

GRUPPO LUCEFIN

POSITION OF THE LUCEFIN GROUP ON DIRECTIVE 2011/65/EU ROHS II

ESINE, DECEMBER 2012

On January 3, 2013, the European Directive 2002/95/E (known as RoHS) has been replaced by the new Directive 2011/65/UE (RoHS-II).

This Directive rules the use of dangerous substances in electric and electronic devices (AEE).

In particular, the Directive requires all member States to make sure that all such devises marketed in the market of the European Community are free from lead, mercury, cadmium and hexavalent chromium, as well as poly-brominated biphenyls and poly-brominated di-phenyl ethers.

However, the Directive specifies that the presence of these substances is allowed for some specific applications and sets the maximum levels of their concentration in some materials (so-called homogeneous).

The companies of the Lucefin Group produce and trade steel bars (cold-drawn, peeled, ground, hot-rolled, forged) as well as forged steel blocks and cold-drawn or extruded bars in brass and aluminum alloys.

The materials sold by the Lucefin Group can be considered homogeneous, whose definition given by the article 3 of the Directive RoHS-II is the following:

A "Homogeneous material" is a material with a uniform composition or a material obtained thanks to the combination of more than one component which cannot be split in different materials through mechanical actions like unscrewing, cutting, crushing, grinding and abrasive processes.

For these homogeneous materials, the Lucefin Group respects the maximum levels of concentration in weight tolerated for these substances, indicated in annex. II of the Directive, which are:

- lead (0,1%)
- mercury (0,1%)
- cadmium (0,01%)
- hexavalent chromium (0,1%)
- poly-brominated biphenyls (PBBP) (0,1%)
- poly-brominated di-phenyl ethers (PBDE) (0,1%)

This applies also to some products manufactured and traded by the Lucefin Group for specific applications.

These products fall into the applications allowed by annex. III of the Directive. Among these exceptions there are:

- Lead as an alloy in steel for mechanical processing and galvanized steel containing up to 0,35% of lead in weight
- Lead as alloy in aluminum containing up to 0,4% of lead in weight
- Copper alloys containing up to 4% of lead in weight.

The Lucefin Group includes the following companies:

ACCIAI BRIANZA Desio (MB) TRAFILIX Esine (BS) TRE VALLI ACCIAI Berzo Inferiore (BS) CO.MET. ACCIAI Brescia TRAFITEC S. Colombano al Lambro (MI) COSMO ACCIAI Spilamberto (MO) TRAFIL CZECH Kladno, CZ NUOVA BASSANI Forlì (FC) SIDERCONERO Osimo Stazione (AN) SIDERMARCA Ponzano Veneto (TV) TRA.ME.T. Orbassano (TO) KSM STAHL Empfingen, D