





# **Conformity of Production Compliance Statement**

VCA as the Type Approval Authority for the United Kingdom has conducted an assessment of the quality systems and the relevant control plans to verify Compliance with Schedule 1 of Revision 3 of the E/ECE/TRANS/505 Agreement done at Geneva on 20 March 1958. The assessment was conducted in accordance with the requirements of this Regulation

This Compliance Statement is issued to:

O'Sullivan Films, Inc. 1944 Valley Avenue Winchester, VA 22601 USA

Date of Issue: 17 February 2022 Areas assessed: See Annex

Registration Number: UCY559144 Vehicle Categories: Not applicable

Vehicle Category/Component Range: The Manufacture of Panes of Flexible Plastics other

than Windscreens.

Assembly sites: See overleaf Planned date of monitoring visit: No Visit

Currently Required.

Signed for and on behalf of Vehicle Certification Agency

Alex Kubinski

President- VCA Americas

## By authority of the Chief Executive

This Compliance Statement is issued by and is the property of the Vehicle Certification Agency,

1 The Eastgate Office Centre, Eastgate Road, Bristol BS5 6XX, UK and is to be returned on formal request

Vehicle Certification Agency

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**Assembly Plants:** 

O'Sullivan Films, Inc. 1944 Valley Avenue Winchester, VA 22601 **USA** 

Manufacturer's EU Representative:

**Not Applicable** 

Manufacturer's GB / NI Representative:

**Not Applicable** 





### General Information

- There may be additional surveillance visits carried out during the validation period
- · Audits conducted at approval holders may lead to audits at assembly plants and vice versa
- Validity of this Compliance Statement for the duration stated is dependent on ISO/IATF certificates being supplied before their expiry.

#### Please note:

VCA requires that type approval holders stay with their original Technical Service and that moves from one Technical Service to another are only possible in exceptional circumstances. In the case where this is required please consult the appropriate VCA team.

#### Areas assessed:

Relevant processes and procedures required by mentioned legislation in following sheets and including: Schedule 1 of Revision 3 of the E/ECE/TRANS/505 1958

#### **Documents examined:**

Relevant CoP documentation including Quality Documents, ISO/IATF certificate(s), procedures, control plans.

Other Member State approvals checked at time of audit:

None



## List of legislation covered by this compliance statement

Whole Vehicle	Regulation (ECE)	Directive (EC)	Regulation (EU)¹	Applicable
International Whole Vehicle Type Approval (IWVTA)	0			No
UK(NI) / GB in line with 2018/858/EU (WVTA)			2018/858	No
UK(NI) / GB in line with Small Series (KS18/858)			2018/858	No
UK(NI) / GB in line with 2007/46/EC (WVTA)		2007/46		No
UK(NI) / GB in line with Small series (KS07/46)		2007/46		No

Whole Vehicle United Kingdom National	Part 2	Part 3	Part 4
National Small Series Type Approval (NKS) SI 2020 No. 818 Schedule 1.	No	No	No
National Small Series Type Approval (NKS) SI 2009 No. 717 Schedule 4.	No	No	No

