

GRUPPO LUCEFIN

The Lucefin Group
includes
the following
companies:

ACCIAI BRIANZA Desio (MB)
TRAFILIX Esine (BS)
TRAFILIX Berzo Inferiore (BS)
CO.MET. ACCIAI Brescia
COSMO ACCIAI Spilamberto (MO)
TRAFIL CZECH Kladno, CZ
NUOVA BASSANI Forlì (FC)
SIDERCONERO Osimo Stazione (AN)
SIDERMARCA Ponzano Veneto (TV)
TRA.ME.T. Orbassano (TO)
KSM STAHL Empfingen, D

DIRECTIVE EC 95/2002 ROHS AS AMENDED

02/01/2024

UPDATE: Following the amendments to Annex IV of the Legislative Decree No. 27 of March 4, 2014 on the restriction of certain hazardous substances in electrical and electronic equipment, introduced by Decree on Dec. 14, 2023 for the implementation of the Delegated Directives of the Commission (EU) 2023/1437 and (EU) 2023/1526, we hereby confirm that the position of the Lucefin Group has not changed from what is stated below.

The Directive 2002/95/EC and subsequent amendments and addendum, 2011/65/EU and 2015/863/EU, set restrictions on the use of hazardous substances in electrical and electronic equipment (EEE) by defining concentration limits for the following substances in homogeneous materials:

- lead (0,1%)
- mercury (0,1%)
- cadmium (0,01%)
- hexavalent chromium (0,1%)
- poly-brominated biphenyls (PBBP) (0,1%)
- poly-brominated di-phenyl ethers (PBDE) (0,1%)
- bis(2-ethylhexyl) phthalate (DEHP) (0,1 %)
- butyl benzyl phthalate (BBP) (0,1 %)
- dibutyl phthalate (DBP) (0,1 %)
- diisobutyl phthalate (DIBP) (0,1 %)

The products sold by the Lucefin Group companies (bright finished steel bars, hot rolled bars, forged bars, steel tubes) can be considered homogeneous, whose definition given by the article 3 of the Directive RoHS-II is the following: "Homogeneous material" is a material with a uniform composition or a material obtained thanks to the combination of more than one component which cannot be split in different materials through mechanical actions like unscrewing, cutting, crushing, grinding and abrasive processes.

The steels processed and distributed by Lucefin Group companies comply with the limits set by the regulations except for some steel grades in which the concentration of Lead exceeds the set limit. However, with the DELEGATED DIRECTIVE (EU) 2018/739 of March 1, 2018, amending Annex III of Directive 2011/65/EC, we make use of the exemption (6a) regarding the use of lead as an alloying element in steel" which allows the use of lead concentrations above 0.1% as follows:

- Lead as an alloy in steel for mechanical processing and galvanized steel containing up to 0,35% of lead in weight
- Lead as alloy in aluminum containing up to 0,4% of lead in weight
- Copper alloys containing up to 4% of lead in weight.

This exemption, which expired in July 2021, is still valid and is awaiting the opinion on the extension proposal submitted by the parties concerned to the relevant Commission.

Legal Representative pro tempore