

Regulation (EC) No 1907/2006 of the European Parliament is concerned with the Registration, Evaluation, Authorisation and restriction of Chemicals (REACH) and came into force on 1 June 2007. It lays down specific duties and obligations on manufacturers, importers and downstream users of substances on their own, in mixtures and in Articles.

There are many chemicals in use which have potentially unknown associated risks to health and the environment because they have never been fully evaluated. There are currently around 173 Substances of Very High Concern (SVHC) and this continues to rise; the list is updated on a bi-annual basis.

Thus, REACH is being introduced in a phased approach, with different deadlines for the Registration of substances (based on tonnage) and the phased addition of substances to the Candidate List (which drives Article supplier obligations) and may lead to the eventual "banning" of substances via the Authorisation and Restricted Lists.

This policy document defines how the Manufax - Nelson Group will comply with its legal duties and obligations.

Policy Statement

The Manufax - Nelson Group is committed to high standards of health, safety and environmental management and will therefore ensure compliance with the REACH regulation, EC1907/2006 and the resulting obligations.

Since the Manufax - Nelson Group product portfolio contains many different 'Articles' which subsequently contain many varied 'Substances' it will take significant resource to obtain all the relevant chemical composition data from our suppliers in order to determine if any of our products contain SVHC's defined under REACH.

To meet these obligations and ensure compliance, the Manufax - Nelson Group will:

- A] Ensure all substances used by the Manufax - Nelson Group are registered with the European Chemicals Agency (ECHA) and that they are registered for our specific use where an extended safety datasheet is provided.

It is recognised that the Manufax - Nelson Group are not legally required to manage upstream compliance, but this does help prevent downstream supply disruption.

If discrepancies are discovered, the Manufax - Nelson Group will notify ECHA and the upstream supply chain to rectify the issue.

- B] Not use substances subject to authorisation under Annex XIV after the sunset date; unless an authorisation covering the Manufax - Nelson Group and its use is in force.
- C] Not use substances that contravene a restriction detailed in Annex XVII.
- D] Manage article supplier declarations and notify its customers where an article contains an SVHC exceeding 0.1% by weight of the Article.
- E] Where applicable, be capable of demonstrating compliance with Article 7(2) – notification of substances of very high concern in Articles greater than 1t/annum.
- F] Be able to supply 'safe use' information to customers where the article meets the obligations highlighted in D].
- G] Ensure that all manufacturing processes comply with the requirements of the relevant material Safety Data Sheet (SDS); unless an agreed justification for the deviation is risk assessed and in place.

We thank you for your cooperation and understanding as we make progress on this issue of critical importance to our customers and our shared environment.