

STATEMENT OF SJM ALLOYS AND METALS LTD REACH STATUS

SJM Alloys and Metals Ltd reviews its REACH compliance status, by periodic assessment of their incoming materials to ensure their continued compliance to the REACH regulations. We will fully register any substance that becomes liable for such registration.

As a matter of preparedness, all the substances that we currently sell on their own or in alloys (considered special preparations) have been pre-registered together with a number of substances we may trade in the future. In this way, we can proceed to full registration as and when the need arises.

The following statements describe SJM Alloys and Metals Ltd current status on reach:

- SJM Alloys and Metals Ltd is not the prime manufacturer of any of the substances we trade and as such have no legal obligation to pre-register or fully register these substances.
- Similarly, in many cases SJM Alloys and Metals Ltd are not the primary importer of the substances we trade, as they are all sourced from EU suppliers and SJM Alloys and Metals Ltd is therefore considered a downstream user and again has no legal obligation to pre-register or fully register these substances.
- SJM Alloys and Metals Ltd also procures much of its feedstock from secondary/scrap sources from which it recovers substances. Such substances are exempted from Title II (Registration), Title V (Downstream Users) and Title VI (Evaluation) as described in the reach regulations, (EC) No 1907/2006 Article 2 (7) d, which states the following:

7. The following shall be exempted from Titles II, V and VI:
(d) substances, on their own, in preparations or in articles, which have been registered in accordance with Title II and which are recovered in the Community if:
(i) the substance that results from the recovery process is the same as the substance that has been registered in accordance with Title II;
and
(ii) the information required by Articles 31 or 32 relating to the substance that has been registered in accordance with Title II is available to the establishment undertaking the recovery.
- To enable the potential sourcing of cheaper raw materials from outside the EU, SJM Alloys and Metals Ltd regularly reviews its substance requirements to determine if full registration is prudent to allow the import of these substances into the EU, should the quality and commercial case be made to do so. We are currently in the process of full registering iron for this purpose!

General Statement related to Dangerous Substances

The metals and alloys that SJM Alloys and Metals Ltd sells:-

1. *do not contain any substance listed in Annex XIV to EC Regulation 1907/2006 (Substances requiring an Authorization)*
2. *do not contain any substance listed in Annex XV to EC Regulation 1907/2006 (Substances of Very High Concern). Furthermore, our products do not contain any substance included in the current Candidate List*
3. *do not contain any substance classified as CMR (Carcinogenic, Mutagenic, or toxic to Reproduction) according to the criteria for classification in category 1 or 2 in accordance with EC Directive 67/548 and EC Regulation 1272/2008*
4. *do not contain any substance classified as PBT (Persistent, Bioaccumulative, or Toxic) according to EC Regulation 465/2008*
5. *do not contain any substance classified as vPvB (very Persistent or very Bioaccumulative) according to EC Regulation 465/2008*
6. *do not contain any substance with risk level equivalent to the above categories to the best of our knowledge.*

A list of the substances with their pre-registration numbers and where applicable their full registration numbers is given in Appendix 1 of this document.

