

ESG, QC and Compliance instructions

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Dear Supplier

This guide provides you with an overview of the ESG, QC and compliance requirements that apply to you as a supplier to F&H Group A/S (F&H). The requirements are established to ensure a high level of safety and quality, while also creating opportunities for improvement and transparency in our sustainability efforts, both regarding environmental impacts in general and specifically with respect to climate impact.

The regulations and requirements outlined in this guide are not exhaustive. Depending on the specific product, additional requirements may apply. These will be communicated by your designated contact at F&H.

This guide contains many important details about being a supplier to F&H so please read it carefully. If you have any questions about this guide, please reach out to your contact person at F&H.

Chinette Bonde Ebbesen

Head of ESG, QC and Compliance

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GENERAL REQUIREMENTS

Documentation

At F&H, we maintain high standards for reliability and traceability. To ensure our products meet these standards, we require comprehensive documentation. If there is an applicable standard for a given product, F&H expects the product to comply with these requirements.

As a company, F&H has experienced a significant rise in the demand for documentation and data in recent years. The growing demand for transparency means that we need to collaborate closely with our suppliers to obtain the necessary and relevant documentation and data. As a supplier to F&H, it is essential that you are prepared and willing to share the documentation needed for us to meet these demands.

In cases where a supplier does not have the requested documentation or data, it is our expectation that the supplier will actively work to obtain the necessary information in a satisfactory manner. The documentation request may pertain to various elements, including relevant production information, delivery methods, packaging, material, waste management, resource utilization, energy consumption, labor conditions, and more.

Required documentation could be:

- Certificates
- Data sheets
- Test reports (performed by accredited laboratories)
- Declaration of Conformity
- BOM (Bill of Materials)

General Product Safety (GPSR)

All European suppliers are required to make a safety assessment for each product in compliance with *regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety* (as amended). This assessment must ensure that all products supplied meet the safety requirements set forth by the regulation.

The safety assessment must include the following:

- Identification and analysis of potential risks associated with the product.
- Evidence of compliance with relevant safety standards.
- Documentation of any safety tests conducted, and certifications obtained.
- Measures taken to mitigate identified risks and ensure consumer safety.

We are making the assessment based on the documentation received from the suppliers. It must be made before products are made available.

REACH

All products must comply with the following chemical safety standards in accordance with *REACH Regulation (EC) No 1907/2006* (as amended), and restrictions on Substances of Very High Concern (SVHCs):

1. REACH Compliance:

- Suppliers must ensure that no restricted substances are present above the allowable limits and that all substances in the product are registered and evaluated per REACH requirements.
- Products must not contain substances listed in Annex XVII of REACH, which restricts the use of specific hazardous substances, such as certain phthalates, heavy metals (lead, cadmium, mercury), and other hazardous chemicals.
- REACH compliance declaration must be provided. Test documentation with specifications and test results may be required.

2. SVHC Limits:

- Products must not contain SVHCs (as listed by the European Chemicals Agency (ECHA) on the actual Candidate List) in concentrations above 0.1% (w/w).
- If any product contains a SVHC listed on the latest updated version of the ECHA Candidate List in concentrations exceeding 0.1% (w/w), the supplier is obligated to inform us prior to the purchase. This notification must include the following:
 - The identity of the SVHC and its concentration.
 - Detailed safety information, including risks related to human health and the environment.
 - Specific guidelines for safe use, handling, storage, and disposal.
 - Confirmation of compliance with Article 33 of the REACH Regulation.

This information must be provided in advance of any purchase decision, allowing us to assess the potential risks and ensure compliance with all legal obligations before acquiring the product. Failure to provide this information will result in non-acceptance of the product.

Persistent Organic Pollutants

Suppliers must comply with *Regulation (EU) 2019/1021* (as amended), on Persistent Organic Pollutants and ensure that no substances listed in this regulation are present in their products or used in production processes.

Biocidal Products

Suppliers must confirm that no biocides or biocidal products regulated under the *EU Biocidal Products Regulation (BPR) No. 528/2012* (as amended), are used in the production, processing, packaging, or delivery of the goods.

