

## RoHS and REACH Compliance Declaration

July 2021

BBA @raaco.com

raaco A/S provides high quality brand storage solutions, that meet environmental regulations, including EU Directive 2002/95/EC and subsequent amendments of the European Parliament and of the Council for the use of certain hazardous substances in electrical and electronic equipment (EEE) and REACH (Registration, Authorisation and Restriction of Chemicals, European Union Regulation (EC 1907/2006)).

We are providing you with the following information to assist you in meeting your environmental policies and procedures.

### RoHS compliance

All raaco A/S products are compliant with the RoHS Directive - EU Directive 2002/95/EC and subsequent amendments, with latest Directive 2015/863/EU from March 31.2015, which means that the following substances are not contained in a finished product above threshold limits stated below unless the restrictive substance is subject of an exemption contained in the RoHS Directive.

raaco A/S maintain effective dialogue with our Suppliers to assure continuous compliance with the above registration.

Restricted substance	Maximum threshold limit
Cadmium and its compounds	100 ppm (0,01 weight %)
Mercury and its compounds	1000 ppm (0,1 weight %)
Hexavalent chromium and its compounds	1000 ppm (0,1 weight %)
Lead and its compound *	1000 ppm (0,1 weight %)
Polybrominated biphenyls (PBB)	1000 ppm (0,1 weight %)
Polybrominated diphenyl ethers (PBDE)	1000 ppm (0,1 weight %)
Bis(2-Ethylhexyl) phthalate (DEHP)	1000 ppm (0,1 weight %) – added 2015
Benzyl butyl phthalate (BBP)	1000 ppm (0,1 weight %) – added 2015
Dibutyl phthalate (DBP)	1000 ppm (0,1 weight %) – added 2015
Diisobutyl phthalate (DIBP)	1000 ppm (0,1 weight %) – added 2015

\* Except when allowed by the Directive, for example, 3500 ppm in steel, 4000 ppm in aluminium alloys and 40000 ppm in copper alloys.

The compliance of raaco A/S products with RoHS is affected through:

- Strictly controlling the materials and finishes that are used in our products.
- Periodic audits of our suppliers to ensure compliance.
- Periodic analysis, on an as-needed basis, of our products.

## REACH compliance

Based on information obtained from our Suppliers, raaco A/S certify that none of the materials used for manufacturing of our products, contain any Substances of Very High Concern (SVHC), as listed by the European Chemicals Agency (ECHA) under the provisions of Regulation (EC) 1907/2006 of the European Parliament, and all subsequent amendments, including the latest REACH SVHC Candidate List update from 08<sup>th</sup> of July 2021.

Please see the list on: <http://echa.europa.eu/candidate-list-table> for more detailed information.

- Under the structure of the REACH regulation, raaco A/S is the manufacturer of the “articles” – we do not manufacture “substances” or “preparations”, our “articles” do not involve the “intentional release of substances”. Accordingly, we foresee no registration or pre-registration or Authorization requirement for the products we supply.
- Regarding requirements of Article 33 of REACH: Duty to communicate information on substances in articles – we declare that none of the of the SVHCs - currently released by ECHA (08<sup>th</sup> of July 2021) – currently 219 entries, is present in raaco A/S products, including packaging, in quantities totaling in a concentration equal or above 0,1%.
- Regarding requirement of Article 67 of REACH: A substance on its own, in a preparation or in the article, restricted by Annex XVII – Restricted Substances List (last update on 04<sup>th</sup> of June 2021 – 69 unique entries), shall not be manufactured, placed on the market or used, unless it complies with the condition of that restriction. We declare that none of the substances from Restricted Substances List is present in our products and packaging materials.
- As stated above, the products we manufacture, including the packaging are not under obligation to register in SCIP database according to Waste Framework Directive from 05<sup>th</sup> of January 2021.

raaco A/S as downstream user, will continuously review the ECHA SVHC Candidate List, as well as REACH Annex XVII – Restricted Substances List and REACH Annex XIV – Authorisation List for additions and updates.

raaco A/S will act accordingly in compliance with REACH regulations including maintaining dialogue with Suppliers to assure their compliance.

## Halogen free Compliance Declaration

We hereby declare that our products are compliant with Halogen free requirements (Br <900 ppm, Cl<900 ppm and Br+Cl <1500 ppm).

Yours faithfully

raaco A/S



Beata Basiak

QHSE Coordinator for raaco A/S