Molex, LLC.
Product Stewardship

Declaration of Non-Use (DoNU) – Frequently Asked Questions

1.0 Introduction

Molex recognizes that our business operations have an effect on the global environment. Therefore, as a responsible corporate citizen, Molex is committed to applying environmentally conscious practices to our business activities, products and services. One aspect of our approach to protecting the environment is to ensure our products comply with legal and other requirements.

In order to demonstrate product compliance, Molex requires suppliers to provide product-related environmental information using the Declaration of Non-Use (DoNU).

2.0 Definitions

(See MCSS Section 6.0 for full list)

DoNU	Declaration of Non-Use
MCSS	Molex Chemical Substances Specification for Products and Packaging
Banned Substances	Prohibited substances where the maximum concentration value is 0 weight percent or 0 ppm. No detectable level of a banned substance is permitted in a homogeneous material, whether intentionally added or as an impurity.
Declarable Substances	For substances that are not currently prohibited substances, there may still be a legal, industry, or customer requirement to report the weight percent or PPM level when it is above a threshold. These substances are classified as declarable substances and are either included in legal requirements (for example, the REACH legislation), or may be included in future restrictions as prohibited substances. Declarable substances shall be reported to Molex when present above thresholds found in this specification.
CAS Number Tool	The MCSS is linked to a list of prohibited and declarable substances compiled from various government regulations and customer requirements. The MCSS CAS Number Tool is designed to ensure that the substances contained in Molex products are in compliance with the MCSS.
Intentionally Added Substances	Substances that are deliberately used in the formulation or fabrication of a product, sub-assembly, component, or material to provide specific characteristics, appearance, or quality. Intentionally added substances may be prohibited substances, declarable substances, or substances that are neither prohibited nor declarable. Intentionally added substances may also be referred to as the ingredients of the product.

	These are the substances that shall be included in the Full Material Declaration.
Impurities and Trace Substances	Substances in a material that are not intentionally added. They may exist in natural materials or as substances generated in the process of producing a material. These substances shall not be included in the Full Material Declaration but shall be addressed in the DoNU.
Maximum Concentration Value	For prohibited substances, the upper limit on the amount of the substance that can be included in the homogeneous material is called the maximum concentration value or MCV. The MCV can be expressed in terms of weight percent or PPM. Maximum concentration values for prohibited substances apply regardless of whether the prohibited substance is intentionally added or an impurity/trace substance and the MCV shall apply to the amount of the substance contained in each homogeneous material.
Homogeneous Material	Materials that are of uniform composition throughout and that cannot be mechanically disjointed into different materials. Homogeneous materials are raw materials used to fabricate a product, or materials that are applied to a raw material or a product during fabrication. For example, in terminals plated with both a nickel and a Tin layer, the base metal (copper alloy) and each plating layer is considered a homogeneous material and therefore shall be considered separately. As another example, a cable is constructed of wire, insulation, jacketing and may be marked with ink. Each of these materials is considered a homogeneous material.

3.0 Frequently Asked Questions

3.1 What is a Declaration of Non-Use (DoNU)?

The Molex DoNU supplements a bill of substances in order to help determine compliance to legal, industry, and customer product environmental requirements. A DoNU considers both substances that are intentionally added in the composition, and substances that may be present unintentionally as contaminants or trace substances in the product or component. The DoNU evaluates each homogeneous material against a list of prohibited and declarable substances. The DoNU certifies or confirms that none of the homogeneous materials in the product or component contain any prohibited substance above its respective maximum concentration value and reports any declarable substance above its respective threshold.

3.2 Why does Molex require a DoNU?

A Declaration of Non-Use is the method for Molex to obtain complete compliance information. Suppliers are able to indicate whether prohibited or declarable substances are contained in materials or parts, and this allows Molex to evaluate compliance to various requirements – not only legislative requirements, but industry- and customer-specific requirements as well. Proactively collecting data allows Molex to respond to changes in legislation more quickly and potentially reduces the supplier effort.

3.3 Are suppliers required to complete the DoNU?

All suppliers to Molex are required to complete the Declaration of Non-Use. Lack of cooperation will result in loss of preferred status and/or removal from Molex's Approved Vendor List, resulting in loss of future business.

3.4 Why is it not sufficient to just provide RoHS Certificate of Compliance?

Molex and its customers serve many markets, and therefore must abide by many pieces of legislation and customer requirements. The European Union (EU) Restriction of Hazardous Substances (RoHS) Directive; Registration, Evaluation, Authorization, and restriction of Chemicals (REACH) Regulation; and other legal requirements are driving the requirement for substance reporting at the homogeneous material level. In addition to legal requirements, many Molex customers require substances to be declared per industry standards, such as GADSL (Global Automotive Declarable Substance List), or the IEC 62474 – Material Declaration for Products of and for the Electrotechnical Industry.

In addition, major Molex customers with whom business is critical have devised custom declarable substance lists. These requirements go beyond legislation and industry standards – whether by listing a lower prohibited/declarable threshold, or listing additional substances.

Therefore, a RoHS Certificate of Compliance or similar document is not sufficient for Molex to meet all of its legal and other requirements.

Combined together, the DoNU allows suppliers to efficiently declare substances from one single list so Molex can meet all of its requirements, instead of requiring multiple documents (separate documents for RoHS, REACH, custom lists, etc.). The list of substances the DoNU applies to can be found using the **Molex CAS Number Search** Tool, which is also available on Molex's supplier portal (**www.suppliers.molex.com**).

