Zapp Precision Metals (Sweden) AB, 811 34 Sandviken

RDO Springs

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Zapp Precision Metals (Sweden) AB

PRECISION WIRE Järnverksleden 18 811 34 Sandviken

Sweden

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General Manager: Pär Berglund Registered office: Sandviken VAT-No.: SE559146528001 Organization No.: 559146-5280

Member of the Zapp Group

2021-01-22

Declaration regarding REACH and RoHS

Dear Sir or Madam,

We would like to make the following statement with reference to your inquiry.

RoHS:

For technical reasons, carrying over of undesirable elements (such as for example heavy metals) cannot always be prevented during production of stainless steels, particularly during the melting process. To our knowledge, the content of these elements in our products does not exceed 10ppm. On average, the proportions are considerably lower. For this reason, our stainless steels are designated as free from hazardous substances. Alloys which intentionally contain such elements at the customer's request are obviously excluded from this.

We would be pleased to supply you with more information with reference to specific material grades and qualities on request.

The metal Chromium does not exist in stainless steels as toxic six-valence Chromium. Though stainless steels normally include more than 10% of Chromium, all of them are in metallic form and therefore, valence of Chromium in stainless steels is zero. From thermo-dynamic reason, six-valence Chromium cannot be generated themselves in stainless steels. Thus, stainless steels are actually free from six-valence Chromium.

2011/65/EU (RoHS)

All materials supplied by Zapp Precision Metals (Sweden) AB are in accordance with above regulations.

REACH:

Statement on "substances of very high concern" (SVHC) according to the Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), published on the 30th December 2006 in the Official Journal of the European Union 396/1.

Dear Sir or Madam,

We thank you for your request to **Zapp Precision Metals (Sweden) AB** regarding our information requirements for "Substances of Very High Concern" ("SVHC"; Candidate List of Substances of Very High Concern for authorisation) in our articles according to Article 33 of the REACH-Regulation (EC) No 1907/2006 (REACH).

As "downstream user" and as "supplier of an article" under REACH we are forced to pass on information along the supply chain. Unfortunately it is unclear to many companies what these information requirements actually mean. This often results in situations where companies along the supply chain urge each other to confirm "REACH compliance" of articles. Such statements are not intended by REACH. For companies they only cause additional expenses, but generate neither legal certainty nor other real benefit. Therefore we would like to inform you what information you will receive from us as "supplier of an article" in accordance with the requirements of REACH.

Information requirements according to Article 33

The products we supply are legally defined as articles¹.

According to Article 33(1) REACH, any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.

If such cases occur we will properly comply with the information requirements in order to ensure the safe handling of our high quality articles.

Furthermore, we are in close contact with our suppliers. On the basis of our risk assessment there are no indications which will lead to a specific sample analysis up to now. According to the information available we currently assume that our articles do not contain any SVHC in a concentration above 0,1% weight by weight (w/w). Once we have further information we will inform you immediately and coordinate appropriate measures. Due to our broad range of articles and due to the fact that we are depending on the information coming from our suppliers, who also have to fulfil the information requirements, you will certainly understand that we are not able to give further legally binding statements.

¹ Art. 3 no. 3 REACH: article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition

REACH implementation in our company

The expert group "Environment and occupational safety" of WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. regularly informs us about proposed substances for the Candidate List, public consultations, new SVHC on the Candidate List² and about the relevance of SVHC.

The published information on uses of SVHC show that the products supplied do not contain any of these substances.³

http://echa.europa.eu/candidate-list-table and
http://www.reach-clp-biozid-helpdesk.de/de/REACH/Kandidatenliste/Kandidatenliste.html
http://echa.europa.eu/web/guest/information-on-chemicals/candidate-list-substances-in-articles-table

By sending you this information letter to fulfil our information requirements as a "supplier of an article" according to Article 33(1) REACH we are following legal provisions and recommendations of WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V.

This statement applies only to the article / articles supplied by us. Modifications of the article / articles within the processing are thereby not covered.

Your contact in our company is Basid Azizi, Tel: +46 26 26 3988

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Dear Customer / distributor

As earlier communicated, Zapp is acquiring Sandvik's global stainless wire business. The official closing of the deal is planned to take place on 31 August 2018.

The Sandvik stainless wire management team and staff will be transferred to Zapp on the day of closing. They are all dedicated to maintaining a strong relationship with you. Sandvik and Zapp have also developed extensive and exclusive supply agreements, which means that the full Sandvik Stainless Wire product range will be accessible through Zapp from the day of closing.

Your orders will be handled as usual in our current manufacturing unit with agreed supply and quality commitments. All open orders will be transferred to Zapp at closing and honored in terms of price, delivery and other conditions. You can rely on us to remain your trusted business partner – who will provide persistent focus on product quality, associated services and on-time delivery. Under new ownership, you can expect continued confidence in delivery of the highest value solutions and services that you have come to expect.

We look forward to continuing our successful collaboration with you.

Please find enclosed an overview over the most important changes regarding the general company information. I kindly ask you to use this information and to share it with those in your company that will need it. If you wish to discuss this matter in more detail, please do not hesitate to contact me.

Best regards,

Pai Berglund

Pär Berglund

Managing Director Sandviken Specialty Wire AB (under name change to) Managing Director Zapp Precision Metals (Sweden) AB

Phone +46 70 23 92-437

par.berglund@sandvik.com

paer.berglund@zapp.com (valid from 01 September 2018)

GENERAL INFORMATION

NEW COMPANY NAME

Zapp Precision Metals (Sweden) AB (name changes from: Sandviken Specialty Wire AB)

COMPANY ADDRESS

Zapp Precision Metals (Sweden) AB Järnverksleden 8 811 34 Sandviken Sweden

ORGANIZATION NUMBER/ VAT

Organization number: 559146-5280 VAT-number: SE55914628001