Classification, Labelling and Packaging of Substances and Mixtures

Products regarded as a chemical substance or mixture must be labelled according to *regulation EC no. 2008/1272 on Classification, Labelling and Packaging of Substances and Mixtures* (CLP) (as amended).

CLP applies to all products where the content is of greater importance for the function of the product than the form/design of the product. The object is to ensure that consumers are informed of necessary precautions and/or actions in case of accidents.

Examples of products regarded as chemical mixtures:

- Scented candles
- Fragrance diffusers
- Oil lamps fuels
- Cosmetics and personal care products (e.g., hand wash, lotions)

Labelling in accordance with CLP must appear in legible, visible and indelible characters on the packaging in which the product is made available to the consumers.

Claims for Product Features

The supplier is responsible for ensuring that all claims and statements can be substantiated and that they comply with EU and Danish legislation (or other relevant national legislation, as applicable).

Examples of claims that need to be documented include:

- Safety claims: Non-toxic, Fire-resistant, BPA-free, Phthalates free, produced without PFAS, Produced with Lead and Cadmium free glaze, etc.
- Sustainable claims: recycled material, recyclable material, lower emission, etc.
- Performance claims: Efficiency, strength, waterproof, windproof, etc.
- Certification claims: OEKO-TEX, GRS, FSC, Swan, etc.

The documentation must be:

- Valid
- Compliant
- Non-misleading
- Supported by evidence

The supplier must be able to provide the necessary documentation to prove that these claims are truthful and legally compliant. Without valid documentation, the suppliers are not allowed to use the claims for the product.

FOOD CONTACT MATERIAL (FCM)

All FCMs must be in compliance with *regulation 1935/2004/EC* (as amended) and the Danish Regulation *BEK nr 681 of 25/05/2020* and have been manufactured according to *regulation 2023/2006/EC* (as amended).

All FCMs must be accompanied by a declaration of compliance (as required by Danish law), confirming that the FCMs meet the applicable regulations, or, if no specific regulation exists, explaining how their safety has been demonstrated.

F&H do not accept food contact products produced from recycled plastic, unless others are requested specifically. If recycled material is used at F&H's request, it must comply with *regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods* (as amended).

FCM must not transfer substances that alter the taste or smell of the food, in accordance with *regulation (EC) No 1935/2004* (as amended).

Bisphenol A (BPA) is prohibited in the following materials: adhesives, rubbers, ion-exchange resins, plastics, printing inks, silicones, and varnishes and coatings, in accordance with COMMISSION REGULATION (EU) 2024/3190 on the use of bisphenol A and other bisphenols (as amended). The regulation also requires that the presence of other bisphenols in the product be disclosed, ensuring transparency and safety in food contact materials.

In addition, individual materials used to manufacture articles in contact with food must meet the following requirements:

1. Plastics:

- Regulation 10/2011/EU (as amended): For all plastic materials.
- Regulation 284/2011/EU (as amended): For polyamide and melamine. Covers polyamide and melamine resin originating in or consigned from the People's Republic of China and Hong Kong Special Administrative Region, China only.
- Regulation (EC) No 1895/2005 (as amended): For materials containing epoxy derivatives.
- All plastic materials must be followed by Declaration of Compliance issued by material manufacturer.

2. Ceramics, glass and enamel:

- All ceramic products must comply with *directive 84/500/EEC* (as amended).
- The EU regulation outlined above is not enough to cover the substances in these materials. Therefore, other regulations must be complied with as well.
 - Norwegian regulation: FOR-1993-12-21-1381 (matforskriften) is used for mouthrim and lead, cadmium and barium.

- French regulation: Fiche spécifique DGCCRF "Verre - cristal - céramique - Vitrocéramique - objets émaillés" du 01/05/2016 is used for aluminum, cobalt and arsenic.
- Austrian regulation: Gesamte Rechtsvorschrift für Keramik-Verordnung, Fassung vom 08.10.2022 for zinc and antimony.
- Each color and type of glaze must be tested separately, as there may be different substances in the different colours.
- Additionally, it must be tested as outlined in Appendix I. The result must fall within the acceptable limits of the relevant standards in Appendix I.

