

**Position Statement of Orbital Fasteners Ltd.
Concerning the EU REACH Regulation**

Dear Customer,

We refer to your request for compliance with the REACH Regulation.

Orbital Fasteners Ltd. is aware of, and assessing, developments in European Union legislation regarding the registration, evaluation, authorisation and restriction of chemicals pursuant to the REACH Regulation (EC) 1907/2006, which entered into force on 1 June 2007.

The EU REACH Regulation was brought into UK law on 1 January 2021 under the European Union (Withdrawal) Act 2018, as UK REACH (Assimilated Regulation 1907/2006 on REACH and the REACH Enforcement Regulations 2008).

The UK REACH and EU REACH regulations now operate independently from each other. UK REACH regulates chemicals placed on the market in Great Britain (GB) - England, Scotland and Wales, while EU REACH continues to apply in Northern Ireland under the terms of the Northern Ireland Protocol.

UK REACH applies to the majority of chemical substances that are manufactured in or imported into GB. This can be:

- a substance on its own
- a substance in a mixture, for example ink or paint
- a substance that makes up an 'article' - an object that is produced with a special shape, surface or design, for example a car, furniture or clothes

Orbital Fasteners Ltd. is aware that under the REACH Regulation the "manufacturer" and "importer" as well as "downstream user" of chemical substances, on their own, in mixtures or in articles, which fall within the definitions of the REACH Regulation; bear certain responsibilities with respect to manufacturing, importation, placing on the market and use of chemical substances.

Under the definitions of the REACH Regulation, Orbital Fasteners Ltd. is considered to be a downstream user.

The key aspects of Orbital Fasteners Ltd. implementation of REACH include, among others.

- Orbital Fasteners Ltd., does not manufacture or import into the EU any substance in quantities of one tonne or more per year and does not produce or import articles containing a substance in quantities of more than one tonne per producer/importer per year which is intended to be released from the article under normal or reasonably foreseeable conditions of use. Therefore, Orbital Fasteners Ltd. is not under the obligation to register substances under REACH. It is anticipated that Orbital Fasteners Ltd. suppliers carry out all necessary registrations in a timely manner or any required timescales.
- Orbital Fasteners Ltd. is aware of the Candidate List of Substances of Very High Concern (SVHC) published by the European Chemicals Agency (<https://echa.europa.eu/candidate-list-table>), and of the fact that, being a supplier of articles, Orbital Fasteners Ltd. has a responsibility to identify any SVHC contained in its articles in concentrations above 0.1 % w/w and to communicate sufficient information, available to the supplier, on SVHC to the recipients of those articles and, upon request, to consumers.

Orbital Fasteners Ltd. is making its best efforts to compile the information required to meet the requirements under Article 33 of the REACH Regulation and commits itself to constantly pursue those

efforts in order to be able to provide the information required to be provided under Article 33 of the REACH Regulation as soon as to the extent it is in a position to do so.


On the basis of information provided to Orbital Fasteners Ltd. from its suppliers, SVHC have not been identified in any products. Based on your purchase history with Orbital Fasteners Ltd and in conjunction with the Candidate List of SVHC for Authorisation no SVHC are noted. Orbital Fasteners Ltd. products do not contain substances as listed in Annex XVII of the REACH regulation.

Orbital Fasteners Ltd., will continuously monitor the Candidate List as it gets revised and will provide all required and current information if SVHC in a concentration above 0.1% w/w are identified in an article supplied.

We will closely monitor any relevant REACH issues and will continue to adapt our compliance strategy to known changes with regard to the REACH requirements as they occur.

Should you require any further information on REACH and how it may affect your transactions with Orbital Fasteners Ltd. please contact your usual contact in Orbital Fasteners Ltd.

Yours sincerely

Signed:  J WILSON

Name: Jon Wilson
Position: Director
Date: 10th January 2025