

Verona, 2025 January 29th

SUBJECT : 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**), establishing a European Chemicals Agency, amending Directive nr. 1999/45/EC and repealing Council Regulation (EEC) nr. 793/93 and Commission Regulation (EC) nr. 1488/94 as well as Council Directive nr. 76/769/EEC and Commission Directives nr. 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

REFERENCE : Status and Role of FEDRIGONI SpA - Verona Italy / 35th Update on 21.01.2025

Regarding Company's standing with reference to European Regulation nr. 1907/2006 (R.E.A.CH.), presently, as soon as we are classified as "downstream users" of chemicals and, at the same time, as manufacturer of "articles", we have already performed the duties as established by articles nr. 7 - 37 - 38 of the regulation in teamwork with our chemical's suppliers.

It means we're no chemicals manufacturer, trader or importer, then we don't have to submit to registration our papers since this product is classified as article by the same regulation (see Article nr. 3 / Paragraph 3 of Regulation EC where is showed the definition of 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").

Collaterally to this introductory, since we're only producer of articles, in accordance with article nr. 7 (Registration and notification of substances in articles) we don't meet in our processes conditions where the substances not registered (or pre-registered) are present in quantities totalling over 1 tonne per producer or importer per year or the substance is intended to be released under normal or reasonably foreseeable conditions of use. Therefore, we shall not submit a registration to the Agency for these.

Anyway, we have already performed our duties appointed by articles nr. 37 and nr. 38 of Regulation EC, providing to all our chemical's suppliers (manufacturers and importers) a full description of use their substances on our own processes with the aim of making for these an identified use and to prepare an exposure scenario or, if appropriate, an employment and exposure category for his use.

Afterwards, when the new technical and safety sheet will be published by requirements of this Regulation EC (or rather within 2010 December 1st at the most), we shall respect the whole limitations (identified use and exposure scenario) will be included into it for each chemical product we shall utilize.

At last, in papers (articles) we produce and sell you, are not present SVHC substances (Substances of Very High Concern for authorization), as described on candidate list **updated on 2025, January 21st**.

The list of these substances updated is accessible on the ECHA (European Chemical Agency) website or via this internet link:

<http://echa.europa.eu/it/candidate-list-table>

For more information about the effects of these substances you can refer to the previous web site, too.

FEDRIGONI SpA

HSE and Quality Manager - Special Papers

Valentina Marino ¹

¹ This document has been drawn up electronically and is valid as well without an original signature. Signature replaced in accordance with Art. no.3 / Paragraph 2 of Italian Legislative Decree no. 39/93