3. Stainless steel:

- Stainless steel must comply with EN 10088, which sets the chemical composition and mechanical properties for stainless steel grades suitable for food contact.
- Additionally, *Council of Europe's Resolution CM/Res(2020)9* provides specific guidelines for the composition of metals and alloys used in food contact materials.

4. Wood – untreated:

- Must be free from harmful heavy metals like lead, cadmium, and mercury.
- Formaldehyde: Must be below safe limits.
- Preservatives and Pesticides: Should be absent or within strict limits.
- Sensory Testing: Ensures no negative impact on food's taste or smell.

5. Wood – with surface treatment:

- Must comply with the requirements for untreated wood, and additionally, coatings, finishes and adhesives must be food-safe and non-toxic. To ensure this, appropriate documentation and test is required depending on the characteristics of the treatment.

6. Active and intelligent FCMs: Regulation 450/2009/EC (as amended)

7. Regenerated cellulose: Directive 2007/42/EC (as amended)

FCM not subject to specific measures must be shown to be in accordance with article 3 of *regulation 1935/2004/EC* (as amended) in other ways. Compliance with for instance the BfR recommendations on FCM and Resolutions (or a combination of the two) can be a possible way of demonstrating the safety of the FCM.

According to Danish legislation FCM targeted for children of the age 0-3 years are not allowed to contain any phthalates in concentrations above 0.05 % of weight or any bisphenol A. Specific types of materials can be subject to more severe restrictions regarding phthalates than max. 0.05 %.

F&H does not accept fumigation of FCMs or fumigation of containers containing FCM.

CE-MARKED PRODUCTS

For products requiring CE-marking, suppliers must provide below where relevant.

Technical Documentation:

- Product design and manufacturing details: Specifications and production information.
- Risk assessments and test reports: Evidence of compliance with relevant and updated EU standards and directives.
- Certificates from notified bodies: If applicable, certifications proving conformity from recognized bodies.

EU Declaration of Conformity:

- A signed EU Declaration of Conformity stating that the product meets all relevant EU requirements and directives.

CE-marking:

- Verification that the CE-mark is correctly affixed to the product and/or packaging and includes any additional required symbols or information.

User manuals and safety information:

- Complete and accurate user manuals, including safety instructions and any relevant warnings.

Compliance with specific directives:

- Confirmation that the product meets the requirements of specific directives relevant to its category (e.g., Low Voltage Directive, Machinery Directive).

Product information:

- The product must bear product identifiers to maintain traceability with product for quality control and recall purposes.

ELECTRICAL AND ELECTRONIC EQUIPMENT (EEE)

Must follow the points laid out in the chapter “CE-marked products” above. Furthermore, there are the following requirements.

1. Directives and Regulations:

- Low Voltage Directive (LVD) 2014/35/EU, as amended: Ensures that electrical equipment operates safely within certain voltage limits.

- Electromagnetic Compatibility (EMC) Directive 2014/30/EU (as amended): Ensures that equipment does not emit electromagnetic interference and can tolerate a certain level of interference from other devices.
- Directive 2014/53/EU (RED) (as amended): For Radio equipment
- EU Ecodesign Directive (EU) 2023/826 (as amended): Ecodesign requirements for off mode, standby mode, and networked standby energy consumption of electrical and electronic household and office equipment.
- EU Energy labelling regulation (EU) 2017/1369 (as amended): EPREL registrations cannot be completed without complete technical documentation.
- RoHS Directive 2011/65/EU (as amended): Restricts the use of certain hazardous substances (e.g., lead, mercury, cadmium) in electrical and electronic equipment.
- WEEE Directive 2012/19/EU (as amended): Addresses the disposal and recycling of waste electrical and electronic equipment.

