



Robert Stuart Ltd (RS) REACh Policies and Procedures

Regulatory Monitoring System

RS operates a monitoring system and procedures maintaining regulatory compliance.

This is achieved through regular updates through a number of active routes.

- i) From updates issued by the Surface Engineering Association (the industry trade body) of which RS is an active member.
- ii) Through routine attendance at NADCAP where historically RS has given presentations on the impact of REACh on future manufacturing practices.
- iii) Monitoring of the trade press and published guidance notes from The European Chemicals Agency (ECHA) website [<https://echa.europa.eu/candidate-list-table>]

Determination of REACh impact on RS Manufacturing Capability

Data is published for discussion before a substance is proposed to be added to Annex XIV. At this stage RS considers the potential impact on future manufacturing and where applicable takes action to become involved with the discussion process before the Annex XIV process is initiated. Impacted clients are contacted to advise them of the discussion allowing for client reaction and impact to be ascertained. The suppliers of associated proprietary processes are contacted to determine what action they intend to take as a result of the listing for discussion prior to Annex XIV listing being made formal. A good example was the consideration of cobalt to be added to Annex XIV. Cobalt is used as an alloying agent in hard industrial gold electrodeposited coatings. Discussion allowed the consideration of alternative gold alloy processes and their compliance and capability testing to be investigated with the relevant client base.

Candidate List Tracking

The ECHA website [<https://echa.europa.eu/>] carries updated information on the current position relating to consideration for, and then, implementation of Annex XIV listing. This process has a formal process and requires industrial inclusion in the impact analysis. As a result, there is significant time frame for commentary and implementation allowing RS to approach the situation in a controlled manner.

Annex XIV Listing

The process of monitoring Annex XIV listing has been discussed and is monitored through the [<https://echa.europa.eu/candidate-list-table>]. All of the SVHC's used at RS are operated under the umbrella of the suppliers Authorisation. Where a material is listed in Annex XIV it is possible to search the RS Production Control data base for an impacted client list and associated specifications. This allows discussion with the effected Design Authority to inform them of the potential manufacturing impact.



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The materials actually on the Annex XIV list in use at RS with their associated Authorisation Numbers are:

- a) Chromium Trioxide - 01-2119458868-17-XXXX
- b) Chromic Acid - 01-2119458868-17-XXXX
- c) Potassium Dichromate – 01-21194547992-32-0006
- d) Sodium Dichromate - 01-2119435525-40-XXXX`
- e) Cadmium metal as anodes - 01-2199489023-40

Mass impact (below 0.1% W/W)

Authorisation is required for the use of a substance included in Annex XIV of REACH, either on its own or in a mixture. If the substance is used in a mixture, then exemptions apply to SVHCs below a concentration limit of 0.1 % w/w and they are not required to be disclosed to the client directly.

Robert Stuart can confirm that no goods or services which they supply to customers qualifies as over 0.1% W/W of REACH limit for the declaration of sensitive materials.

Geographical Supply Area

The aerospace industry is a global enterprise and RS will endeavour to meet all international environmental criteria both current and in the foreseeable future irrespective of the UK legislative situation. If BREXIT goes ahead RS will meet the requirements of REACH and any relevant UK domestic legislation.

Communication of Safe Use Data

RS only deals with reputable suppliers who are legally compliant. Where a client requires advise on the safe use of an SVHC, RS supplies clients with the current MSDS from the material supplier for the base chemical in question.

Sub Tier Supply Impact

Robert Stuart can confirm that the only activity sub-contracted activities off site or through sub tiers are vacuum impregnation and shot peening. Neither of these processes is REACH sensitive.

Importation of Banned Annex XIV Substances

RS has no intention of handling, stocking, purchasing or supplying banned Annex XIV substances.

Shipping of Annex XIV Substances

Robert Stuart can confirm that no goods or services which they supply to customers qualifies as over 0.1% W/W of REACH limit for the declaration of sensitive materials. As such there is no requirement to inform clients with a declaration of sensitive materials.



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Focal Points of Contact

The primary points of contact with Robert Stuart Ltd are:

Becky Burns (Health & Safety Manager) becky.burns@robert-stuart.co.uk .

Ian McDonald (Technical Support) ian@flight-process.co.uk .



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Environmental and Safety Regulations Definitions

REACH (Registration, Evaluation and Authorisation of Chemicals):

REACH is a European Union regulation (Regulation no1907/2006) concerning the registration, evaluation, authorisation and restriction of chemicals. It came into force on 1 June 2007. The objective is to manage the risks to human health and the environment linked to the use of chemicals. The Candidate List of Substances of Very High Concern (SVHCs) is revised on a 6-monthly basis, and is available through the ECHA website. As a supplier, you have a legal duty to advise us on whether products you supply contain any of the substances listed in: - the Candidate List (you will have to specify the name and the quantity of these substances if an article, which is incorporated into your products, includes these substances with a mass concentration above 0,1% w/w) - Or in Annex XIV. We would also ask that you advise clients and to manage the potential obsolescence of your products due to REACH so as to limit the supply risks to clients, for whom product substitution is difficult, and where validation periods can be extended.

ROHS (Restriction of Hazardous Substances):

The directive 2011/65/EU (also known as ROHS II) came into force on 21 July 2011. It is applicable to electrical and electronic equipment (see Annex I of the directive) and aims at reducing the use of 6 dangerous substances (see Annex II of the directive), namely lead, mercury, cadmium, hexavalent chromium (chromium (VI)), polybrominated diphenyls (PBB) and polybromo diphenyl ethers (PBDE). The Annex II of the directive, which has been revised in March 2015, currently lists 4 additional substances: Bis(2- ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP). CMR : CMR products are substances with known Carcinogens and/or Mutagens and/or Reprotoxic (ie toxic for reproduction) effects.

Export regulations

The ITAR (International Traffic in Arms Regulations) refers to a set of rules related to the export of articles, data and technologies with a military or space end use. If your product, service, technical data or technology is of US origin and controlled under the ITAR, you must advise us of its USML (United States Military List) rating associated to ITAR.



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The EAR (Export Administration Regulations) deals mainly with products and services you export which have a dual use, meaning that they have a military and commercial use. If your product, service, technical data or technology is of IS origin and not ITAR controlled, then it is controlled under the EAR and you must inform us if it is EAR99 or advise us of its ECCN rating associated to ITAR. All other export regulations applicable by the country you are exporting from must be noted in the form under the heading “Products under export regulations control”.

Product origin - The origin of a product is the country where the product was manufactured or the country in which the last manufacturing step took place. We ask our suppliers to guarantee that no products supplied contain counterfeit parts or materials, and that no products supplied contain so-called conflict minerals. The SEC (US Security and Exchange Commission) has enacted a regulation on 22 August 2012 concerning the transparent and ethical behaviour of companies as regards the following minerals: tin, tantalum, tungsten, gold. The income derived from the mining and transportation of these minerals is a source of funding for armed conflict in the Democratic Republic of Congo (DRC) and neighbouring countries (Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda and Zambia). It is therefore essential to identify the origin of products and components so as to ensure full transparency towards customers and other stakeholders.