

Vieira de Leiria, 19<sup>th</sup> December 2024.

## PRODUCT DECLARATION

**RoHS Directive 2011/65/EC, ELV Directive 2000/53/EC,  
WEEE Directive 2012/19/EC**

### To our Valued Customers:

Regarding RoHS 2 legislation (Directive 2011/65/EU) on the restriction of the use of certain hazardous substances in electrical and electronic equipment, which became effective on 3 January 2013, the maximum allowed concentrations by weight of lead, mercury, hexavalent chromium, poly-brominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE) for materials that include stainless steels (under point (2) of article 4) has been set at 0.1%. Cadmium is restricted to a 0.01% maximum.

Commission Delegated Directive (EU) 2015/863 (**RoHS 3**) provides an amendment to Annex II of RoHS (2011/65/EU) and confirms the inclusion of four phthalates, Bis(2-ethylhexyl) phthalate (DEHP), Benzyl butyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP), to the list of restricted substances. A maximum concentration value of 0.1% w/w in homogeneous material was specified for the phthalates in the amendment.

Stainless steels do not contain any hexavalent chromium, poly-brominated biphenyls (PBB) polybrominated diphenyl ethers (PBDE) or any of the phthalates mentioned. The minimum 10.5% chromium content in stainless steels is present mainly in the metallic state or, in much smaller quantities, combined with other elements like carbon as carbides or intermetallic compounds. The chromium content of stainless steels is therefore not subject to RoHS restrictions.

In stainless steels only the restrictions to the elements lead, mercury and cadmium are relevant.

Hereupon, we would hereby like to confirm that all steels delivered by Böllinghaus Steel Lda.:

- (1) are free of mercury. In fact, no mercury or mercury containing raw materials are used in any part of the production process;
- (2) do not contain repair welds or welding of any form;
- (3) have no coatings which contain PVC, halogens, phenols or phthalates;
- (4) are not alloyed with cadmium, lead, chromium VI or antimony. The concentration of all these elements is well below the directive's maximum levels (according to the analysis declared on suppliers test certificates).

So, stainless steels produced by Böllinghaus Steel Lda. are expected to comply with these latest RoHS requirements.

Therefore, our products also comply with the End-of-Life vehicles legislation (**Directive 2000/53/EC**, in its latest version) in what concerns to the prohibition of the use of Lead, Mercury, Cadmium or Hexavalent Chromium in materials and components of vehicles put on the market after 1 July 2003.



The European WEEE directive (**Directive 2012/19/EU**) refers to the prevention of waste EEE and the reuse, recycling and other forms of recovery of such wastes, but does not restrict the use of any specific chemicals. This Directive is targeted, mainly, to producers, distributors and consumers and in particular those operators directly involved in the treatment of electrical and electronic equipment waste. Annex VII refers to the removal of certain substances and components from the collection stream, rather than their restriction from use. Therefore, Bollinghaus Steel cannot make any claims with regard to compliance with this directive.

Please do not hesitate to contact us if you have any queries regarding this letter.

Best Regards,

A handwritten signature in blue ink that reads 'Nilza Neto'.

Nilza Neto  
*Sustainability Department*