Rechargeable Battery:

- Directive (EU) 2023/1542 (as amended): heavy metal contents pb, cd, hg should be below the limitation
- EN 62133 series safety test reports: Secondary cells and batteries containing alkaline or other non-acid electrolytes – Safety requirements for portable sealed secondary cells, and for batteries made from them, for use in portable applications

All batteries:

- Directive (EU) 2023/1542 (as amended).
- CE and WEEE should be marked on battery.
- Products must be designed so that batteries/accumulators can easily be removed and replaced by the end user.
- It must include instructions on how batteries/accumulators can be safely removed and replaced by the end user.

2. Compliance with specific standards:

- Adhere to specific harmonized standards related to electrical and electronic equipment to ensure comprehensive compliance with EU regulations.

TOYS

Must follow the point laid out in the chapter “CE-marked products” above. Furthermore, there are the following requirements.

F&H do not accept fumigation of toys or fumigation of containers containing toys.

For toys, suppliers must ensure:

1. Correct labelling:

- Ensure the toy bears the CE-mark, indicating conformity with EU safety standards.
- Include age warnings and safety information based on the toy's intended age group (e.g., “Not suitable for children under 3 years”).

2. Directives and regulations:

- Toy Safety Directive 2009/48/EC (as amended): Ensures that toys meet safety requirements related to physical and mechanical properties, flammability, chemical properties, and hygiene.
- BEK nr 815 af 07/06/2022 (as amended): Danish regulation on toys.
- BEK nr 1116 af 12/12/2003 (as amended): Danish regulation on safety requirements for toys and products which, due to their external appearance, can be mistaken for foodstuffs.
- BEK nr 947 af 20/06/2020 (as amended): Danish regulation on the ban on phthalates in toys and children's articles. According to Danish legislation toys targeted for children of the age 0-3 years are not allowed to contain any phthalates in concentrations above 0.05 % of weight.

3. Compliance with specific standards:

- EN71 - Safety of toys: Parts 1-3 are mandatory for all toys (Parts 4-14 when relevant).
- EN 62115: Electric toys safety.

WOOD-CONTAINING PRODUCTS (EUDR)

European Deforestation Regulation (EUDR) is aimed at combating global deforestation and forest degradation. It requires companies to ensure their products do not contribute to deforestation, emphasizing traceability and transparency across the full value chain.

To meet these requirements, we need documentation covering the entire value chain (from the forest to the trader). This includes, but is not limited to:

- FSC certificate
- Business license
- Harvesting license
- Contract
- Invoice
- Delivery note
- etc.

Furthermore, we need geolocation data for the forests where the wood used in the products is harvested. Geolocation must include the following:

- Plots at four hectares or smaller: The geographical location of the plot of land using latitude and longitude coordinates (at least six decimal).
- Plots larger than four hectares: A polygon with sufficient latitude and longitude points to outline the perimeter must be provided.

The tool for mapping and obtaining coordinates must be www.Geojson.io.

The EUDR will officially come into force on December 30th, 2025. From this date, any products that do not meet the requirements will not be able to import into EU. Compliance with the regulation will be mandatory to ensure that products can legally enter the EU market. Failure to comply could result in products being blocked or subject to penalties.

TEXTILES

To ensure compliance with relevant standards and regulations, all textile products sold to F&H must meet the requirements. Suppliers are always expected to comply with applicable laws and regulations, and to provide documentation to proof it. Accurate fiber labelling must follow *regulation No 1007/2011* (as amended). Furthermore, suppliers must adhere to the agreed-upon quality standards set by F&H's buying department at all times.

PACKAGING MATERIALS

Danish legislation on packaging is closely aligned with EU regulations aimed at reducing the environmental impact of packaging and packaging waste. The *directive on Packaging and Packaging Waste (94/62/EC)* (as amended) has been implemented into Danish law and regulates the design, production, and management of packaging to minimize waste and promote recycling. Furthermore, the *regulation (EU) 2025/40 on Packaging and Packaging Waste Regulation* (as amended) must also be complied with.

The aim of the following packaging recommendations, both for transport and sales packaging, is to reduce, reuse, and recycle to the greatest extent possible, provided that safety, quality, and handling of the packaging are not compromised.

