonstrate compliance with Section 54 of the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act of 2010, the Australian Modern Slavery Act 2018, and the New South Wales Modern Slavery Act 2018, Vertiv collects data with the [Slavery and Trafficking Risk Template \(STRT\)](#) and requests suppliers to acknowledge its Supplier [Code of Conduct](#).

The REACH Regulation

Article 33 of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation requires companies producing and / or importing products into the EU to provide the recipients and consumers of the products information about Substances of Very High Concern (SVHC) present in products. Vertiv requests full material disclosures (FMDs) or REACH declarations that state whether or not parts/products contain any REACH SVHC substances for the parts and products Vertiv purchases.

EU REACH Waste Framework Directive

The [EU Waste Framework Directive](#) (2018/851) mandates that as of January 2021, any product imported in the EU that contain REACH SVHCs above 0.1% concentration must be registered in the ECHA SCIP (Substances of Concern In Products) database. Vertiv will ask suppliers to provide safe use instructions and other data to support SCIP filings.

The RoHS Directive

The Restriction of Hazardous Substances (RoHS) Directive restricts the use of 10 hazardous substances in electrical and electronic equipment to protect human health and the environment. Vertiv requests Full Material Disclosure or RoHS declarations that state whether or not parts/products contain any of the 10 restricted substances over 0.1 percent weight by weight

(w/w). There are temporary exemptions available for certain parts/products. Even if your parts/products are not electrical or electronic, Vertiv may still request a RoHS declaration if it is determined they are incorporating your parts/products in a final product that is electrical or electronic, as the entire product has to be RoHS compliant.

Full Materials Disclosure And Reportable Substances

To reduce the frequency of data gathering from suppliers, Vertiv encourages suppliers to submit Full Material Disclosures (FMDs) to Assent, listing all or most of the content in a product in a standard XML format. Suppliers can use the [Assent Materials Declaration Tool](#) for free to complete an FMD XML. Providing FMDs allows Vertiv to analyze the impact of restricted or reportable substances on all material related regulation lists and meet regulations' obligations to eliminate or report hazardous substances, without gathering further data from suppliers when new substances have been added to the lists.

Regional Regulations

Suppliers may be required to submit company or product disclosures supporting other regulatory requirements that exist in the countries where Vertiv operates, beyond the programs outlined in this document. Suppliers are expected to respond to these inquiries within the timelines requested.

Supplier Support

Assent provides multilingual support to suppliers who need assistance in using the Assent Supplier Portal. The Supplier Help Center contains regulatory information and articles on submitting a declaration. Suppliers can contact Assent using one of the phone numbers indicated here or by email at: compliancesupport@assentcompliance.com.

Assent Compliance Phone Support:

English 1 877 902 3150

Français 1 855 724 6196

Español 1 855 724 1775

Português 1 855 724 4759

Italiano 1 855 724 6215

日本語 1 855 724 7015

中文 热线 1 855 724 5211

Polish 1 855 724 5210

Deutsch 1 855 724 7044

