

REACH, SCIP, RoHS: LEGAL FRAMEWORK

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What is REACH?

REACH' is an abbreviated term for Regulation (EC) 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH Regulation). The REACH Regulation has been amended a number of times since coming into force, and furthermore several pieces of implementing legislation have been introduced to ensure its operation.

REACH came into force in the UK on 1st June 2007.

UK - EU REACH

Under the European Union (Withdrawal) Act 2018, the EU REACH Regulation was brought into UK law on 1 January 2021 and is known as UK REACH.

REACH, and related legislation, were replicated in the UK with the changes needed to make it operable in a domestic context. The key principles of the EU REACH Regulation were retained in the UK REACH Regulation.

The UK REACH and the EU REACH regulations operate independently from each other.

UK REACH regulates chemicals placed on the market in GB, whereas under the terms of the Northern Ireland Protocol, EU REACH continues to apply in Northern Ireland.

What are the aims of the UK and EU REACH?

REACH cover chemical substances in preparations or in articles intended to be released in the environment. Both regulations aim to:

- provide a high level of protection of human health and the environment from the use of chemicals
- make the people who place chemicals on the market (manufacturers and importers) responsible for understanding and managing the risks associated with their use
- promote the use of alternative methods for the assessment of the hazardous properties of substances - for example quantitative structure-activity relationships (QSAR) and read across.

How do the UK and the EU REACH regulations affect Scolmore Group?

Scolmore Group does not manufacture or add any chemicals to the products it supplies, therefore according to both UK and EU REACH regulations, Scolmore Group and its subsidiary companies can be classed as importers or distributors of “articles”.

What are SHVC?

In general terms, SVHC are substances that have hazards with serious consequences. For example, they cause cancer, or they have other hazardous properties and/or remain in the environment for a long time with their amounts in animals gradually building up.

The criteria to identify the above substances are laid down in Article 57 of the EU REACH as well as in the correspondent Article 57 of the UK REACH.

Substances meeting these criteria maybe placed on one or both of two lists that are defined in the UK REACH Regulation as well as in the EU REACH Regulation: the so called ‘Candidate List’ and the ‘Authorisation List’ (Annex 13).

The EU candidate lists of SVHC are continually updated and published on the ECHA website <https://echa.europa.eu/candidate-list-table>

The correspondent UK candidate lists of SHVC are continually updated on <https://www.hse.gov.uk/reach/candidate-list.xlsx>

Should any of Scolmore Group’s products be registered with the

ECHA / SCIP?

Any company manufacturing or importing into the EU a substance on its own, in a preparation (mixture of substances), or intentionally released from articles (finished manufactured goods) at or above 1 tonne per year may have to register it with ECHA.

The revised WFD (Waste Frame Directive) gave ECHA the tasks to develop a database with information on SVCHs on the Candidate List – called the SCIP Database [Substances of Concern In

articles as such or in complex objects (Products)]. It requires companies that produce, import or supply articles containing SVHCs on the Candidate List in a concentration above 0.1% weight by weight (w/w) to submit information related to these articles placed on the EU market to the SCIP database. This obligation is for articles produced in the EU or imported from non-EU countries.

After tests conducted by our suppliers, we can conclude that releases from our products are not likely to occur at levels that would require registration under EU REACH. Article registration requirements do not therefore apply to Scolmore and its subsidiaries.

What is RoHS?

The purpose of the RoHS Regulations is to restrict certain hazardous substances from entering the production process and to therefore ultimately keep them out of the environment.

RoHS stands for Restriction of Hazardous Substances. RoHS, also known as Directive 2002/95/EC, originated in the European Union and restricts the use of specific hazardous materials found in electrical and electronic products. All applicable products in the EU market after 1st July 2006 must pass RoHS compliance.

What happens after Brexit?

The EU Withdrawal Act 2018 preserves the RoHS Regulations and enables them to be amended so as to continue to function effectively now that the UK has left the EU.

From 1 January 2021 there are differences in the rules for placing electrical and electronic equipment on the market in Great Britain (England, Scotland and Wales) and placing Electrical and Electronic Equipment on the market in Northern Ireland. Those differences are explained on the UK government website at <https://www.gov.uk/guidance/rohs-compliance-and-guidance#overview>

There is therefore one set of UK RoHS Regulations, but some of the provisions apply differently in NI (for as long as the Northern Ireland Protocol is in force). References to the UK RoHS Regulations in this statement are references to those RoHS Regulations as they apply in Great Britain.

What are the restricted materials?

The RoHS directive and the subsequent RoHS 2 (Dir. 2011/65/EU) and RoHS 3 (Directive 2015/863), as well as the UK RoHS regulation specify maximum permitted levels for the following 10 restricted materials.