3.5 What is an example of a correctly completed DoNU?

A DoNU shall be completed by suppliers for all materials/parts used by Molex. All homogeneous materials shall be considered separately (while REACH requires declaration of certain substances at the article level, Molex requests substance content of each homogeneous material as Molex's customers require this). If a homogeneous material of a part is not compliant per the DoNU, then the entire part is not compliant. The non-compliant material and substances contained shall be indicated as well in the space provided.

Example:

Molex, LLC.
Product Compliance

Declaration of Non-Use

Molex Part Number:	e.g. 01234567890
Supplier/Manufacturer:	e.g. Metals Fabricator LTD
Supplier Part Number:	e.g. ALLOY01
Material/Part Description:	e.g. Plated Steel

Does material/part contain any of the MCSS[1] **Prohibited** substances above the MCVs? ☒ **Yes** ☐ **No**

If Yes, please list[4] the substances (insert additional rows if necessary):

Material	Substance Group	Substance Name	CAS Number	Proportion (ppm)	Intentional/ Impurity	Purpose of Use	Applicable Exemption
Steel Alloy	Lead and its compounds	Lead	7439-92-1	3,000	Intentional	Free-Cutting Performance	Steel
Nickel Plating	Lead and its compounds	Lead	7439-92-1	600	Impurity	Impurity	Electroless nickel plating

Does material/part contain any of the MCSS **Phase-Out** AND/OR **Declarable** substances above the declarable thresholds? ☒ **Yes** ☐ **No**

If Yes, please list the substances (insert additional rows if necessary):

Material	Substance Group	Substance Name	CAS Number	Proportion (ppm)	Intentional/ Impurity	Purpose of Use
Nickel Plating	Nickel and its compounds	Nickel	7420-02-0	920,000	Intentional	Plating
Steel Alloy	Manganese and its compounds	Manganese	7439-96-5	11,500	Impurity	Impurity
Steel Alloy	Iron and its compounds	Iron	7439-89-6	993,000	Intentional	Main content

Signature John Doe **Date** e.g. May 4th, 2024

Name (print) e.g. John Doe **Title** e.g. Quality Manager

⚠ Ensure an actual signature is provided in the space provided (not a typed name) - a printed name is not acceptable.

3.6 Can multiple part numbers be included in one DoNU?

A supplier may include multiple part numbers, as long as the declaration is similar for all products. Any differences shall be made clear.

3.7 How often does the DoNU need to be completed?

Due to the ever-changing legislative requirements, a DoNU shall be completed by suppliers for each material/part used by Molex each time the MCSS is revised.

3.8 What's the difference between prohibited, phase-out, and declarable substances?

No substance identified as **Prohibited** in the MCSS may be contained (intentionally-added or as an impurity) in any homogeneous material at a concentration level that exceeds the maximum allowable threshold. No detectable level of banned substances is permitted. If an exemption is utilized, it shall be declared on the DoNU.

Phase-Out substances are targeted for gradual phase-out. By default, they must be reported if present above the designated threshold. If Molex customer bans or prohibits such substance, Molex in turn will also ban or prohibit that substance.

Declarable substances shall be declared to Molex if contained above their respective thresholds.

3.9 What are examples of materials and substances that might be in scope?

The following table lists examples of common parts and materials containing potentially prohibited, phase-out, and/or declarable substances:

Material or Component	Prohibited	Phase-Out	Declarable
Resins 	PBB decaBDE Red Phosphorus Bisphenol-A Antimony PFOA / PFOS RoHS phthalates	Phthalates Bromine Chlorine PFAS	Fibrous glass
Fasteners 	Lead Hex Chromium Cadmium	Beryllium	Aluminum Zinc Iron Copper
Resistors 	Lead		Nickel Manganese

3.10 Are CAS numbers available for the MCSS substances groups?

Molex makes available a list of known CAS numbers searchable for substance groups (**Molex Chemical Substances List**). Although it provides most of the substances known to Molex from regulations and customer requirements, it is not exhaustive. Suppliers are responsible for declaring substances contained in their product, even if the CAS number is not included in the list.

3.11 Are impurities prohibited? Do impurities have to be declared?

Many of the prohibited/declarable levels apply to intentionally-added substances and impurities. Unless indicated, the threshold applies to both intentionally-added substances and impurities. Molex's suppliers are responsible to declare prohibited and declarable substances, whether they are intentionally added to the material or exist as an impurity (e.g. introduced during the manufacturing process, or contained in a raw material). This may require the supplier to request information from their suppliers and investigate internal processes. Ultimately, the supplier shall certify that the material or part Molex receives meets all requirements.

3.12 Do the substance requirements only apply to certain materials/applications?

The prohibited/declarable level applies to all materials/applications, unless indicated in the 'Exemption' column.

3.13 Is it required to provide the DoNU even if the supply chain is complex?

Molex recognizes that its suppliers may procure materials or components from other suppliers. Just as Molex passes its customers' requirements to its suppliers, Molex's suppliers are expected to do the same. Molex's suppliers are expected to manage their supply base, and shall take whatever steps are necessary to meet Molex's requirements.

3.14 Is substance testing required to verify compliance?

Molex may require testing for specific substances from supplier, depending on whether if they are components or raw materials. Refer to the MCSS for full explanation.