RESTRICTION OF HAZARDOUS SUBSTANCES "RoHS II Directive" & WEEE

Purpose – Post BREXIT, UK RoHS & WEEE Legislation will mirror EU RoHS & WEEE unless notified.

The Barrett Steel Group & its subsidiaries are aware of the EU Directive 2011/65/EU (RoHS II) on the Restriction of the use of certain hazardous substances in electrical & electronic equipment, including the revision of Annex II thereof by Directive 2015/863, & the importance of good communication about this throughout its supply chain. The RoHS II Directive is clear in its directive that a producer or importer of materials shall ensure that new electrical & electronic equipment placed on the market on or after 1st July 2006 shall not contain the hazardous substances lead, mercury, hexavalent chromium, cadmium & certain brominated fire retardants, & on or after 22nd July 2019 (according to amending Directive 2015/863)* shall not contain the hazardous substances DEHP, BBP, DBP & DIBP.

Scope

This policy applies to all colleagues of Barrett Steel Limited, regardless of seniority or site. It also extends to anyone working for or on our behalf.

Definition

The European Commission recognised the impossibility of achieving total avoidance of the six banned substances, & formally adopted rules allowing low concentrations of the substances as follows:

Bis(2-ethylhexyl) phthalate (DEHP)	0.1% by weight in homogeneous materials for Bis(2-ethylhexyl) phthalate (DEHP)		
Butyl benzyl phthalate (BBP)	0.1% by weight in homogeneous materials for Butyl benzyl phthalate (BBP)		
Cadmium	0.01% by weight in homogeneous materials for cadmium		
Hexavalent chromium	0.1% by weight in homogeneous materials for hexavalent chromium		
Dibutyl phthalate (DBP)	0.1% by weight in homogeneous materials for Dibutyl phthalate (DBP)		
Diisobutyl phthalate (DIBP)	0.1% by weight in homogeneous materials for Diisobutyl phthalate (DIBP)		
Lead	0.1% by weight in homogeneous materials for lead		
Mercury	0.1% by weight in homogeneous materials for mercury		
Polybrominated biphenyls	0.1% by weight in homogeneous materials for polybrominated biphenyls		
Polybrominated diphenyl ethers	0.1% by weight in homogeneous materials for polybrominated diphenyl ethers		

Policy

All steel grades purchased conform to the requirements of the RoHS II Directive unless advised prior to purchase. The chemical composition of material supplied by the Barrett Group are where applicable supported by the manufacturers Test Certification & where materials are modified, they will be supported by the upgrade & any associated documentation relevant to this directive. The Waste Electrical & Electronic Equipment (WEEE) Directive 2012/29/EU is aimed at reducing the amount of waste electrical & electronic equipment destined for landfill through good design &

recovery at end-of-life. Products are widely recycled & therefore their use in the manufacture of electrical & electronic equipment meets the requirements of the WEEE Directive.

* For some applications the restrictions will apply from 22 July 2021.

Associated Barrett Group Policies & Certification:			
ISO 14001:2015	BES 6001 – Responsible sourcing		
Conflicts Mineral Policy & REACH Statement	Lifecycle – From Rock to Stock to Recycle		

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