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Product Compliance Traceability Requirements

Document Number and Revision: PROC-10103 Rev 02

Overview

This document provides guidance for complying with the worldwide hardware product compliance traceability requirements. Traceability is the ability to trace the history of the product including the tracing of the distribution chain (identification of the manufacturer and importer) and to provide a clear tie between the product being shipped and the applicable product compliance certifications. Both Oracle branded products and supplier branded products shipped by Oracle must comply.

Note: This document (PROC-10103) strictly addresses hardware compliance traceability requirements and does not address as-built product traceability or the special requirements for High Value Assets (HVAs).

- For details on as-built traceability requirements, please see 923-3406 *Supplier Traceability Requirements.*

- For details on HVA, please see PROC-10090 *Physical Security, Control, Traceability and Destruction of Supply Chain High Value Assets at External Manufacturers and Suppliers.*

Audience

Suppliers, Oracle Development Engineering, Oracle Sourcing, Oracle Services, Oracle Marketing and Hardware Technical Compliance Engineering

Table of Contents

ORACLE

1. Introduction

Hardware compliance traceability requirements allow tracing the history of the product and support marketing surveillance. Manufacturers and importers must provide traceability or clear documentary tie between the product being shipped and the applicable hardware product compliance certifications. All hardware products shipped by Oracle must comply including both Oracle branded products and supplier branded products shipped. Hardware products includes both system level products and separately shipped components (upgrade options and spares). While the requirement for hardware product compliance traceability is best documented by the European Union (EU), these requirements are expected and implied in the rules around the world (even if not well defined outside of the EU) so these rules impact all hardware product shipments and are enforced by governments (Customs and other agencies) worldwide.

2. Use

This document is intended for use by both Oracle internal entities for Oracle branded products and by supplier brand manufacturers for supplier branded products. For Oracle branded products, the implementation of the traceability described in this guide requires the involvement of many organizations including engineering, services and marketing. For supplier party branded products, additional parties involved includes the supplier itself and Oracle entities working with the supplier (sourcing and development engineering). As such, this document is written for an intended audience that is not working in the disciplines of ElectroMagnetic Compatibility (EMC), Safety or Restriction of Hazardous Substances (RoHS).

3. Hardware Product Compliance Traceability Requirements

3.1 Identify the Manufacturer

Each hardware product must be labeled with the manufacturer name, registered trade name or registered trade mark, and address. The manufacturer is not the factory (place that assembles the product) but the brand manufacturer that takes responsibility for the design and compliance of the product. This manufacturer information must be placed on the compliance label that provides the product's certification marks.

Note: Some markets will allow this manufacturer information (not the manufacturer name and trade mark) to be provided on the product's integrated display screen if the product has its own display screen with very few number of steps to retrieve this information (not on web based information). Contact the supporting Oracle compliance engineer to discuss these options if the product does have an integrated display screen.

Supporting Citations

- Manufacturer definition: "An organization, situated at a stated location or stated locations, that carries out or controls such stages in the process of bringing a product to the market as manufacture, assessment, verification, handling and storage of a product. A Manufacturer has full responsibility for continued compliance of the product with the relevant requirements and undertakes all obligations in that connection." IECEE Definitions, Edition 7.0, dated 2020-06, section 8.

- Factory definition: "The location at which the product is produced or assembled." IECEE Definitions, Edition 7.0, dated 2020-06, section 15.

- Manufacturer requirement: "Indicate the following three elements: their (1) name, registered trade name or registered trade mark and (2) the address at which they can be contacted, on the product or, where that is not possible, on its packaging or in a document accompanying the product. The address must indicate a single point at which the manufacturer can be contacted." EU Blue Guide (2022), section 4.2.2.