As a supplier to F&H, it is a requirement to share data regarding packaging specifications and you can expect that the requirements for packaging will develop in line with increasing legislative requirements, restrictions and imposed taxes.

Requirements regarding plastic packaging

- Use mono material or material in compatible polymer structures.
- PVC may not be used in packaging.
- The total combined concentration of the following heavy metals in packaging or packaging components must *not* exceed **100 mg/kg** (parts per million):
 - Lead (Pb)
 - Cadmium (Cd) must not exceed 75 ppm.
 - Mercury (Hg) must not exceed 0,5 ppm
 - Hexavalent Chromium (Cr(VI))

General packaging recommendations

- Reduce the use of foam to protect products in favour of paper alternatives where appropriate.
- Reuse delivery boxes as cushioning transport packaging material when possible.

- Remove and reduce packaging material as much as possible without compromising the product protection.
- Use packaging where all components can be easily separated to optimize recyclability.
- To optimize transportation efficiency, packages should be packed as tightly and compactly as possible.

Recommendations regarding plastic packaging

- Reduce the use of biodegradable and oxo-degradable plastic (EPS).
- Avoid colouring virgin plastic feedstock.
- Preferably plastic packaging shall be made from either polyethylene (PE), polypropylene (PP) or polyethylene terephthalate (PET).

MONITORING AND REPORTING

Commitment to informing of changes

The supplier must inform F&H of any changes in production processes or raw materials that could affect the products (including packaging) supplied to F&H. This includes changes that may impact the product's compliance with safety standards, quality, or regulatory requirements.

Commitment to reporting errors

The supplier must inform F&H immediately if any errors or mistakes are discovered in the production processes or raw materials that affect the products (including packaging) supplied to F&H. This includes notifying us of any issues that could impact the product's safety, quality, or compliance with regulatory standards.

Appendix I

	Lead [Pb]	Cadmium [Cd]	Cobalt [Co]	Zinc [Zn]	Barium [Ba]	Antimony [Sb]	Aluminum [Al]	Arsenic [As]
Category 1	0.8 mg/dm ² (EU) 0.02 mg/dm ² (N)	0.07 mg/dm ² (EU) 0.002 mg/dm ² (N)	0.02 mg/kg (F)* 3 testruns	3 mg/article (A)*	1 mg/article (A)* 0.2 mg/dm ² (N) + mouth rim	1 mg/article (A)*	1 mg/kg (F)	0.002 mg/kg (F)
Category 2	4.0 mg/l (EU) 0.1 mg/l (N)	0.3 mg/l (EU) 0.01 mg/l (N)	0.02 mg/kg (F) 3 testruns	3 mg/article* (A)	1 mg/article* (A) 1 mg/l (N)	1 mg/article* (A)	1 mg/kg (F)	0.002 mg/kg (F)
Category 3	1.5 mg/l (EU) 0.1 mg/l (N)	0.1 mg/l (EU) 0.01 mg/l (N)	0.02 mg/kg (F) 3 testruns	3 mg/article* (A)	1 mg/article* (A) 1 mg/l (N)	1 mg/article* (A)	1 mg/kg (F)	0.002 mg/kg (F)
Mouth rim	0.8 mg/dm ² (DK)	0.07 mg/dm ² (DK)			0.2 mg/dm ² (N) Category 1 + mouth rim			
	2 mg/article (F)	0.2 mg/article (F)						
	0.02 mg/dm ² (N)	0.002 mg/dm ² (N)						

EU: Directive 84/500/EC with amendments	COUNCIL DIRECTIVE no. 500 of 15 October 1984
A: The Austrian regulation	Gesamte Rechtsvorschrift für Keramik-Verordnung, Fassung vom 08.10.2022
F: The French regulation	Fiche spécifique DGCCRF "Verre - cristal - céramique - Vitrocéramique - objets émaillés" du 01/05/2016
DK: The Danish regulation	BEK. nr. 681 af 25/05/2020 (will be updated in January 2026)
N: The Norwegian regulation	FOR-1993-12-21-1381 (matforskriften)