Appendix 1 - List of Substances

| Substance | EC Number | CAS Number | Reach Pre-Registration Number | Expiry of Pre-Registration | Reach Full Registration Number |
|-------------|-----------|------------|-------------------------------|----------------------------|--------------------------------|
| Aluminium | 231-072-3 | 7429-90-5 | 05-2118356891-33-0000 | 31 May 2018 | N/A |
| Beryllium | 231-150-7 | 7440-41-7 | 05-2118368574-31-0000 | 31 May 2018 | N/A |
| Bismuth | 231-177-4 | 7440-69-9 | 05-2118367575-30-0000 | 31 May 2018 | N/A |
| Boron | 231-151-2 | 7440-42-8 | 05-2118364561-42-0000 | 31 May 2018 | N/A |
| Calcium | 231-179-5 | 7440-70-2 | 05-2118369251-44-0000 | 31 May 2018 | N/A |
| Carbon | 231-955-3 | 7782-42-5 | 05-2118365142-49-0000 | 31 May 2018 | N/A |
| Chromium | 231-157-5 | 7440-47-3 | 05-2118363903-37-0000 | 31 May 2018 | N/A |
| Cobalt | 231-158-0 | 7440-48-4 | 05-2118350544-44-0000 | 31 May 2018 | N/A |
| Copper | 231-159-6 | 7440-50-8 | 05-2118360575-37-0000 | 31 May 2018 | N/A |
| Gallium | 231-163-8 | 7440-55-3 | 05-2118365333-44-0000 | 31 May 2018 | N/A |
| Hafnium | 231-166-4 | 7440-58-6 | 05-2118355052-52-0000 | 31 May 2018 | N/A |
| Indium | 231-180-0 | 7440-74-6 | 05-2118365828-25-0000 | 31 May 2018 | N/A |
| Iron | 231-096-4 | 7439-89-6 | 05-2118356435-39-0000 | 31 May 2018 | In progress |
| Lead | 231-100-4 | 7439-92-1 | 05-2118369661-35-0000 | 31 May 2018 | N/A |
| Magnesium | 231-104-6 | 7439-95-4 | 05-2118362268-36-0000 | 31 May 2018 | N/A |
| Manganese | 231-105-1 | 7439-96-5 | 05-2118362712-43-0000 | 31 May 2018 | N/A |
| Molybdenum | 231-107-2 | 7439-98-7 | 05-2118359306-39-0000 | 31 May 2018 | N/A |
| Neodymium | 231-109-3 | 7440-00-8 | 05-2118364371-45-0000 | 31 May 2018 | N/A |
| Nickel | 231-111-4 | 7440-02-0 | 05-2118361847-29-0000 | 31 May 2018 | N/A |
| Niobium | 231-113-5 | 7440-03-1 | 05-2118358618-29-0000 | 31 May 2018 | N/A |
| Oxygen | 231-956-9 | 7782-44-7 | 05-2118368212-47-0000 | 31 May 2018 | N/A |
| Phosphorous | 231-768-7 | 7723-14-0 | 05-2118366630-43-0000 | 31 May 2018 | N/A |
| Rhenium | 231-124-5 | 7440-15-5 | 05-2118363942-35-0000 | 31 May 2018 | N/A |
| Ruthenium | 231-127-1 | 7440-18-8 | 05-2118364242-48-0000 | 31 May 2018 | N/A |
| Selenium | 231-957-4 | 7782-49-2 | 05-2118367892-28-0000 | 31 May 2018 | N/A |
| Silicon | 231-130-8 | 7440-21-3 | 05-2118363245-43-0000 | 31 May 2018 | N/A |
| Strontium | 231-133-4 | 7440-24-6 | 05-2118364874-29-0000 | 31 May 2018 | N/A |
| Sulphur | 231-722-6 | 7704-34-9 | 05-2118367298-28-0000 | 31 May 2018 | N/A |
| Tantalum | 231-135-5 | 7440-25-7 | 05-2118362282-46-0000 | 31 May 2018 | N/A |
| Tellurium | 236-813-4 | 13494-80-9 | 05-2118368855-25-0000 | 31 May 2018 | N/A |
| Tin | 231-141-8 | 7440-31-5 | 05-2118364657-29-0000 | 31 May 2018 | N/A |
| Titanium | 231-142-3 | 7440-32-6 | 05-2118349867-23-0000 | 31 May 2018 | N/A |
| Tungsten | 231-143-9 | 7440-33-7 | 05-2118362914-35-0000 | 31 May 2018 | N/A |
| Vanadium | 231-171-1 | 7440-62-2 | 05-2118357418-34-0000 | 31 May 2018 | N/A |
| Zinc | 231-175-3 | 7440-66-6 | 05-2118366213-47-0000 | 31 May 2018 | N/A |
| Zirconium | 231-176-9 | 7440-67-7 | 05-2118361709-31-0000 | 31 May 2018 | N/A |

Document Update Log

| Date/Ref | Details |
|-----------------|---|
| 31-Jan-2014 | Original |
| 11-Feb-2014 | 1. Section added stating that the metals and alloys sold by SJM Alloys and Metals Ltd do not containing dangerous substances as defined in the EC Regulations or Directives |