

April 2024

Information Material Compliance

With this letter, the company Dörrenberg Edelstahl GmbH (hereinafter referred to as DE) provides information on how to deal with internationally applicable substance regulations.

16-4-5-1 Information Material Compliance english Rev01 CASTEON

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1 RoHS-guideline 2011/65/EU and guideline 2015/863/EU

1.1 Requirement

The RoHS directives (Restriction of Hazardous Substances) [4] regulate the use and marketing of hazardous substances in electrical devices and electronic components. The aim is to reduce hazardous substances in electrical and electronic equipment.

List of restricted substances and maximum allowable concentrations in homogeneous materials in percent by weight (wt%):

Lead	0,1 wt%	Polybromierte Diphenylether (PBDE)	0,1 wt%
Mercury	0,1 wt%	Di(2-ethylhexyl)phthalat (DEHP)	0,1 wt%
Cadmium	0,01 wt%	Butylbenzylphthalat (BBP)	0,1 wt%
Hexavalent Chromium	0,1 wt%	Dibutylphthalat (DBP)	0,1 wt%
Polybromierte Biphenyle (PBB)	0,1 wt%	Diisobutylphthalat (DIBP)	0,1 wt%

According to exception 6a in Annex III of the RoHS directive, lead as an alloying element in steel for machining purposes and in galvanized steel may not exceed 0.35 wt% for certain applications.

1.2 Confirmation

Manufacturing and purchasing the products we produce are based on manufacturing and supplier specifications. This ensures that the maximum concentrations mentioned above are observed.

DE hereby confirms that these substances, which occur in the electronics industry, are not deliberately used in the manufacture of cast and forged steel and their concentration, if any, is well below the respective limit concentrations.

In addition, we cannot confirm whether and to what extent our products are built into electronic components, because we only manufacture semi-finished products.

2 REACH Regulation (EG) Nr. 1907/2006

The materials, castings, semi-finished products, steel products and all surface-treated products manufactured by DE comply with the REACH Regulation [European Chemicals Regulation (Registration, Evaluation, Authorization and Restriction of Chemicals; Registration, Evaluation, Authorization and Restriction of Chemicals)] about products. Products are subject to neither registration, assessment nor approval. The creation of safety data sheets for products is not required.

2.1 Information according to Article 33, SVHC [2]

Article 33 (1) of the REACH regulation obliges companies to inform their commercial customers if their products contain a substance from the SVHC candidate list with more than 0.1 percent by weight (wt%).

2.1.1 Confirmation

We comply with the obligation according to Article 33 of the REACH regulation and inform our customers immediately if, according to the latest information, "substances of very high concern" from the SVHC candidate list are contained in our products above the limit of 0.1 wt%.

2.2 Restriction of Substances [1]

Annex XVII of the REACH regulation contains a list of restrictions on the manufacture, placing on the market and use of certain hazardous substances, mixtures and articles.

2.2.1 Confirmation

DE suppliers are obliged to comply with the restrictions for the manufacture, placing on the market and use of substances and mixtures specified in Annex XVII of the REACH regulation. DE checks the substance restrictions according to Annex XVII.

Based on the information currently available and the current legal status, DE products meet the requirements of Annex XVII.

2.3 Explanation PFAS (Per- and Polyfluoralkylsubstances)

PFAS is a group of synthetic chemicals that are widely distributed in society and found in the environment. They all contain carbon-fluorine bonds, which are among the strongest chemical bonds in organic chemistry. This means that they are persistent, both in use and in the environment.

2.3.1 Requirement

After perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), from 2023 the manufacture, use and placing on the market of perfluorinated carboxylic acids with 9-14 carbon atoms (C9-C14-PFCA) will also be subject to REACH in the EU limited. The substances are listed in Annex XVII of the REACH regulation (see section 2.2 "Restriction of substances [1]"). This restriction also includes the salts of C9-C14 PFCA and substances that can be broken down or converted to these carboxylic acids, so-called precursor compounds.

2.3.2 Confirmation

According to the information currently available and based on the information provided by our suppliers, DE does not use any of these substances in the products to be manufactured. The substances are also not added on purpose.

3 POP-Convention, Regulation (EU) 2019/1021

The Stockholm Convention on POPs (Persistent Organic Pollutants) has been adopted into national law by various countries and regulated in the European Union by Regulation (EC) No. 2019/1021.

