



Declaration to customers

Declaration of purchase of raw materials for Robert Laminage SA

As a supplier of precision cold rolled metal strip, Robert Laminage SA is committed to ensuring the safety, health and protection of the environment and the people who come into contact with our products. As a responsible corporate citizen, we respect and continually strive to meet government, industry and environmental standards worldwide.

RBA Declaration of Conformity (formerly EICC) :

Robert Laminage SA supports the position of the RBA (formerly EICC) to ensure that workers are treated with respect and dignity and that the company's operations are environmentally responsible and ethically conducted.

Position paper on REACH Regulation (EU) No 1907/2006 :

Our metal products, manufactured in Switzerland and exported to the European Union, are classified as articles according to ECHA's "Guidance on requirements for substances in articles". This guidance specifies that metals in massive or wrought form are classified as articles, and not as substances or preparations.

Under this guide, substances contained in our articles do not have to be registered unless they exceed one tonne per year per manufacturer or importer, or the substance is released voluntarily. Manufacturing processes such as machining, grinding or welding, as well as normal wear and tear, are not considered to be intentional releases of substances.

It is important to note that if a metal product is intended to be remelted, for example in the form of a materially transformed ingot, it will be considered as a substance (pure metal) or a preparation (alloy), and its components will then be subject to REACH registration requirements.

RLSA is fully aware of the requirements of the REACH Regulation (EC 1907/2006) and declares, on the basis of the information provided by our suppliers, that none of its articles contain substances of very high concern (SVHC) in concentrations exceeding 0.1% weight by weight (0.05% for Lead), in accordance with Article 33 of the REACH Regulation. The latest version of the list of substances can be found at the following address:
<https://echa.europa.eu/fr/candidate-list-table>

For substances classified as being of very high concern in concentrations above 0.1% by weight, we are obliged to inform users of the presence of this substance and to provide instructions for its safe use. We can assure you that, according to the current ECHA list, our products do not contain any substances that are candidates for authorisation.



RoHS Declaration of Conformity :

We hereby confirm that our products comply with Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011. This directive concerns the restriction of the use of certain hazardous substances in electrical and electronic equipment and is of particular relevance to the European Economic Area. Our products comply with the maximum permissible limits by weight in homogeneous materials as specified in this directive.

We also ensure compliance with European Directive 2012/19/EU (WEEE), which concerns the management of waste electrical and electronic equipment. We take all the necessary measures to ensure that our products are collected, treated and recycled responsibly at the end of their life, in accordance with this directive.

These commitments underline our dedication not only to the quality and safety of our products, but also to our environmental responsibility.

- Lead < 0.1
- Mercury < 0.1
- Cadmium < 0.01
- Hexavalent chromium (VI) < 0.1
- Polybrominate biphenyls (PBB) < 0.1
- Polybrominated diphenyl ethers (PBDEs) < 0.1
- Bis(2-ethylhexyl) phthalate (DEHP) < 0.1
- Butyl benzyl phthalate (BBP) < 0.1
- Dibutyl phthalate (DBP) < 0.1
- Diisobutyl phthalate (DIBP) < 0.1

REACH; RoHS :

Certain exceptions are made for alloys voluntarily containing lead in limited quantities:

Strip CuZn37Pb2, CuZn38Pb2 and CuZn39Pb2	1.6 - 2.5 %
Strip CuNi12Zn25Pb	< 1.5 %
Strip Robert 16Pb steelband	0.15 - 0.3 %
Strip BandSteel Robert 3	0.15 - 0.25 %

Minnesota Lead and Cadmium Act of 2023:

In accordance with Minnesota Statute 325E.3892, our products comply with the following restrictions concerning hazardous substances:

- Lead: no more than 0.009% of total weight (90 parts per million)
- Cadmium: no more than 0.0075% of total weight (75 parts per million)

This legislation aims to reduce consumer exposure to these potentially harmful heavy metals, and we ensure that all our products for the US market meet these strict standards. In addition, we can provide specific analyses on request that guarantee these particularly low levels of impurities, to ensure the compliance and safety of our products.

Dodd-Frank Act / Conflict minerals (3TG) :

The Dodd-Frank Act serves primarily to reform the law on the US financial markets, but it also contains disclosure and reporting requirements for companies listed on the US stock exchange concerning the use of certain raw materials from the Democratic Republic of Congo or neighbouring countries. The conflict over minerals (3TG) concerns tin, tantalum, tungsten, gold and their derivatives. It also aims to restrict or prevent trade in these substances from conflict zones. In this context, we have tested our main suppliers against these requirements and can confirm that none of the metals mentioned above come from one of the countries in conflict mentioned on the list, such as the Democratic Republic of Congo or neighbouring countries. We would point out that all our manufacturers also use metals from recycling or scrap metal. As the information is provided by our suppliers, we cannot be held responsible for its accuracy.

To ensure that we only buy raw materials that are free from conflict, we only source from suppliers who act in an environmentally and socially sustainable manner.

We request a raw materials declaration from all our raw materials suppliers and strive to ensure that our supply chain is fully compliant with all applicable laws, rules and regulations.

Robert Laminage SA's commitment to recycling

At Robert Laminage SA (RLSA), recycling is at the heart of our approach to sustainability, protecting resources and making an active contribution to saving energy and protecting the environment. We take this commitment very seriously and work closely with reliable partners to constantly improve our processes.

Our materials and their recyclability :

- **Metals used :** Brass, Copper, Bronze, Lead, Nickel Silver, Steel, Aluminium and Pfinodal.
- **Recyclability:** Copper and its alloys, including those we use, are fully recyclable.
- **Waste management:** We rigorously sort all our manufacturing waste.
- **Waste recovery:** This waste is then sent to specialist partners for effective recovery.
- **Recycled Content:** The proportion of recycled content in the products we supply varies between 60-70%, and in some cases can be as high as 80%.

It is important to note that, for technical reasons specific to our manufacturing processes, it is not currently possible to exceed this recycling rate. Nevertheless, the use of recycled materials can reduce CO2 emissions by up to 90% compared with production using non-recycled materials.

At RLSA, we are proud of our ongoing efforts to not only respect but excel in our environmental practices, ensuring a more sustainable future for all.



Declaration of compliance with California Proposition 65

As part of our product management and regulatory compliance efforts, Robert Laminage SA (RLSA) continues to monitor potential regulatory, safety, health and environmental risks. As such, we would like to inform you of the requirements of the California Proposition 65 regulations.

California's Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, went into effect in November 1986. Proposition 65 requires companies to provide warnings about significant exposures to chemicals known to cause cancer, birth defects or other reproductive harm.

For more information on warnings and the list of Proposition 65 chemicals, visit the website www.P65Warnings.ca.gov.

RLSA is committed to providing safe, high quality products. We work with our supply chain partners to ensure the purchase of raw materials that comply with Proposition 65. Most products manufactured by RLSA do not contain substances regulated by California Proposition 65 that result in exposures above the safe levels determined by OEHHA.

However, we would like to inform you that the products listed below contain a limited amount of lead, which is regulated by California:

Strip CuZn37Pb2, CuZn38Pb2 and CuZn39Pb2	1.6 - 2.5 %
Strip CuNi12Zn25Pb	< 1.5 %
Strip Robert 16Pb Steelband	0.15 - 0.3 %
Strip Steelband Robert 3	0.15 - 0.25 %

This information is based on our current knowledge and covers commercial products supplied by RLSA at the date of issue. RLSA makes no warranty, express or implied, and assumes no liability in connection with the use of this information.

The situation will be reviewed annually and updated accordingly.

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ROBERT LAMINAGE SA

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