1	Item	Subject	Dir (EC) <sup>1</sup>	Reg (EU) <sup>1</sup>	Reg (ECE)	Installation	Component
Emissions (Euro 5 and 6) light-duty vehicles/access to information   715/2007   No	1	Permissible sound level	70/157			No	
A	1A	Sound level		540/2014	51	No	No
3A	2A	duty vehicles/access to		715/2007		No	No
tanks   Rear underrun protective devices   Rear underrun protective devices   Rear underrun protective devices   Rear underrun protection (RUP)   Rear registration plate space   70/222   No   No   Space for mounting and fixing rear registration plates   Forestation plates   Rear registration	3	-	70/221			No	No
38	3A	tanks)		661/2009	34	No	No
4A         Space for mounting and fixing rear registration plates         661/2009 1003/2010         No           5         Steering effort         70/311         No           5A         Steering equipment         661/2009         79         No           6         Door latches and hinges         70/387         No         No           6AA         Vehicle access and manoeuvrability (steps, running boards and handholds)         661/2009 11         No         No           6B         Door latches and door retention components         661/2009 11         No         No           7         Audible warning Directive         70/388         No         No         No           8         Indirect vision devices and signals         661/2009 28         No         No         No           8         Indirect vision devices         2003/97         No         No         No           8A         Devices for indirect vision and their installation         661/2009         46         No         No           9         Braking         71/320         No         No         No           9B         Braking of vehicles and trailers         661/2009         13         No         No           10         Radio interference (electromagnetic compatibil	3B	(RUPDs) and their installation;		661/2009	58	No	No
1003/2010   No   No	4		70/222			No	
5A         Steering equipment         661/2009         79         No           6         Door latches and hinges         70/387         No           Vehicle access and manoeuvrability (steps, running boards and handholds)         661/2009         No           6B         Door latches and door retention components         661/2009         11         No           7         Audible warning Directive         70/388         No         No         No           8         Indirect vision devices and signals         661/2009         28         No         No           8A         Indirect vision devices         2003/97         No         No         No           9B         Braking         71/320         No         No         No           9A         Braking of vehicles and trailers         661/2009         13         No         No           9B         Braking of passenger cars         661/2009         13-H         No         No           10         Radio interference (electromagnetic compatibility)         72/245         No         No         No           11         Diesel Smoke         72/306         24         No           12         Interior fittings         74/60         No         No         <	4A					No	
6 Door latches and hinges  70/387  Vehicle access and manoeuvrability (steps, running boards and handholds)  6B Door latches and door retention components  7 Audible warning Directive  70/388  No  No  No  No  No  No  No  No  No	5	Steering effort	70/311			No	
Vehicle access and manoeuvrability (steps, running boards and handholds)  6B Door latches and door retention components  7 Audible warning Directive  7A Audible warning devices and signals  8 Indirect vision devices  9 Braking  9 Braking  9 Braking of vehicles and trailers  9 Braking of passenger cars  10 Radio interference (electromagnetic compatibility)  10 Interior fittings  10 Interior fittings  11 No  8661/2009  11 No  8661/2009  11 No  8661/2009  12 No  8661/2009  13 No  8661/2009  13 No  8661/2009  13 No  872/245  8861/2009  14 No  8861/2009  15 No  8861/2009  16 No  8861/2009  17 No  8861/2009  18 No  8861/2009  19 No  8861/2009  10 No  8861/2009  10 No  10 No  10 Radio interference (electromagnetic compatibility)  10 Radio interference (alectromagnetic compatibility)  11 Diesel Smoke  12 Interior fittings  13 Anti-theft and immobiliser  14/61	5A	Steering equipment		661/2009	79	No	
6A manoeuvrability (steps, running boards and handholds)  6B Door latches and door retention components  7 Audible warning Directive  7 Audible warning Directive  7 Audible warning devices and signals  8 Indirect vision devices  9 Braking  9 Braking  9 Braking  9 Braking of vehicles and trailers  9 Braking of passenger cars  10 Radio interference (electromagnetic compatibility)  10 Electromagnetic compatibility  10 Diesel Smoke  10 Interior fittings  10 Interior fittings  11 No  12 Interior fittings  13 Ovo  14 No  15 Ovo  16 Ovo  17 No  18 No  18 No  19 No  10 No  10 No  10 No  11 Diesel Smoke  12 Interior fittings  13 Ovo  14 No  15 Ovo  16 Ovo  17 Ovo  18 No  18 No  19 No  10 No  10 No  11 Diesel Smoke  12 Interior fittings  13 Ovo  14 No  15 Ovo  16 Ovo  17 Ovo  18 No  18 No  19 No  10 No  10 No  10 No  11 No  12 Interior fittings  13 Ovo  14 No  15 Ovo  16 Ovo  17 Ovo  17 Ovo  18 No  18 No  19 No  10 No  10 No  10 No  11 No  12 Interior fittings  13 Ovo  14 No  15 Ovo  16 Ovo  17 Ovo  17 Ovo  18 No  18 No  19 No  10 No  10 No  10 No  11 No  11 No  12 Interior fittings  13 Ovo  14 No  15 Ovo  16 Ovo  17 Ovo  17 Ovo  18 No  18 No  19 No  10 No  10 No  10 No  11 No  11 No  12 No  13 Ovo  14 No  14 No  15 Ovo  16 Ovo  17 Ovo  17 Ovo  18 No	6	Door latches and hinges	70/387			No	
components 7 Audible warning Directive 70/388     No No No No Audible warning devices and signals 8 Indirect vision devices 2003/97 No	6A	manoeuvrability (steps, running				No	
Audible warning devices and signals  Reference   Audible warning devices   Audible warning   Audible warning   Audible warning devices   Audible warning   Audible warni	6B			661/2009	11	No	
signals  8 Indirect vision devices  2003/97  No	7	Audible warning Directive	70/388			No	No
BA Devices for indirect vision and their installation  9 Braking  71/320  9A Braking of vehicles and trailers  9B Braking of passenger cars  10 Radio interference (electromagnetic compatibility)  10A Electromagnetic compatibility  10 Diesel Smoke  72/306  12 Interior fittings  13 No	7A			661/2009	28	No	No
8A         their installation         661/2009         46         No         No           9         Braking         71/320         No         No           9A         Braking of vehicles and trailers         661/2009         13         No           9B         Braking of passenger cars         661/2009         13-H         No           10         Radio interference (electromagnetic compatibility)         72/245         No         No         No           10A         Electromagnetic compatibility         661/2009         10         No         No           11         Diesel Smoke         72/306         24         No           12         Interior fittings         74/60         No           12A         Interior fittings         661/2009         21         No           13         Anti-theft and immobiliser         74/61         No         Approval         Noertification	8	Indirect vision devices	2003/97			No	No
9A Braking of vehicles and trailers  9B Braking of passenger cars  10 Radio interference (electromagnetic compatibility)  10A Electromagnetic compatibility  10 Diesel Smoke  11 Diesel Smoke  12 Interior fittings  13 No  14 No	8A			661/2009	46	No	No
9B Braking of passenger cars  10 Radio interference (electromagnetic compatibility)  10A Electromagnetic compatibility  10 Diesel Smoke  11 Diesel Smoke  12 Interior fittings  13 Anti-theft and immobiliser  14 Office of the passenger cars  15 Office of the passenger cars  16 Office of the passenger cars  17 Office of the passenger cars  18 Office of the passenger cars  19 Office of the passenger cars  10 Office of the passenger cars  11 Office of the passenger cars  12 Office of the passenger cars  13 Office of the passenger cars  14 Office of the passenger cars  15 Office of the passenger cars  16 Office of the passenger cars  16 Office of the passenger cars  18 Office of the passenger cars  19 Office of the passenger cars  10 Office of the passenger cars  11 Office of the passenger cars  12 Office of the passenger cars  13 Office of the passenger cars  14 Office of the passenger cars  15 Office of the passenger cars  16 Office of the passenger cars  17 Office of the passenger cars  17 Office of the passenger cars  18 Office of the passenger cars  19 Office of the passenger cars  10 Office of the passeng	9	Braking	71/320			No	
10 Radio interference (electromagnetic compatibility) 10A Electromagnetic compatibility 10 Radio interference (electromagnetic compatibility) 10A Electromagnetic compatibility 10A Diesel Smoke 11 Diesel Smoke 12 Interior fittings 13 Anti-theft and immobiliser 14 No 15 No 1661/2009 17 No 17 No 18 No 18 No 19 No 19 No 10 No 10 No 11 No 11 No 12 No 13 Anti-theft and immobiliser 17 No 18 No 19 No 19 No 10 No 10 No 10 No 10 No 11 No 11 No 12 No 13 No 14 No 15 No 16 No 17 No 17 No 18 No	9A	Braking of vehicles and trailers		661/2009	13	No	
10 (electromagnetic compatibility) 10A Electromagnetic compatibility 10A Diesel Smoke 11 Diesel Smoke 12 Interior fittings 12A Interior fittings 13 Anti-theft and immobiliser 172/245 180 No 190 No 10 No 11 No 11 No 12 No 12 No 13 Anti-theft and immobiliser 14/61	9B	Braking of passenger cars		661/2009	13-H	No	
11 Diesel Smoke 72/306 24 No 12 Interior fittings 74/60 No 12A Interior fittings 661/2009 21 No 13 Anti-theft and immobiliser 74/61 No Approval Noertification	10		72/245			No	No
12Interior fittings74/60No12AInterior fittings661/200921No13Anti-theft and immobiliser74/61NoApproval Noertification	10A	Electromagnetic compatibility		661/2009	10	No	No
12A Interior fittings 661/2009 21 No Vehicle 13 Anti-theft and immobiliser 74/61 No Approval Noertification	11	Diesel Smoke	72/306		24	No	
13 Anti-theft and immobiliser 74/61 No Approval No App	12	Interior fittings	74/60			No	
13 Anti-theft and immobiliser 74/61 No Approval Noertification	12A	Interior fittings		661/2009	21	No	
	13	Anti-theft and immobiliser	74/61			No	Approval <b>No</b> ertification