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3.2 Identify the Importer

For imported products (those shipped to a market outside of the country of origin), the importer name and address must be identified. However, Oracle ships product worldwide and the actual importer is different for each country, and Oracle product offerings may be imported by multiple different entities even for shipments to a single country. Hence, it is not practical to label an importer name on the product itself. Instead, Oracle identifies the importer on shipping documentation (the commercial invoice) which accompanies the hardware product shipment.

Supporting Citations

- Importer requirement: "Importers must also indicate the following elements: their (1) name, registered trade name or registered trade mark and (2) the address at which they can be contacted on the product, or, where that is not possible, on its packaging or in a document accompanying the product…. As a rule, the identification and the address of importer must be indicated on the product. Only where it is not possible, the identification and address of the importer may be indicated on the packaging and/or in a document accompanying the product. This may be the case when the importer would have to open the packaging to put his name and address." EU Blue Guide (2022), section 4.2.2.2.

3.3 Identify the Hardware Product

The product must bear on the product itself a type, batch, serial or model number or other element allowing its identification. This compliance identification (ID) must be consistent with the identification used in any associated hardware product compliance approvals including agency certifications and manufacturer declarations of conformity.

Notes

1. There are some exceptions to product exterior labeling in circumstance when the product is too small or other factors. Products with an integrated display screen could report this information if made easily accessible upon turning on the product. Contact the supporting Oracle compliance engineer to discuss these options if the product is small in size or it has an integrated screen.

2. For Oracle branded products, Oracle uses a "compliance model number" as the product compliance identification (ID). Other manufacturers may have a similar concept called a regulatory model number, or some merely use a family part number as the product compliance identification. This product compliance identification must be labeled on the product.

Supporting Citations

- Product identification requirement: "The product must bear a type, batch, serial or model number or other element allowing its identification. The identification must, as a rule, be affixed to the product. However, it may exceptionally be moved from the product if this rule cannot be followed. This would be justified where the size and/or the nature of the product makes the indication illegible or technically impossible. In such cases, the identification has to be affixed to the packaging, if it exists, and/or to the accompanying document. The identification on the product may neither be omitted nor be moved to the packaging or accompanying documents on purely aesthetic or economic grounds. It is up to the manufacturer to make this assessment." EU Blue Guide (2022), section 4.2.2.5.

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3.4 Correlate the Product Compliance Identification to the Product Identified in the Shipping Documentation

As the hardware product compliance rules are often enforced in Customs, the description of the product shipped on shipping documentation must have a clear correlation path to the compliance identification used in any hardware product compliance approvals applicable to the markets to which the product is shipped and used. For some countries (especially India), the Customs agent will review the shipment documentation and might never actually see the physical shipment. There are two key elements that must be correlated (show connection): the manufacturer name and the compliance identification. For the quickest Customs clearance, include both elements in the part number and description which is placed on the commercial invoice for shipments. Otherwise, extra explanations and supporting documentation may be required to tie the product being shipped to the necessary hardware product certifications for that country.

To avoid delays in Customs, supporting documentation should be on hand to quickly respond to Customs queries. Examples of supporting documentation are listed in order of preference:

- product data sheet/catalog (preferred)
- manufacturer's signed declaration of conformity
- product drawing
- manufacturer's signed declaration of similarity (Oracle couples this with a declaration of equivalence)
- product specification

These will only suffice if both bullets below are included in the supporting document:

- Manufacturer name and product compliance identification {*ties to the product's compliance certifications*}
- Part number or marketing name within the part description {*ties to the part number or part description on the commercial invoice*}

If the description on the commercial invoice does not already have the manufacturer name and product compliance identification on it, then one possible solution is to rely on the manufacturer's supporting document to provide the link. See the figure below.

