



ARTROM STEEL TUBES S.A.

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Subscribed and Paid Share Capital: 291.587.538,34 lei

Dear customer,

The European Regulation (EC1907/2006) concerning Registration, Evaluation, Authorization and Restriction on Chemicals (REACH) requires substances on their own, in preparation, or substances intentionally released from article, which are manufactured or imported into the EU in quantity above 1 ton per year per manufacturer/importer to be registered.

REACH establishes specific duties and obligations for businesses in the European Union (EU), which manufacture or import substances or articles that include a "substance of very high concern" (SVHC) in concentration exceeding 0.1% w/w, with the aim to identify their hazardous properties and recommend applying corresponding risk management measures along the supply chain.

ARTROM STEEL TUBES S.A is fully aware of the European Regulation, which replaces numerous EU laws related to chemicals and other environmental and safety legislation and is using its best effort to comply with it. Our company has followed the evolution and implementation of the REACH regulation since the very beginning and has constantly monitored the safety of the chemicals used in its processes with the reference to human health and environment.

- According to REACH criteria, our steel products (billets and tubes) fall under the definition of "Article" as specified in the Regulation.

Conclusion was issued based on the ECHA (European Chemical Agency) interpretation of "guidance on the requirements for substances in article "under REACH.

EUROFER (European Steel Association), an association our company is part of ,also concludes that steel products are an "article" ,which is not intended to release substances, according to guidance on requirements for substances in article (rip 3.8). For the reasons above mentioned, we have no obligation to register our products under REACH. Our products are not subject to classification under CLP regulation (REGULATION EC No 1272/ 2008).

- Under REACH, companies have legal obligations to report when their substance is included – either on its own, in mixtures or in articles – in the Candidate List. On 25 June 2025 ECHA has added 3 more chemical to the Candidate List because of their hazardous properties. The Candidate List of substances of very high concern now contains 250 entries for chemicals that can harm people or the environment.

According to REACH ,suppliers of articles containing a Candidate List substance above a concentration of 0.1 % (weight by weight) have to give their customers and consumers information to be able to use them safely.

Please note that the steel tubes /billets produced by our company contain no" Substances of Very High Concern "with concentration exceeding 0,1 % w/w from the Current SVHC Candidate List.

We are constantly monitoring the Candidate list of SVHC's and we will inform you in case of inclusion of a substance contained in our steel products, as foreseen in the Reach Regulation. For more information and details we recommend to see "ECHA 's Guidance on article " and "Eurofer position paper" available on ECHA and EUROFER web sites.

As "downstream- user" (of various substances in our activity), ARTROM STEEL TUBES applies the risk management evaluation regarding SVHC9 (Substance of very high concern) and collects continuously information from its suppliers and its supply chain, communicating them to the "Safety Data Sheet" (SDS). We do not anticipate any significant change to be introduced by REACH, but we will inform you in case of any changes taking place as soon as possible. For any additional information please feel free to contact us by e-mail to:

office@artrom.com (to the attention of Mrs. Magdalena Popescu) or to magdalena.popescu@artrom.com

Yours faithfully,

Director of Quality, Environmental & Integrated Management System

Magdalena Popescu

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LRQA:
ISO 9001
ISO 14001
ISO 45001

LRQA:
IATF 16949

TUV:
PED/AD-2000 W0/W4
Vd TUV

TUV CPR:
EN 10210-1,2
EN 10255

DNV
RINA
LR