

METALCAM S.p.A.

Title: List of approvals & Declarations of Principle

Contents:

- 1. Management System Certification**
- 2. Manufacturer Approvals**
- 3. Radioactive contamination**
- 4. Heavy metals**
- 5. Welding on product**
- 6. RoHS Directive**
- 7. REACH Regulation**
- 8. Conflict Minerals Policy**

Revision	Data	Description edits	Issued	Reviewed	Approved
04	May 21, 2021	Updated Certs.	A. Nobile (QM)	M. Cocchi (SM)	M. Cocchi (GM)

1. Certification of the Management System

Certified by	Content	No. Certificate	Validity
LRQA	Quality Management System according to ISO 9001:2015 for: Manufacture of ingots, raw and finished forging and shapes in carbon, alloyed and stainless steel	110302481	November 27, 2023
ACCREDIA	The accreditation certifies the technical competence of the laboratory limited to the scope detailed in the attached Enclosure. The present certificate is valid only if associated to the annexed schedule, that may vary in the time. Confirmation of the validity of accreditation can be verified on website www.accredia.it or by contacting the relevant Department. The management system requirements in ISO/IEC 17025 are written in language relevant to laboratories operations and generally operate in accordance with the principles of ISO 9001 (refer joint ISO-ILAC-IAF Communiqué dated April 2017).	1647 Rev. 1	July 19, 2021

2. Manufacturer Approvals

Certified by	Content	No. Certificate	Validity
1. Korean Register	Manufacturer Approval for Carbon and Low Alloy Steel Forgings Up to 30.000 Kg Forging weight	MIL19187-SF001	April 13, 2026
2. Rina	Manufacturer Approval for Carbon, Carbon-Manganese Steel and Alloy Steel Forgings Up to 30.000 Kg Forging weight	FAB055618MI	February 25, 2023
3. Bureau Veritas	Manufacturer Approval for Recognition for BV Mode II Scheme for Steel Forgings made in Carbon Manganese, Low Alloy Steel Up to 30.000 Kg Forging weight	SMS.W.II/3292/06A0	March 21, 2022
4. Det Norske Veritas	Manufacturer Approval for Steel Forgings for Hull structures and equipment, Shafting and machinery, boilers, pressure vessels and piping system made in Carbon, Carbon Manganese and Alloy Up to 32.000 Kg Forging weight Including Steelmaking process	AMMM000024H_R01	December 31, 2021
5. Det Norske Veritas	Manufacturer Approval for Steelmaking of Ingots for chain cables in grade R3S by Electric arc furnace, Vacuum degassing, Ingot casting	AMMM00002AS	December 31, 2021

6. Rina	Manufacturer Approval for Steels Forgings according to Alternative Testing Scheme	2016/MI/01/343	May 31, 2021
7. Tüv Süd	Manufacturer Approval according to AD2000-Merkblatt W0 for ingots, raw and finished forgings and shapes in Carbon, Alloyed and Stainless steel Manufacturer Approval according to Pressure Equipment Directive 2014/68/EU Annex I, Section 4.3 for ingots, raw and finished forgings and shapes in Carbon, Alloyed and Stainless steel	DGR-0036-QS-W 198/2003/MUC	May 31, 2022
8. American Bureau of Shipping	Manufacturer Approval for Steel Forging and Stainless-Steel Forging components for marine applications	FOR-T1595585	November 13, 2021
9. Lloyd's Register of Shipping	Manufacturer Approval for Steel Forgings in Carbon, Carbon-Manganese, Alloy and Austenitic Stainless steel Up to 30.000 Kg Forging weight Including Steelmaking process	LR2065217WA	January 01, 2023
10. Bureau Veritas	Manufacturer Approval for Steel Forgings made in Carbon Manganese and Alloy Steel Up to 16.000 Kg Forging weight	20471/B0 BV	May 31, 2024

3. Radioactive Contamination

We hereby declare that the products supplied by us are free of radioactive contamination ($< 0,1\mu\text{Sv/h}$ about background noise). The primary materials relevant to our steel production (steel scrap, ferro-alloys, auxiliary materials) are checked accordingly upon delivery. The output of our products is also subject to the same metrological monitoring through the obliged passage for RMDS (Radioactive Material Detection System).

