



The following Compliance Statement pertains to all SPIROL global locations:

## **RoHS/ELV, REACH, Conflict Minerals & MSDS Requirements**

SPIROL recognizes its responsibility as a member of the global community to contribute to the maintenance of a healthy environment. Our goal is to become the industry leader and a model for others in the preservation of the environment.

### **RoHS/ELV**

Directives 2011/65/EU and 2015/863 Restriction of Hazardous Substances (RoHS) of the European Parliament and of the Council of the European Union requires the restriction of the use of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), and polybrominated diphenyl ethers (PBDE) in electrical and electronic equipment.

Directive 2000/53/EC – End of Life Vehicles (ELV) of the European Parliament and of the Council of the European Union requires the restriction of the use of lead, mercury, cadmium and hexavalent chromium.

All aluminium, brass, carbon steel, and stainless steel products manufactured by SPIROL meet the requirements of Directives 2011/65/EU, 2015/863 and 2000/53/EC. SPIROL's manufactured products meet the exemption criteria for lead based on:

- Steel, stainless steel and steel alloy products contain less than 0.35 percent lead by weight.
- Aluminum products contain less than 0.4 percent lead by weight.
- Brass products contain less than 4 percent lead by weight.

When used in applications where environmental and safety beneficial substitutions are technically or scientifically impractical, SPIROL can provide customer specific finishes which do not conform to either of these two European directives.

### **REACH**

In regard to Directive 1907/2006 EC Registration, Evaluation, Authorization and Restriction of Chemical substances of the European Parliament and of the Council of the European Union, SPIROL is not required to register, however; the suppliers of raw materials for SPIROL products are registered.

SPIROL's products do not exceed limits of any of the Substances of Very High Concern (SVHC) as defined in Article 57, Annex XIV, Annex XVII with current amendments. Although trace amounts of Lead (CAS# 7439-92-1) may exceed 0.05% by weight in Carbon Steels, the limit does not apply due to the rate of release will be less 0.05 µg/cm<sup>2</sup> which meets the conditions of restriction for lead per Annex XVII, entry 63.

Please refer to Appendix B for SPIROL REACH Quality contact information.



## CONFLICT MINERALS

SPIROL shares concerns of our Global Community to prevent profiting from metals mining ("conflict materials") countries that may be fueling human rights atrocities in the Democratic Republic of the Congo (DRC) or adjoining countries.

SPIROL does not use "Conflict Minerals"<sup>1</sup> in the manufacture of our products. SPIROL's products manufactured from aluminum, brass, carbon steel, and stainless steels are not sourced from "DRC Countries"<sup>2</sup>.

In July 2010, the United States enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act") which contained a section that regulated "Conflict Minerals"<sup>1</sup>. The Act includes provisions that require manufacturers to perform due diligence in their supply chains to identify and disclose the use of any Conflict Minerals and whether those Conflict Minerals originated in the "DRC Countries"<sup>2</sup>.

SPIROL is compliant with the Act and other requirements concerning the sourcing of our raw materials from conflict areas. SPIROL also expects suppliers to comply with our Code of Conduct.

<sup>1</sup> "Conflict Minerals" include columbite-tantalite (coltan), cassiterite, gold, wolframite, tantalum, tin, tungsten, and any derivatives from these minerals.

<sup>2</sup> "DRC Countries" include the Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, The Republic of Congo, Uganda, Rwanda, Sudan (South Sudan), Tanzania, and Zambia.

## MSDS REQUIREMENTS

According to the Occupational Safety and Health Administration Hazard Communication Standard, SPIROL products meet the definition of "article" and do not require a material safety data sheet.

1910.1200(b)(6)(iv)

"Article" means a manufactured item: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which does not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use.

For more information on RoHS, REACH, Conflict Minerals or MSDS Requirements, contact the Quality Assurance Department at your local SPIROL facility. (Reference Appendix B)

Sincerely,

*Ian Martin*

Ian Martin  
Chairman - SPIROL Global Quality Council

**APPENDIX A**

## Global Locations

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**APPENDIX B**

## SPIROL Quality Contact Information:

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