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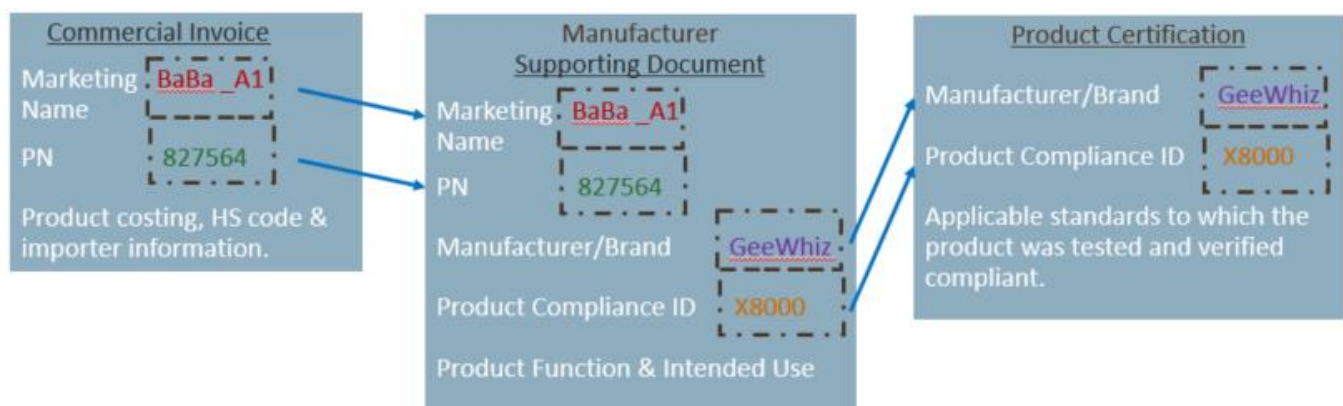
Appendix A: Acronyms

DOC	Declaration of Conformity
DOE	Declaration of Equivalence
DOS	Declaration of Similarity
EMC	ElectroMagnetic Compatibility
EU	European Union
IEC	International Electrotechnical Commission

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Appendix B: Declaration of Similarity (DOS) Template

There is no mandatory format for a Declaration of Similarity (DOS). The below template provides a starting point for a 3rd party manufacturer in creating one. Each product compliance ID must have its own DOS, but the product compliance ID may apply to many part numbers. In place of "<Manufacturer Name>" placeholder headings, the manufacturer will substitute the actual corporate name of the manufacturer. Oracle will provide the right column information to the manufacturer. The DOS must be signed and dated on corporate letterhead stationery.

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<MANUFACTURER LETTERHEAD>

Declaration of Similarity (DoS)

The undersigned authority declares that the below listed Oracle product and the <MANUFACTURER NAME> are identical in all electrical safety and electromagnetic aspects from a regulatory point of view.

	<Manufacturer Name>	Oracle
Product Marketing Name(s)		
Product Part Number(s)	<Optional, otherwise "N/A">	
Product Compliance ID	<ID on CB Cert>	N/A

Oracle America, Inc. has permission to leverage <MANUFACTURER NAME>'s agency certificates for the purposes of import and customs clearance into countries for which the certificates are applicable. The product sold to Oracle retains the <MANUFACTURER NAME> regulatory markings as required relating the goods to <MANUFACTURER NAME>'s agency certificates. Oracle is required to retain these product markings if it intends to leverage <MANUFACTURER NAME>'s certification documents. Otherwise, re-certification in Oracle's name may be required.

<Manufacturer Signature and date>
_____
<Manufacturer Signatory Name>
<Manufacturer Signatory Job Title>
<Manufacturer Corporate Name>
<Manufacturer Corporate Address>
<Manufacturer Corporate Web Address>

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Related Information

Reference Documents and Records

DOCUMENT NUMBER	DOCUMENT TITLE
923-3406	Supplier Traceability Requirements
PROC-10090	Physical Security, Control, Traceability and Destruction of Supply Chain High Value Assets at External Manufacturers and Suppliers

Document History

REV	DATE	DESCRIPTION OF CHANGE
02	08/18/2022	Initial Release

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➢ For questions or comments about this document, please send an email to: eso_business_docs_us_grp@oracle.com

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