

Declaration of Conformity in accordance with the REACH regulation

Declaration concerning Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

As manufacturers and sellers of fastening materials, we at GREMAKO GmbH & Co. KG are only affected in our position as a downstream user or as "Products supplier".

General Obligation to Register acc. to Art. 6, 7 (1):

Registration obligations that arise on the basis of the manufacture and market introduction of substances and chemicals do not apply to us.

The products that we deliver to you are classified as articles and are therefore not defined as substances or preparations (as per Article 3 Definitions of the REACH regulation).

According to Art. 7(1) it is only necessary to register substances if they contain relevant chemicals that are also likely to be released. In the case of products that are treated with corrosion protection, substances may be released that have been registered by our suppliers. Our suppliers have provided us with the appropriate confirmations in this regard.

Duty to inform acc. to Art. 33:

Our fastening materials manufactured from C60Pb or 11SMnPb30 contain up to 0.35% **lead** (substance of very high concern, SVHC).

Other substances on the candidate list are not included in our products.

Changes in the candidate list will be reviewed.

Where necessary, we will inform you of any relevant changes made to your products on the basis of REACH, any changes to our ability to supply those products and any changes to the quality of the parts that we supply you with within the scope of our business relationship, and we will agree appropriate measures with you on a case-by-case basis.

As a downstream user, we will comply with all of the requirements imposed on us by the REACH regulation.

SCIP Notification acc. to § 16f) ChemG

We have notified the SCIP database for the following product groups:

Turned parts made of leaded free-cutting steel (11SMnPb30) with thread:

91fb1176-95e3-4886-8942-83fc947faeea

Turned parts made of leaded free-cutting steel (11SMnPb30) without thread:

b1dc7b92-d8db-41ae-9ab5-860a330a39c2

Turned parts made of leaded quenched and tempered steel (C60Pb) with thread:

e65f42cb-d691-4fa9-abc4-0b3d96747dd3

Turned parts made of leaded quenched and tempered steel (C60Pb) without thread:

080a8570-ddf8-4730-a4df-8ea187c7e598

RoHS Declaration of Conformity

GREMAKO GmbH & Co. KG hereby confirms that the products we supply conform to the requirements of EU Directive 2011/65/EU (RoHS). This Directive incorporates Directive 2015/863 (RoHS 3).

The materials used do not contain any of the hazardous substances listed, or such hazardous substances are only present in the raw material as an alloying element within the permitted limits.

In particular, this relates to the following RoHS-relevant substances and materials:

Lead (Pb) max. 0.35% (RoHS Directive 2011/65/EU, Annex III, paragraph 6a Exemptions)

Conflict Minerals

Minerals Regulation (EU) 2017/821. In accordance with this regulation, we do not process any of the minerals defined therein and are therefore not obligated to provide corresponding documentation.

The requirements of the Dodd-Frank Act Section 1502 cannot be fully confirmed. Products made from 1.4305, 1.4401, and other stainless steels, as well as certain surface coatings, contain nickel. As of April 2025, nickel is listed as a critical mineral in the Extended Minerals Reporting Template (EMRT).

We emphasize that we source raw materials exclusively from long-standing, trusted suppliers located in the European Union and Switzerland. However, as a processor of steel, we have no direct influence over the origin of minerals used by our suppliers and their sub-suppliers. Therefore, we cannot provide any guarantees in this regard.

Our company is aware of its social responsibility regarding environmental protection, safety, health, and human rights. We acknowledge that our business conduct has an impact on both society and the environment. In order to promote the peaceful, fair, and sustainable use of global resources, we confirm that we do not engage in direct imports of minerals or so-called "conflict minerals." We advocate for traceability and transparency in the products supplied by our vendors. Should we become aware of the use of such minerals, we will immediately take countermeasures and initiate the replacement of these materials.

TSCA (Toxic Substances Control Act)

Our products do not contain any substances mentioned in section 6 of TSCA Toxic Substances Control Act.

General Note

To the best of our current knowledge, the products supplied by GREMAKO GmbH & Co. KG comply with the above-mentioned requirements. We are in contact with our suppliers to ensure and verify their compliance accordingly.

These statements do not constitute a guarantee in the legal sense of warranty law.