



**DELL'ERA ERMANN
E FIGLIO SRL**

COLD FORMING STANDARD AND SPECIAL METRIC SCREWS

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Mecc. LC 003932
R.E.A. LC 43012
C.F. / P.I. IT 00076670132
Cap. Soc. Euro. 104,000 i.v.
Reg. Imp. Lecco 00076670132

REACH – SVHC – SCIP Declaration

Regulation (EC) No 1907/2006 – Candidate List as updated on 3 June 2026

Valmadrera, July 2026

To all our Customers

SUBJECT: Compliance with the REACH Regulation, absence of Substances of Very High Concern (SVHC) and SCIP database notification obligations.

Dear Customer,

since 2008 the company has developed the subject matter of this letter, acquiring the terms, definitions, procedures and responsibilities set out in Regulation (EC) No 1907/2006 (REACH) and integrating them into its management system. By means of this letter, the company

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Via Santa Vecchia 82 – 23868 Valmadrera (LC) – Italy

VAT No. IT 00076670132 – Lecco Company Register 00076670132

Management systems certified to ISO 9001 – IATF 16949 – ISO 14001 – EN 9100

hereby declares the following.

1. Role of the company within the supply chain

Given the nature of the products manufactured and of the production processes employed, the company qualifies as a downstream user according to the definitions provided by ECHA.

The company does not in any case qualify as a manufacturer or importer of substances or mixtures within the meaning of the REACH Regulation, but solely as a processor of substances or mixtures manufactured or imported by third parties, upon whom the registration obligations rest.

2. SVHC substances and the SCIP database

The company declares that it neither manufactures nor supplies any article containing substances included in the Candidate List of Substances of Very High Concern (SVHC), as updated on 3 June 2026, in a concentration above 0.1 % by weight of the article.

Consequently, no obligation to communicate information under Article 33 of the REACH Regulation arises.

For the same reason, pursuant to Directive 2008/98/EC on waste, as amended by Directive (EU) 2018/851 of 30 May 2018 — whose obligations have applied since 5 January 2021 — the company is not subject to the obligation to notify the SCIP database established by ECHA.

3. Commitments towards the supply chain

The company declares that it is aware of its obligations and undertakes to fulfil them, also verifying that its own suppliers operate in accordance with the REACH Regulation.

Consistently with its role, the company maintains ongoing communication with its suppliers, both to urge their full adherence to the Regulation and to define the intended use of the products purchased. This communication



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process involves all suppliers of raw materials and of surface treatments, as parties potentially concerned by the subject matter.

Each supplier is required to provide a declaration confirming that it is aware of its obligations, that it fulfils them, and that it in turn verifies that its own suppliers operate in accordance with the REACH Regulation.

4. Updating and communication of information

On the basis of the information received from its suppliers, the company updates the safety data sheets within the timeframes and by the methods laid down by the Regulation, and promptly informs its Customers of any changes or amendments.

This declaration will be reissued upon any update of the Candidate List that entails changes to the statements made above.

We remain at your disposal for any further clarification and take this opportunity to send you our best regards.

Best regards,

DELL'ERA ERMANN E FIGLIO S.r.l.

General Manager

Paolo Dell'Era