Cromatura Moderna S.R.L.

CROMATURA MODERNA S.r.l.
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REACH and RoHS Compliance Statement

Regulation (EC) No 1907/2006 (REACH) — Directive 2011/65/EU as amended (RoHS)

Document REACH-RoHS • **Revision** 01 **Date of issue** 23 September 2026

1. SCOPE

Cromatura Moderna S.r.l. carries out surface treatments **exclusively on a subcontract (toll-processing) basis**, on parts owned by the Customer. This statement is issued by the Company and applies to **all production sites** operated by it.

The treatments performed include anodic oxidation of aluminium with optional colouring, conversion coating, pickling and degreasing of aluminium, electrolytic tin plating and nickel-tin alloy plating.

> All of the Company's production cycles are **free from hexavalent chromium**. Conversion coating is carried out exclusively with trivalent chromium based formulations.

2. REACH REGULATION

The Company acts as a **downstream user** within the meaning of Article 3(13) of the Regulation: it neither manufactures nor imports chemical substances, and sources exclusively from suppliers established in the European Union.

On the basis of the Safety Data Sheets of the chemical products used, the Company declares that:

- no treatment involves substances included in **Annex XIV** (Authorisation List);
- the products used and the treatments performed comply with the restrictions set out in **Annex XVII**;
- the surface layers applied contain no **Substances of Very High Concern (SVHC)** in a concentration above **0.1% by weight (w/w)**, with reference to the ECHA Candidate List as updated on 4 February 2026.

The Company monitors the periodic updates of the Candidate List and issues a new revision of this document where necessary.

3. ROHS DIRECTIVE

The treatments covered by this statement **do not involve the addition** of the substances listed in Annex II to Directive 2011/65/EU, as amended by Commission Delegated Directive (EU) 2015/863. On the basis of the Safety Data Sheets of the chemical products used, those substances are not present in the surface layers applied in concentrations exceeding the maximum values tolerated in homogeneous materials.

Substances and maximum concentration values tolerated in homogeneous materials, by weight (w/w):
lead (Pb) **0.1%** • mercury (Hg) **0.1%** • cadmium (Cd) **0.01%** • hexavalent chromium (Cr VI) **0.1%** • polybrominated biphenyls (PBB) **0.1%** • polybrominated diphenyl ethers (PBDE) **0.1%** • DEHP **0.1%** • BBP **0.1%** • DBP **0.1%** • DIBP **0.1%**

4. LIMITATIONS OF THIS STATEMENT

- The Company is not a manufacturer, importer or distributor of electrical and electronic equipment: the compliance obligations under Directive 2011/65/EU remain with the party placing the finished product on the market.
- Operating on a subcontract basis, the Company has no knowledge of and no control over the composition of the base material supplied by the Customer. This statement refers **exclusively to the surface layers generated by the treatments performed** and does not cover the substrate, pre-existing coatings or processing carried out by third parties.
- The statements contained in this document are based on the technical documentation and Safety Data Sheets made available by suppliers, as well as on direct knowledge of the production cycles; they do not constitute the result of analytical testing on the applied coatings. Specific testing may be agreed with the Customer.

The supporting documentation is retained by the Company within its quality management system and is made available upon reasoned request by the Customer.

5. VALIDITY

This statement is valid **until superseded by a new revision**. The Company undertakes to issue an updated document in the event of changes to its production cycles, to the chemical products used or to the applicable regulatory framework.

San Giorgio su Legnano, 23 September 2026