Restricted Substances Allowable limit

- Lead (Pb) and its compounds < 1000 ppm (0.1 weight %)
- Mercury (Hg) and its compounds < 1000 ppm (0.1 weight %)
- Cadmium (Cd) and its compounds < 100 ppm (0.01 weight %)
- Hexavalent Chromium (Cr VI) and its compounds < 1000 ppm (0.1 weight %)
- Polybrominated Biphenyls (PBB) < 1000 ppm (0.1 weight %)

- Polybrominated Diphenyl Ethers (PBDE) < 1000 ppm (0.1 weight %)
- Bis(2-Ethylhexyl) phthalate (DEHP) < 1000 ppm (0.1 weight %)
- Benzyl butyl phthalate (BBP) < 1000 ppm (0.1 weight %)
- Dibutyl phthalate (DBP) < 1000 ppm (0.1 weight %)
- Diisobutyl phthalate (DIBP) < 1000 ppm (0.1 weight %)

Why is RoHS compliance important?

The restricted materials are hazardous to the environment and pollute **landfills and** are dangerous in terms of occupational exposure during manufacturing and recycling.

What are the regulated products?

All EEE (Electrical and Electronic Equipment) products, unless specifically excluded by either EU RoHS or UK RoHS regulations are in scope.

What is WEEE?

WEEE is the acronym for Waste from Electrical and Electronic Equipment.

Recycling of WEEE is a specialist part of the waste and recycling industry. It is a rapidly growing sub-sector due largely to the implementation of the original WEEE Directive in the UK by the WEEE Regulations 2006, With that came the associated requirements for the recovery, reuse, recycling and treatment of WEEE. The Waste Electric and Electronic Equipment (WEEE) Regulations 2013 ("the Regulations") became law in the UK on the 1st of January 2014 and replaced the 2006 Regulations. The new Regulations transpose the main provisions of Directive 2012/19/EU on WEEE which recasts the previous Directive 2002/96/EC. These regulations also provide for a wider range of products to be covered by the Directive with effect from 1st January 2019.

How are RoHS and WEEE related?

WEEE compliance aims to encourage the design of electronic products with environmentally-safe recycling and recovery in mind. RoHS compliance dovetails into WEEE by reducing the amount of hazardous chemicals used in electronics manufacture.

In other terms RoHS regulates the hazardous substances used in electrical and electronic equipment, while WEEE regulates the disposal of this same equipment.

RoHS COMPLIANCE STATEMENT

As part of our ongoing compliance commitment, Scolmore International Limited (highest parent of the Scolmore Group) as well as its subsidiaries Ovia, Elite Security Products (ESP), Unicrimp and Sangamo, have undertaken a process to identify if any RoHS hazardous substances are contained in the products we supply above the specified limits.

We can confirm that the products we supply conform to the Directive (EU) 2015/863 amendment of the RoHS DIRECTIVE 2011/65/EU, RoHS-Recast, Article 4(1) as well as UK RoHS: and do not contain any of the below-mentioned 10 Hazardous substances above the specified limits.

- Cadmium (Cd): 0.01%
- Mercury: 0.1%
- Lead (Pb): 0.1%
- Hexavalent chromium (Cr6+): 0.1%
- Polybrominated biphenyls (PBB): 0.1%
- Polybrominated diphenyl ethers (PBDE): 0.1%
- Bis(2-Ethylhexyl) phthalate (DEHP): 0.1%
- Benzyl butyl phthalate (BBP): 0.1%
- Dibutyl phthalate (DBP): 0.1%
- Diisobutyl phthalate (DIBP): 0.1%

The information is provided to the best of our knowledge and is based on supplier certifications and our own independent tests.



Mark Flanagan

Technical Director

Scolmore International Ltd

25th November 2025

REACH COMPLIANCE STATEMENT

As part of our ongoing compliance commitment, Scolmore International Limited (highest parent of the Scolmore Group) as well as its subsidiaries Ovia, Elite Security Products (ESP), Unicrimp and Sangamo, have undertaken a process to identify which, if any, substances of very high concern (SVHCs), meeting the criteria set out in Article 57 of the UK and EU REACH Regulations and included on the UK and EU REACH “Candidate List”, are contained within the products we supply to you and in what concentrations.

Additionally, we are monitoring the ongoing amendments to both regulations also with reference to restrictions related to specific applications.

As a result of this exercise, we have received no notification of any breach to the above regulations and we confirm that, to the best of our knowledge, the products we currently supply do not contain any SVHCs included on the Candidate List in concentrations above 0.1 % (w/w) and are compliant with Annex XVII restrictions.

The information is provided to the best of our knowledge and is based on supplier certifications and our own independent tests.

In the event that new information becomes available that would necessitate additional measures we will inform our customers as soon as possible via this webpage.

Disclaimer

All information in this statement is provided to the best of Scolmore Group's and its subsidiaries companies' knowledge at the time of preparation. This statement is provided for information purposes only. Scolmore Group provides this information without warranties of any kind, neither expressed nor implied, including but not limited to warranties for a particular purpose. Scolmore Group does not warrant that the content will be error free. Our declaration is based on the feedback received from our suppliers.

Both UK and EU REACH regulations do not require a full content disclosure and preserve the producer's rights to trade secrets. It is our intention to continue to comply with the spirit of the REACH regulations as well as the letter of the law.



Mark Flanagan

Technical Director

Scolmore International Ltd

25th November 2025