13A	Protection of motor vehicles against unauthorised use		661/2009	18	No	
13B	Protection of motor vehicles against unauthorised use		661/2009	116	No	No
14	Protective steering	74/297			No	
14A	Protection of the driver against the steering mechanism in the event of impact		661/2009	12	No	
15	Seat strength	74/408			No	No
15A	Seats, their anchorages and any head restraints		661/2009	17	No	
15B	Seats of large passenger vehicles		661/2009	80	No	No
16	Exterior projections	74/483			No	No
16A	External projections		661/2009	26	No	No
17	Speedometer and reverse gear	75/443			No	
17A	Vehicle access and manoeuvrability (reverse gear)		661/2009 130/2012		No	
17B	Speedometer equipment including its installation		661/2009	39	No	No
18	Statutory Plates	76/114			No	
18A	Manufacturer's statutory plate and vehicle identification number		661/2009 19/2011		No	
19	Seat-belt anchorages	76/115			No	
19A	Safety-belt anchorages, Isofix anchorages systems and Isofix top tether anchorages		661/2009	14	No	
20	Installation of lighting and light signalling devices	76/756			No	
20A	Installation of lighting and light- signalling devices on vehicles		661/2009	48	No	
21	Retro reflectors	76/757				No
21A	Retro-reflecting devices for power- driven vehicles and their trailers Regulation		661/2009	3		No
22	End-outline, front-position (side), rear-position (side), stop, side marker, daytime running lamps	76/758				No
22A	Front and rear position lamps, stop-lamps and end-outline marker lamps for motor vehicles and their trailers		661/2009	7		No
22B	Daytime running lamps for power- driven vehicles Regulation •••••••rt		661/2009	87		No
22C	Side-marker lamps for motor vehicles and their trailers		661/2009	91		No
23	Direction indicators	76/759				No
23A	Direction indicators for power- driven vehicles and their trailers		661/2009	6		No
24	Rear registration plate lamps	76/760				No
24A	Illumination of rear-registration plates of power-driven vehicles and their trailers		661/2009	4		No
25	Headlamps (including bulbs)	76/761				No
25A	Power-driven vehicle's sealed- beam headlamps (SB) emitting an European asymmetrical passing beam or a driving beam or both		661/2009	31		No
_						Vehicle

