

Le Cheylas, February 20th 2018

Subject: Winoa's duties regarding CLP regulation

Product: Refined iron ingots

The Classification, Labelling and Packaging (CLP) Regulation ((EC) No 1272/2008) is based on the United Nations' Globally Harmonised System (GHS) and its purpose is to ensure a high level of protection of health and the environment, as well as the free movement of substances, mixtures and articles.

The CLP Regulation amended the Dangerous Substances Directive (67/548/EEC (DSD)), the Dangerous Preparations Directive (1999/45/EC (DPD)) and Regulation (EC) No 1907/2006 (REACH). Since 1st June 2015, CLP is the only legislation in force in the EU for classification and labelling of substances and mixtures.

In accordance with REACH and CLP regulations, products manufactured by Winoa are considered to be mixtures.

All intentionally added alloying elements for the production of refined iron are not classified as hazardous.

According to CLP regulation, an alloy can be classified either on its constituent's classification.

Winoa considers that none of its refined iron products are classified as dangerous.

Please, note that due to the scrap recovery process, other unintentionally added elements such as Chromium (Cr), Nickel (Ni), Copper (Cu) may be present as impurities. The concentrations of these elements could in some cases individually exceed more than 0.1% w/w but do not lead to a global classification of the alloy.

Following REACH regulation, Winoa will not systematically provide a Safety Data Sheet to its customers, but on request. SDS and exposure scenarios are available and will be communicated on request.