

REACH & Responsible Minerals (Conflict Materials) Compliance Policy and Declaration

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Version: 1.0

Global Metal Finishing, Inc.
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1. Scope: This policy applies to all substances, mixtures, and finished articles handled by Global Metal Finishing, Inc. during metal finishing services (e.g., anodizing, hardcoat, electroless nickel, painting/coating, electroplating, including nickel/chrome/tin/gold). It governs products we use on products going on the EU/EEA market directly or via importers/distributors.

2. Our Commitments

- We comply with the EU REACH Regulation (EC) No 1907/2006, including the Candidate List of substances of very high concern (SVHC), Authorization (Annex XIV), and Restriction (Annex XVII) obligations.
- We perform supply-chain due diligence on “conflict minerals” (3TG: tin, tantalum, tungsten, gold) under EU Regulation (EU) 2017/821 and the OECD framework, and we use the latest RMI templates (CMRT 6.5 and EMRT 2.0).

3. REACH Compliance

3.1 Candidate List (SVHC) obligations

- We continuously screen chemicals (SDS/ES) and finished articles we ship for SVHC presence. When an article we supply contains one or more Candidate List substances >0.1% w/w, we will inform recipients with the substance name(s) and safe-use information per Article 33(1); on consumer request, we respond within 45 days per Article 33(2).
- The Candidate List is updated several times a year (most recently June 25, 2025, added three substances). We monitor ECHA’s live list and update our declarations accordingly.
- SCIP (Waste Framework Directive): If we place articles in the EU containing SVHCs >0.1% w/w, we (or our EU importer) ensure SCIP notification to ECHA (in force since Jan 5, 2021). We can provide SCIP numbers to customers on request.
- Article 7(2) notifications to ECHA: If applicable (SVHC in articles >0.1% w/w and total >1 t/y per producer/importer and exposure not excluded), we will notify ECHA. (We assess applicability case-by-case via our SVHC inventory and tonnage tracking.)

3.2 Authorization (Annex XIV)

- For any Annex XIV substance (e.g., chromium trioxide/Cr (VI) uses in certain electroplating/etching), we do not place on the EU market unless covered by a valid authorization (our own or a supplier's) for the specific use, and we keep the required exposure scenarios/operational conditions. We monitor ECHA's authorization List updates and review-period decisions.

3.3 Restrictions (Annex XVII) & emerging issues

- We comply with all entries relevant to metal finishing (e.g., certain chromates, DMF/NMP handling, per- and polyfluoroalkyl substances (PFAS) entries/POPs transfers, nickel release in articles where applicable). We monitor the Annex XVII page for changes.
- Chromium (VI): We track the 2025 EU proposal to expand restrictions on certain Cr(VI) substances and will update our substitution plans and controls as these advances.
- PFAS: We track the EU's broad PFAS restriction project and PFHxS control under EU POPs to keep our chemistries compliant.

3.4 Roles & records

- Compliance Officer maintains substance inventory, SVHC screening log, Article 33 communications, SCIP evidence (where applicable), and supplier REACH confirmations/SDS. Records retained ≥5 years.

4. Responsible Minerals (Conflict Materials) Initiative (RMI) Declaration

4.1 Regulatory basis & scope

- We support the objectives of Regulation (EU) 2017/821 and the OECD Due Diligence Guidance. Where we use or source **3TG** (e.g., **tantalum**, **tin** anodes, **tungsten** components, gold for plating), we perform due diligence irrespective of importer status.

4.2 Templates & cadence

- We collect supplier declarations annually (and on change) using:
 - Conflict Mineral Reporting Template (CMRT v6.5) (released Apr 25, 2025) for 3TG.
 - Extended Mineral Reporting Template EMRT v2.0 (released Apr 25, 2025) for extended minerals (cobalt, mica; plus 2025 additions: copper, natural graphite, lithium, nickel).
- Responsible Minerals Initiative, RMI's RMAP (or equivalent), and track them via the templates' lists.

4.3 Due-diligence process (OECD 5-step mapped)

1. Strong policy & management system: This document, roles, and training are defined.
2. Identify & assess risks in the supply chain: Review CMRT/EMRT data, smelter IDs, countries of origin, and flags (CAHRA indications).
3. Design & implement risk response: Escalate with suppliers, seek alternative sources/smelters, or suspend non-responsive/high-risk suppliers.
4. Third-party audit leverage: Prefer RMAP-audited smelters/refiners; consider independent assurance for our program scope.
5. Report annually: Provide customers with current CMRT/EMRT roll-ups and this policy; retain evidence.

4.4 Declaration

Based on supplier CMRT/EMRT responses received as of September 09, 2025, to the best of our knowledge:

- Our products DO NOT contain 3TG necessary for functionality or production.
- When present, 3TG in our supply chain is [sourced from RMAP-conformant smelters/refiners / under investigation].
- For extended minerals (cobalt, mica, copper, natural graphite, lithium, nickel), due diligence via EMRT is ONGOING for suppliers in scope. (We will update this declaration upon material changes.)

5. Supplier Requirements (Contractual)

Suppliers must:

- Provide up-to-date SDS/Exposure Scenarios and confirm REACH registration/notification status for supplied substances/mixtures where applicable.
- Disclose any SVHC >0.1% w/w in supplied articles; support SCIP data where required.
- Ensure no use of substances/applications prohibited by Annex XVII; and notify us before introducing any Annex XIV substance/use.
- Complete CMRT v6.5 and, if applicable, EMRT v2.0, listing all smelters/refiners and providing country-of-origin data.

6. Change Management

- We review ECHA updates (SVHC, Annex XIV/XVII) at each official publication and revise this policy and our BOM/process screening within 30 days of a change. (Note: ECHA updated the SVHC list on June 25, 2025; Cr (VI) restrictions are currently under proposal; PFAS restriction dossier is advancing.)