25B	Filament lamps for use in approved lamp units of power-driven vehicles and their trailers		661/2009	37		No
25C	Motor vehicle headlamps equipped with gas-discharge light sources		661/2009	98		No
25D	Gas-discharge light sources for use in approved gas-discharge lamp units of power-driven vehicles		661/2009	99		No
25E	Motor vehicle headlamps emitting an asymmetrical passing beam or a driving beam or both and equipped with filament lamps and/or LED modules		661/2009	112		No
25F	Adaptive front-lighting systems (AFS) for motor vehicles		661/2009	123		No
26	Front fog lamps	76/762				No
26A	Power-driven vehicle front fog lamps		661/2009	19		No
27	Towing hooks	77/389			No	
27A	Towing device		661/2009 1005/2010		No	
28	Rear fog lamps	77/538				No
28A	Rear fog lamps for power- driven vehicles and their trailers		661/2009	38		No
29	Reversing lamps	77/539				No
29A	Reversing lights for power- driven vehicles and their trailers		661/2009	23		No
30	Parking lamps	77/540				No
30A	Parking lamps for power- driven vehicles		661/2009	77		No
31	Seat-belts and restraint systems	77/541			No	No
31A	Safety-belts, restraint systems, child restraint systems and Isofix child restraint systems		661/2009	16	No	No
32	Forward vision	77/649			No	
32A	Forward field of vision		661/2009	125	No	
33	Identification of controls, telltales and indicators	78/316			No	
33A	Location and identification of hand controls, tell-tales and indicators		661/2009	121	No	
34	Defrost/demist	78/317			No	
34A	Windscreen defrosting and demisting systems		661/2009 672/2010		No	
35	Wash/wipe	78/318			No	No
35A	Windscreen wiper and washer systems		661/2009 1008/2010		No	No
36	Heating systems	2001/56			No	No
36A	Heating systems		661/2009	122	No	No
37	Wheel guards	78/549			No	
37A	Wheel guards		661/2009 1009/2010		No	
38	Head restraints	78/932			No	No
38A	Head restraints (headrests), whether or not incorporated in vehicle seats		661/2009	25	No	No
40	Engine Power	80/1269			No	Vehicle
40	Engine Power	80/1269			No	

