

Declaration of Compliance Regulation (EC) No. 1907/2006 - REACH

Revision 7.0 of June 30, 2025

Pursuant to Regulation (EC) No. 1907/2006 "REACH" and subsequent amendments and additions, concerning registration, evaluation, authorization and restriction of chemicals, (hereinafter "the Regulation"), we make clear the position of our Company with reference to the following points:

1. Product classification and corporate role in REACH

1.1 According to the definitions of substance, mixture or article, referred to in art. 3 points 1,2,3 of the Regulation, the semi-finished products produced by us, i.e. billets, coils and steel bars, meet the definition of "Article".

1.2 Our company uses substances as such or in mixtures to produce articles and therefore covers the role of "downstream user" as defined by art. 3 point 13 of the Regulation.

2. REACH registration of substances

2.1 The substances in our articles are not intended to be released under normal or reasonably foreseeable conditions of use, so the obligation to register such substances pursuant to Article 7(1) of the Regulation does not apply.

2.2 The raw materials used during the production process, such as scrap metal classified as "end of waste", ferroalloys and cast iron, are purchased from operators with registered offices within the European Union. From them we receive information on the REACH registration or on the possible exemption for recovered substances by applying the conditions set out in Article 2(7)(d) of the Regulation.

2.3 We also consider the exemption under Article 2(7)(d) to apply to the use of scrap metal classified as waste as raw material, subject to the conditions laid down, including pre-registration, for substances subject to the recovery process.

2.4 As a producer of "black waste" we have provided for the REACH registration of the following UVCB substance for by-product qualification:

"EAF-C Electric Furnace Slag" - Registration No. 01-2119485979-09-0065 (30/11/2010).

3. Requirements for SVHC (Substances of Very High Concern)

3.1 SVHC are substances that meet the criteria set out in Article 57, identified under Article 59 of the Regulation.

The "Candidate List" (CL) is a list of SVHCs, candidate substances for inclusion in Annex XIV of the Regulation for the Authorization of a Controlled Use.

The "CL", updated on 25 June 2025, currently contains 250 entries, corresponding to more than 480 substances and is published, in accordance with the Regulation, on the ECHA website (www.echa.europa.eu) on which we operate constant monitoring.

3.2 Whereas:

- from the declarations received from our raw material suppliers, these substances are not present in the substances/mixtures we use for steel production
- they are not intentionally added in the production process
- some of them are present in the articles only in trace amounts, in any case in concentrations not exceeding 0.1% w/w

we can declare that in the steel articles of our production there are no substances of very high concern (SVHCs) in concentration greater than 0.1% w/w.

Both the obligation to report downstream, Art. 33(1), and the obligation to notify ECHA, Art. 7(2)(b), are not applicable.

3.3 The obligation to notify ECHA's SCIP (*Substances of Concern In Products*) database, an extension of art. 33(1) of the REACH Regulation and pursuant to Legislative Decree no. 116/2020 art. 180 paragraph 3 for articles that contain at least one "SVHC in Candidate List" in a concentration greater than 0.1% w/w, is also not applicable.

4. Use Restrictions of certain substances

4.1 Annex XVII of the REACH Regulation lists restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles.

4.2 There is only one substance in the articles we supply, which is listed in Annex XVII for which the following conditions for restriction apply:

- Point no. 27: *Do not use Nickel (Ni) alloy steels (EINECS 231-111-4) for the uses highlighted in Annex XVII (e.g. manufacture of metal objects/articles intended to come into direct and prolonged contact with the skin such as earrings, bracelets, etc.).*

Downstream users of our products are obliged to comply with this restriction.

5. Information along the supply chain

5.1 An active dialogue with our suppliers allows us to receive up-to-date information on the raw materials we use in a short time. The analysis of the work process and the characteristics of the finished product are a constant priority for us to ensure the chemical safety of the product in compliance with the applicable EU legislation.

5.2 With the Product Information Sheets (PISs) of the articles we place on the market, we communicate up-to-date information to downstream users for the safe use of our products.

6. Compliance with REACH Regulation

6.1 For what has been highlighted in the previous points, we can declare our compliance with Regulation (EC) No. 1907/2006 and subsequent amendments and additions, directly applicable in all member countries of the European Union.

This "Declaration of Compliance", relating to the fulfilments prescribed by the European REACH Regulation, is issued under the only responsibility of ORI MARTIN S.p.A.

Brescia, 30 June 2025

ORI MARTIN S.p.A.


Andrea Bonomi
Prevention and Protection Service Manager