

GRUPPO LUCEFIN

The Lucefin Group includes the following companies

TRAFILIX S.p.A.
Esine production unit
Esine (BS)

TRAFILIX S.p.A.
Berzo production unit
Berzo Inferiore (BS)

TRAFILIX S.p.A.
Distribution center
Cividate Camuno (BS)

TRAFIL CZECH S.r.o. Kladno, CZ

ACCIAI BRIANZA S.p.A. Desio (MB)

ACCIAI BRIANZA S.p.A.
commercial division:
TRA.ME.T. Orbassano (TO)

CO.MET. ACCIAI s.r.l. Brescia

CO.MET. ACCIAI s.r.l.
commercial division:
SIDERCONERO Osimo Stazione (AN)

COSMO ACCIAI s.r.l. Spilamberto (MO)

NUOVA BASSANI s.r.l. Forlì (FC)

SIDERMARCA s.r.l. Ponzano Veneto (TV)

KSM STAHL GmbH Empfingen, D

REGULATION EC 1907/2006 (REACH) AND AMANDEMENT

07/25/2025

Update: The list of candidate substances of very high concern (SVHC) was updated on 06/25/2025. The Lucefin Group's position has not changed from what is stated below.

The companies belonging to the Lucefin Group (hereafter "the Companies") process and distribute products made of steel: in this respect, according to the EC Regulation No. 1907/2006 (REACH Regulation) they qualify as final users, in particular as "users of substances" and "producers of finished goods."

The Companies guarantee that all products distributed comply with the current regulations on environmental safety and on the safeguard of the health of the operators involved.

With reference to EC Regulation 1907/2006 (REACH Regulation), concerning the Registration, Evaluation, Authorization and Restriction of Chemicals, the Companies declare that:

- our products, as articles, cannot be considered substances or compounds and are therefore exempt from the provisions of the REACH Regulation concerning the registration of substances, nor can they be qualified as "articles that intentionally release substances."
- pursuant to Article 33 of the REACH Regulation, as your supplier we are required to report the presence of substances considered to be of "very high concern" (SVHC - Substances of Very High Concern) included in the Candidate List that is periodically updated by ECHA, whenever their concentration in our articles exceeds 0.1% w/w.

Therefore we declare that some of our steel grades contain Lead (a substance included in the SVHC list) in a concentration above 0.1% w/w.

These steels can be recognized by the presence of the element Pb in their description.

Therefore, all companies have notified, through SCIP portal, the placing on the market of articles containing Lead with concentrations above 0.1% w/w.

SCIP notification statements from individual companies will be provided upon request.

The following are some measures for the safe use of steels, particularly those containing hazardous substances, such as Lead, with the aim of providing basic information to raise awareness of the reduction of exposure, worker protection, and the adoption of procedures for greater safeguarding and environmental protection.

These are indicative and not exhaustive measures that must be evaluated and integrated according to the work and environmental conditions in which they are performed.

The Lucefin Group is committed to monitoring the periodic review of the Candidate list (SVHC) and to give prompt notice by updating this statement.

Should our position change in the future, we will make sure to keep you informed.

Legal Representative pro tempore

GRUPPO LUCEFIN

SAFETY MEASURES FOR THE USE OF STEELS (ESPECIALLY FOR THOSE CONTAINING HAZARDOUS SUBSTANCES SUCH AS LEAD):

Individual protection
to be defined according
to the type of work
performed:

PROTECTIVE CLOTHING: Use work clothing that covers the skin, preferably made of materials that do not shed fibers.

GLOVES: Wear cut- and abrasion-resistant gloves suitable for contact with metals.

MASK: Use a mask with a dust and particulate filter, especially during cutting or grinding operations that generate dust.

SAFETY GLASSES: Wear safety glasses to protect eyes from chips or particles.

Waste Management:

COLLECTION AND DISPOSAL: Collect offcuts, dust and scraps in closed, dedicated containers. Follow local regulations for disposal of lead-containing waste, which often requires specific treatment.

AVOID DISPERSAL: Do not disperse material into the environment, especially do not disperse dust or scraps into water or soil.

Work environment:

VENTILATION: Ensure good ventilation in the work area, possibly with localized suction, to remove dusts and vapors that may be generated during work.

CLEANING: Keep the work area clean, using suitable vacuum cleaners to remove dust and debris. Avoid dry sweeping, as this promotes dust dispersion.

CANTEEN: Do not consume food or beverages in the work area and remove protective clothing before entering eating areas.

Specific work:

CUTTING AND GRINDING: During cutting and grinding operations, wear appropriate personal protective equipment and ensure effective dust extraction.

WELDING: Pay special attention to welding operations, particularly with leaded steels as toxic vapors may be released. Ensure good ventilation and, if necessary, use masks with specific vapor filters.

Training:

Ensure that personnel working with steels (particularly those containing Pb) are properly trained in safety procedures and risk management.