

Le Cheylas, February 20th 2018

Subject: Winoa's statement regarding REACH regulation

Product: Refined iron ingots

On the 1st of June 2007, the REACH regulation (regulation N° 1907/2006 established on 12/18/06) entered into force in the European Community, without the necessity of being transposed into national law.

The registration procedure established by this regulation means that no chemical substances on their own, in mixtures or in articles shall be manufactured in the Community, imported or placed on the market unless a registration has been submitted to the ECHA (European Chemical Agency).

Winoa has thoroughly examined the EU's REACH regulation to identify its roles and duties.

All products manufactured by Winoa are produced from recovered scrap metal. The scrap is melted in electric furnace and the main raw material valorized is iron (Fe, CAS 7439-89-6, EC 231-096-4) that is already a registered substance. According to article 2.7d) of REACH regulation, Winoa as the entity operating the recovery process is exempted from registration for this valorized substance.

Further additions of substances (C, Mn, Si, Cr, P) are made in the steel bath to reach targeted composition of the refined iron products and to provide specific physicochemical characteristic functions to the product. Winoa has worked with its supply chain to assure itself that all these raw materials added in the steel bath are registered.

Please, note that due to the scrap recovery process, other unintentionally added elements may be present as impurities and do not require any registration.

Winoa has no obligation to register any substances under REACH regulation.