

September 29, 2025

## **REACH and CLP Declaration of Conformity**

Finkelstein Metals Ltd. is a manufacturer of continuous cast alloys and extrusion alloys, headquartered outside the European Union. As a non-EU entity, the company is not directly subject to the registration obligations under the REACH Regulation (EC) No 1907/2006 or the Classification, Labelling and Packaging (CLP) Regulation (EC) No 1272/2008. However, it recognizes that its products, when exported into the EU customs territory, may trigger obligations for importers, and the company cooperates fully to ensure compliance throughout the supply chain.

The products supplied by Finkelstein Metals Ltd. are solid metal items that fall under the definition of "articles" as specified in Article 3(3) of the REACH Regulation. These articles do not contain substances that are intended to be released under normal or reasonably foreseeable conditions of use and are therefore not subject to the registration requirements set out in Article 7(1).

Finkelstein Metals Ltd. is fully aware of the obligations related to articles under REACH, including those concerning Substances of Very High Concern (SVHC) listed on the Candidate List. The company monitors the presence of SVHCs in its products and ensures that, where applicable, the relevant communication and notification obligations under Articles 7(2) and 33 are met.

In addition, the company is aware of its responsibilities under the CLP Regulation and takes appropriate measures to classify, label, and communicate information about hazardous substances contained in or associated with its products, where relevant. Finkelstein Metals Ltd. works closely with its supply chain partners to ensure that any hazardous substances used upstream are correctly classified and labelled, and that downstream users receive accurate compliant safety information.

Finkelstein Metals Ltd. remains committed to product safety, regulatory compliance, and transparency, supporting its customers in meeting both REACH and CLP obligations across European market.

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https://echa.europa.eu/regulations/reach/understanding-reach

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