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41	Emissions (Euro IV and V) heavy duty vehicles	2005/55		49	No	No
41A	Emissions (Euro IV) heavy duty vehicles / access to information		595/2009		No	No
41B	CO2 Heavy Goods Emissions and Fuel Consumption		2017/2400		No	
42	Lateral protection	89/297			No	No
42A	Lateral protection of goods	00/201	661/2009	73	No	No
	vehicles	04/000	001/2009	73		
43	Spray suppression systems	91/226	661/2009		No	No
43A	Spray suppression systems		109/2011		No	No
44	Masses and dimensions (cars)	92/21	004/0000		No	
44A	Masses and dimensions		661/2009 1230/2012		No	
45	Safety glazing	92/22			No	No
45A	Safety glazing materials and their installation on vehicles		661/2009	43	No	Yes
46	Tyres	92/23			No	
46A	Installation of tyres		661/2009 458/2011		No	
46B	Pneumatic tyres for motor vehicles and their trailers (Class C1)		661/2009	30		No
46C	Pneumatic tyres for commercial vehicles and their trailers (Classes C2 and C3)		661/2009	54		No
46D	Tyre rolling sound emissions, adhesion on wet surfaces and rolling resistance (Classes C1, C2 and C3)		661/2009	117		No
46E	Temporary-use spare unit, run-flat tyres/system and tyre pressure monitoring system		661/2009	64	No	No
47	Speed limitation devices	92/24			No	No
47A	Speed limitation of vehicles		661/2009	89	No	No
48	Masses and dimensions (vehicles other than cars)	97/27			No	
48A	Masses and dimensions		661/2009 1230/2012		No	
49	External projections of cabs	92/114			No	
49A	Commercial vehicles with regard to their external projections forward of the cab's rear panel		661/2009	61	No	
50	Couplings	94/20			No	No
50A	Mechanical coupling components of combinations of vehicles		661/2009	55	No	No
50B	Close-coupling device (CCD); fitting of an approved type of CCD		661/2009	102	No	No
51	Flammability	95/28			No	No
51A	Burning behaviour of materials used in the interior construction of certain categories of motor vehicles		661/2009	118	No	No
52	Buses and coaches	2001/85			No	
52A	M2 and M3 vehicles		661/2009	107	No	No
52B	Strength of the superstructure of large passenger vehicles		661/2009	66	No	253
53	Frontal impact	96/79			No	UK Vehicle
						Approval Certification Authority Agency