To guarantee more reliability on the manufacturing process we have control gates to verify the radioactive contamination.

4. Heavy Metals

We confirm herewith that the products supplied by us are free from radioactive contamination ($< 0,1\mu\text{Sv/h}$ about background noise)

We herewith declare that all products manufactured and supplied by us are in compliance with the heavy metal ban according to the EU Directive 2000/53/EC (of 18.09.2000) regarding end-of life vehicles and the Commission's decision amending Annex II of this Directive (of 18.05.2016).

The prohibitions and limit values for the restricted use of lead, cadmium, mercury and Cr (VI) contained therein are complied with by our production facilities. Our products are free of mercury.

5. Welding on Product

We hereby declare that no welds are made on forged product manufactured by Metalcam S.p.A.

If it is necessary to repair the forged product through welding process Metalcam verifies if the customer's specification allow it and sends to the customer a concession request for approval.

6. RoHS | Restriction of Hazardous Substances

DIRECTIVE 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (recast) transposed and implemented with Legislative Decree no. 27 of March 4, 2014 and,

COMMISSION DELEGATED DIRECTIVE (EU) 2015/863 of 31 March 2015 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council relevant to the list of restricted substances

DECLARATION OF CONFORMITY

Dear Customer,

We would like to inform you that our products are entirely constituted of steel and do not fall within the scope of the Directive 2011/65/UE (RoHS II) and 2015/863 (RoHS III).

All products we supply to our customers do not contain any substance that cannot be sold, in compliance with the Directive called RoHS (Restriction of Hazardous Substances).

7. REACH | Registration, Evaluation, Authorization and restriction of Chemicals

REGULATION (EC) No 1907/2006 of the EUROPEAN PARLIAMENT and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

INFORMATION FOR CUSTOMERS

Dear Customer,

We would like to inform you that, according to the guidelines of the ECHA Agency about "requirements of the substances contained in the products", declared in the Appendix 3, on the 29th of August it was issued the EUROFER position Chart (European Confederation of the Iron and Steel Industries) which considers that the steel products can be defined as articles without intentional release of substances.

The steel products we sell do not contain substances of very high concern called SVHC (Substances of Very High Concern) currently mentioned in the "candidate list" document or in the Annex XIV of the REACH regulation

In compliance with the aforementioned statement, it is not necessary, pursuant to the REACH Regulation, to provide any further information to the buyers of our products. Furthermore, "the obligation to communicate information on the substances present in the articles" according to Article 33 does not apply to our products as it does not meet the criteria set out in Article 57 and identified with Article 59, paragraph 1.

We consider this notification as a general declaration, so that it is not necessary to provide each time a confirmation / declaration in addition to our test certificates.

8. Policy Conflict Minerals

“Conflict Minerals” rule finalized on August 22, 2012, by SEC as directed by Section 1502 of the Dodd-Frank Act of 2010 which applies to products containing any of the four conflict minerals (Tin, Tantalum, Tungsten and Gold) originated in the Democratic Republic of Congo (DRC) or adjoining countries

INFORMATION FOR CUSTOMERS

Dear Customer,

We wish to inform you that Metalcam is constantly engaged to operate in a socially responsible manner, adopting a policy focused to discourage the purchase of DCR Conflict Minerals whose proceeds could be used to finance or facilitate armed groups in the Democratic Republic of Congo or in the neighboring countries, either directly or indirectly; regardless of their origin.

Metalcam does not purchase any derivate of conflict minerals or directly from the smelters but has established a strict purchasing policy that provides methods to determine sourcing of the of Fe-W and to ensure that it is DRC conflict-free:

- Actually, Fe-W is purchased from Fe-Alloy trading companies sourcing Fe-alloy from manufacturers that obtain the alloying metal from refiners and smelters.
- Metalcam requires to the Fe-Alloy traders to buy material NOT having origin in the DRC or adjoining countries.
- Metalcam requires its Fe-Alloy suppliers to identify and declare all the smelters providing Fe-W.

The above-mentioned points are declared by Metalcam annually in the Conflict Minerals Reporting Template (CMRT), in order to collect sourcing information on 3TG.