



Registration, Evaluation and Authorization of Chemicals (REACH) Policy

Policy-27

Rev 00

Rev Date: 06-10-2023

Policy Statement

REACH (Regulation EC 1907/2006) is the European Community Regulation on chemicals and their safe use; it deals with the Registration, Evaluation, Authorization and Restriction of Chemical substances.

The law entered into force on 1 June 2007 with the specific aim of improving the protection of human health and the environment. It places greater responsibility on industry to manage the risks from chemicals and to provide safety information on the substances.

Manufacturers and importers are required to gather information on the properties of their chemical substances, which will allow their safe handling, and to register the information in a central database run by the European Chemicals Agency (ECHA).

Notification of the substance and product is required when all the following conditions are met:

- The substance is included in the Candidate list.
- The substance is present in articles produced and / or imported at a concentration of above 0.1% (w/w).
- The total amount of the substance presents in all articles produced and / or imported, which contain more than 0.1% (w/w) of the substance, exceeds 1 ton per year for the producer / importer.

Scope

This applies to the material procured by the company from the direct and indirect suppliers.

Commitment

The Company hereby confirms that our products currently do not contain SVHC substances more than 0.1% weight by weight (w/w).

The Company intends to comply with the requirements of the REACH and expect our suppliers to do the same. Therefore, we are committed to:

- Not buying products and materials containing SVHC substances more than 0.1% weight by weight.
- Asking our suppliers to work towards ensuring that no more than 0.1% (w/w) of SVHC substance contained in the products and materials supplied to the Company.
- Engaging with our customers regarding their disclosure obligations.
- the principles of REACH and as part of our on-going duty of care shall continue to monitor all products manufactured and imported/Export by ourselves ensuring compliance with EC regulation 1907/2006 and subsequent amendments.

The declaration will be given as per the customer requirement as evidence of our commitment to REACH compliance.

Guideline

To ensure on-going legal compliance with regulation EC 1907/2006 and subsequent amendments Company shall:



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- Monitor the candidate list of substances of very high concern (SVHC) to ensure that additions to the list are evaluated with respect to our products (when the SVHC is updated / six monthly). The SVHC list can be accessed at <http://echa.europa.eu/web/guest/candidate-list-table> .
- During new supplier evaluation and selection process, the supplier shall conform to comply with the REACH requirements.
- During annual supplier audit, the auditor must verify the compliance of the REACH requirement.
- The company shall ensure & monitor the receiving of declaration and testing reports of the material substances from the direct / indirect suppliers on annual basis.
- Work closely throughout the supply chain with suppliers to ensure all potential risks associated with chemicals used in the manufacture of our products are evaluated, monitored, and recorded.
- Provide customers with information regarding hazards, risks, and safe conditions of use of our products through product composition / material safety data sheets (MSDS), whenever required.

Corrective Action

- The company shall be involved in supply chain and continue to work with all our suppliers to ensure that we are able to identify the use of SVHC substances in our supply chain, and grateful to pass the information to the customers about the SVHC substance status of the parts we manufacture and probably involved in someone's due diligence.
- The company shall address the requirements in the Purchase Agreement as well as in the purchasing terms and conditions.

The following information links may be helpful in the short term:

1. What is REACH?
<http://echa.europa.eu/web/guest/regulations/reach/understanding-reach>
2. REACH Directive
<http://eurlex.europa.eu/legalcontent/EN/TXT/PDF/?uri=CELEX:32006R1907&from=EN>
3. REACH Guidance Document for Downstream Users
<http://echa.europa.eu/web/guest/regulations/reach/downstream-users>
4. ECHA SVHC List (Updated June 25, 2020)
http://echa.europa.eu/chem_data/candidate_list_table_en.asp