3.1 Requirement

The ordinance establishes binding prohibition and restriction measures for certain persistent organic pollutants.

3.2 Confirmation

According to the information currently available, we can confirm that the substances listed in Annexes I and II of Directive (EU) 2019/1021 are not contained in our products. The substances are also not added on purpose.

4 TSCA-Confirmation [5]

The Toxic Substances Control Act (TSCA) is a US chemical regulatory norm. The Environmental Protection Agency (EPA) is responsible for its implementation.

The following substances have been classified as PBT:

Phenol, isopropylated phosphate (3:1) (PIP (3:1))	CAS-No: 68937-41-7
2, 4, 6-tris(tert-butyl)phenol (2, 4, 6-TTBP)	CAS-No: 732-26-3
Hexachlorobutadiene (HCBD)	CAS-No: 87-68-3
Pentachlorothiophenol (PCTP)	CAS-No: 133-49-3
Decabromodiphenyl ether (decaBDE)	CAS-No: 1163-19-5

4.1 Confirmation

This is to confirm that our products are free from substances classified as PBT (Persistent, Bioaccumulative and Toxic) according to EPA TSCA Section 6. We have no information to the contrary from our suppliers.

5 Substances, which lead to the depletion of the ozone layer (Montreal Protocol)

Substances that lead to the depletion of the ozone layer (OzDS) are stipulated by an international agreement in the Montreal Protocol. In the European Union, this is regulated by Regulation (EC) No. 1005/2009 of September 16th, 2009 on substances that deplete the ozone layer.

The ordinance regulates the production, import, export, placing on the market, use, recovery, recycling, processing and destruction of ozone-depleting substances. It specifies reporting requirements and measures for products and equipment containing these substances.

5.1 Confirmation

DE does not use any of these substances to manufacture the products. The substances are also not added on purpose.

6 SCIP-Database

6.1 Notification of products in the SCIP-database [3]

Based on the Waste Directive EU 2018/851, the aim of the European Chemicals Agency (ECHA) is that products (complex objects), articles and spare parts that contain SVHC substances listed in articles are registered in the central SCIP database of ECHA.

According to the Waste Framework Directive EU 2018/851, all products containing SVHCs above 0.1 percent by mass (mt%) must be reported in the ECHA SCIP database from January 5th, 2021. Specifically, this means that according to the REACH regulation, manufacturers and importers are obliged to check their products for existing substances on the SVHC candidate list.

6.2 Confirmation

DE confirms compliance with the reporting obligation according to the REACH regulation for all products exceeding the percent by mass threshold of 0.1 mt% for all currently listed SVHC substances at the ECHA by entering them in the SCIP database.

DE knows the requirements and will provide the data accordingly if this becomes necessary.

7 Conflict Minerals

7.1 Dodd-Frank Act [6]

"Conflict minerals" are minerals that are mined illegally and outside of state control in the eastern provinces of the Democratic Republic of the Congo (DRC) and neighbouring countries and the financial proceeds of which go directly or indirectly to rebels or militias fighting in civil wars in these countries' areas are involved.

In July 2010, the United States passed legislation (HR4173, better known as the Dodd-Frank Act). This requires listed US companies and their suppliers to ensure that no conflict minerals such as cassiterite (tin), coltan (tantalum), wolframite (tungsten) or gold from the above-mentioned areas of origin enter their supply chain.

7.1.1 Confirmation

We assume that no so-called "conflict minerals" from the Democratic Republic of the Congo or its neighbouring countries are present in our products. Regarding ethical, social and environmental standards, it is our fundamental concern to pay close attention to German, European and international developments.

When using secondary raw materials (scrap), we cannot rule out with absolute certainty that materials, e.g. as alloy components, with a corresponding origin are contained.

Notice:

The details of this information are based on the current knowledge and experience as well as on the status of the legislation on the date of issue.

Please understand that we cannot answer any questionnaires due to the large number of customer-specific questions.

If you have any further questions, please contact the person who is responsible for you at DE.

Dörrenberg Edelstahl GmbH

Engelskirchen, Jun-26

8 Bibliography

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- [4] (RoHS) Richtlinie 2011/65/EU, Beschränkung der Verwendung bestimmter gefährlicher Stoffe in Elektro- und Elektronikgeräten, 2011.
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- [5] EPA „TSCA Chemical Substance Inventory“
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