



Robinson Fin Machines

13670 US-68, Kenton, Ohio 43326

REACH Compliance Declaration

We hereby certify that Folded Fin parts manufactured by Robinson Fin Machines, Inc. fully comply with the related requirements of European Union Regulation (EC) 1907/2006 and UK REACH regulations 2020 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH):

1. Under the structure of the REACH regulation, Robinson Fin Machines, Inc. is a manufacturer of “ARTICLES” to our EU and UK customers. We do not manufacture “substances” or “preparations” and our articles do not involve the “intentional release of substances”. Accordingly, we foresee no registration or pre-registration or authorization requirement for the products we supply.

2. Regarding the requirements of Article 33 of REACH: Duty to communicate information on substances in articles. We declare that none of the SVHCs (the Candidate List of Substances of Very High Concern for authorization currently released by ECHA as of January 17, 2023, please refer to Annex 2) is present in Robinson Fin Machines, Inc.’s products (including the packaging) in quantities totaling in a concentration equal or above 0.1%.

3. Regarding the requirements of Article 67 of REACH: A substance on its own, in a preparation or in an article, for which Annex XVII, contains a restriction shall not be manufactured, placed on the market or used unless it complies with the conditions of that restriction. We declare that none of the substances in the condition of restriction is present in Robinson Fin Machines, Inc.’s. products (including the packaging).

As REACH regulation is updated frequently, for the major changes afterwards, such as the addition of SVHC substances into Annex XIV, the addition of restricted substances in Annex XVII, Robinson Fin Machines, Inc. will evaluate the revised in time and update this declaration to reflect these changes.

Annex XIV: <https://echa.europa.eu/candidate-list-table>

Annex XVII: <https://echa.europa.eu/substances-restricted-under-reach>