53A	Protection of occupants in the event of a frontal collision		661/2009	94	No	
54	Side impact	96/27			No	
54A	Protection of occupants in the event of lateral collision		661/2009	95	No	
56	Vehicles intended for the transport of dangerous goods	98/91			No	
56A	Vehicles for the carriage of dangerous goods		661/2009	105	No	
57	Front under-run protection	2000/40			No	No
57A	Front underrun protective devices (FUPDs) and their installation; front underrun protection (FUP)		661/2009	93	No	No
58	Pedestrian protection		78/2009		No	
59	Recyclability	2005/64			No	
61	Air-conditioning systems	2006/40			No	No
62	Hydrogen system		79/2009		No	No
63	General safety		661/2009		No	
	·		661/2009			
64	Gear shift indicators		65/2012		No	
65	Advanced emergency braking system		661/2009 347/2012		No	
66	Lane departure warning system		661/2009		No	
67	Specific components for liquefied petroleum gases (LPG) and their installation on motor vehicles		351/2012 661/2009	67	No	No
68	Vehicle alarm systems (VAS)		661/2009	97	No	No
69	Electric safety		661/2009	100	No	140
70	Specific components for CNG and their installation on motor vehicles		661/2009	110	No	No
71	Cab strength		661/2009	29	No	
72	eCall system		2015/758		No	
-	Construction, testing, installation, operation and repair of tachographs and their components		3821/85			No
-	Non-road mobile machinery	97/68		120		No
-	Protective Helmets			22		No
-	Diesel Smoke			24	No	No
-	Warning Triangles			27		No
-	Rear end collision			32	No	
-	Head on collision			33	No	
_	Foot controls			35	No	
_	PSV construction			36	No	
_	Child Restraints			44	110	No
	Headlamp cleaners			45	No	No
	·			59	INO	
-	Replacement Silencers					No
-	Special warning lamps			65	N.I	No
-	Maximum speed			68	No	
-	Rear marking plates for slow moving vehicles			69		No
	Rear marking plates for heavy and long vehicles			70		No
-	Emissions of M1 and N1 vehicles			83	No	

-	Fuel consumption	84	No	
-	Measurement of the net power	85	No	
-	Replacement braking parts	90		No
_	CO <sub>2</sub> Emissions and fuel	101	No	
	consumption			NI.
-	Replacement Catalytic Convertors	103		No
-	Retro-reflective markings	104		No
-	Pneumatic tyres for agricultural vehicles and their trailers	106		No
-	Retreaded pneumatic tyres for motor vehicles and their trailers	108		No
-	Retreaded pneumatic tyres for commercial vehicles and their trailers	109		No
-	Rollover stability of tanks	111	No	
-	Headlamps emitting an asymmetrical passing-beam	112		No
-	Headlamps emitting a symmetrical passing-beam	113		No
-	Airbag module for a replacement airbag system	114		No
-	LPG and CNG Retrofit systems	115	No	No
-	Tyre road noise	117		No
-	Cornering Lamps for Power Driven Vehicles	119		No
-	Wheels for passenger cars and their trailers	124		No
-	Partitioning systems	126		No
-	Pedestrian safety	127	No	
-	LED light sources	128		No
-	Enhanced child restraint systems	129		No
-	Lane departure warning systems	130	No	
-	Advanced emergency braking systems	131	No	
-	Retrofit emission control devices	132	No	No
-	Recyclability of motor vehicles	133	No	
-	Hydrogen and fuel cell vehicles	134	No	No
-	Pole side impact	135	No	
-	Frontal impact with focus on restraint systems	137	No	
-	Quiet road transport vehicles (QRTV)	138	No	No
-	Brake assist systems (BAS)	139	No	
-	Electronic stability control (ESC)	140	No	
-	Tyre pressure monitoring systems (TPMS)	141	No	
-	Tyre Installation	142	No	
-	Heavy Duty Dual-Fuel Engine Retro-fit Systems	143	No	
-	Accident Emergency Call Systems	144	No	
-	ISOFIX anchorage systems, ISOFIX top tether anchorages and i-size seating positions	145	No	
_	Hydrogen and Fuel Cell Vehicles of category L	146	No	( a & a

-	Mechanical coupling components of combinations of agricultural vehicles	147	No	
-	Light Signalling Devices	148	No	
-	Road Illumination Devices	149	No	
-	Retro-reflective Devices	150	No	
-	Blind Spot Information Systems	151	No	
-	Advanced Emergency Braking Systems	152	No	
-	cyber security & cybersecurity management systems	155	No	
-	Software Update & Software Update Management System	156	No	
-	Automatic Lane Keeping System (ALKS)	157	No	

<sup>&</sup>lt;sup>1</sup> Compliance to the legislation stated is to UK(NI) and GB standards only and not EC/EU.

**REMARKS:** None