

GRUPPO LUCEFIN

The Lucefin Group includes the following companies

ACCIAI BRIANZA Desio (MB)

TRAFILIX Esine (BS)

TRAFILIX Berzo Inferiore (BS)

CO.MET. ACCIAI Brescia

COSMO ACCIAI Spilamberto (MO)

TRAFIL CZECH Kladno, CZ

NUOVA BASSANI Forlì (FC)

SIDERCONERO Osimo Stazione (AN)

SIDERMARCA Ponzano Veneto (TV)

TRA.ME.T. Orbassano (TO)

KSM STAHL Empfingen, D

REGULATION EC 1907/2006 (REACH) AND AMANDEMENT

02/01/2024

Update: Following the verification of new substances incorporated into the Candidate list (SVHC) on Jan 1, 2024, we hereby confirm that the position of the Lucefin Group has not changed from what is stated below.

The companies belonging to the Lucefin Group (hereafter "the Companies") process and distribute products made of steel: in this respect, according to the EC Regulation No. 1907/2006 (REACH Regulation) they qualify as final users, in particular as "users of substances" and "producers of finished goods."

The Companies guarantee that all products distributed comply with the current regulations on environmental safety and on the safeguard of the health of the operators involved.

With reference to EC Regulation 1907/2006 (REACH Regulation), concerning the Registration, Evaluation, Authorization and Restriction of Chemicals, the Companies declare that:

- our products, as articles, cannot be considered substances or compounds and are therefore exempt from the provisions of the REACH Regulation concerning the registration of substances, nor can they be qualified as "articles that intentionally release substances."
- pursuant to Article 33 of the REACH Regulation, as your supplier we are required to report the presence of substances considered to be of "very high concern" (SVHC - Substances of Very High Concern) included in the Candidate List that is periodically updated by ECHA, whenever their concentration in our articles exceeds 0.1% w/w.

Therefore we declare that some of our steel grades contain Lead (a substance included in the SVHC list) in a concentration above 0.1% w/w.

All Companies have:

- notified, via the SCIP portal, the introduction on the market of articles containing Lead with concentration higher than 0.1% w/w.
- made available to final users and distributors a Product Safety Data Sheet containing information about the safe use of our products.

Each individual company's SCIP notification statements and the Product Safety Data Sheet will be provided upon request.

The Lucefin Group is committed to monitoring the periodic review of the Candidate list (SVHC) and to give prompt notice by updating this statement.

Should our position change in the future, we will make sure to keep you informed.

Legal Representative pro tempore