To: Whom it may concern

Statement on the use of chemical substances at Ovako

Ovako Sweden AB, Hällefors and Hofors, Ovako Imatra Oy Ab and Ovako Bar AB Smedjebacken and Boxholm (abbreviated "Ovako") is a leading European producer of engineering steel for customers in the bearing, transportation and manufacturing industries. The production is based on recycled steel and includes steel in the form of bars and pre-components.

Ovako's main objective as to the use of chemical substances is that the use of chemicals in the production and operation at Ovako shall at all times be in compliance with applicable European and national chemical legislation.

Subject to the qualifications and reservations set forth below, Ovako makes the following declaration about the use of chemical substances in Ovako's products and where explicitly stated, production processes at the Ovako production sites:

(a) Ovako has implemented a management system, which covers the use of chemical substances throughout the entire organization. One of the objectives of the system is to actively reduce the use of hazardous chemical substances throughout Ovako's production processes;

(b) in the process of designing and developing products as well as in all procurement the Global Automotive Declarable Substance List ("**GADSL**") and REACH Annex XIV and XVII are used as references;

(c) regardless of the intended use of the product, none of Ovako's products contain chemical substances listed in REACH Annex XVII or on the GADSL- list[1] at levels exceeding 0,01 % or the levels set out in the RoHS-directives 2011/65/EU and 2015/863/EU Annex II[2], in the EU Biocides regulation 2012/528 and POP[3] regulation 2004/805/EU and 2019/1021/EU.

(d) substances in Ovako's products which are identified and included on the Candidate List of substances of very high concern (SVHCs) according to article 59 in REACH occur only at concentrations below 0,1 % weight by weight, why Ovako is not obliged to supply information to the SCIP database in accordance with Article 9(1)(i) of the Waste Framework Directive 2008/98/EC.

(e) none of Ovako's products contains any chemical substances on the REACH Annex XIV. Neither are any substances listed in REACH Annex XIV used in the production processes at Ovako.

[1] Including both declarable and prohibited substances.
[2] The RoHS-directives entails rules on the restriction of the use of hazardous substances in electrical and electronic equipment, thus the directive does not formally apply to the products of Ovako. Ovako has however chosen to evaluate and disclose its use of chemical substances in relation to such restricted substances listed in Annex II of the directive.
[3] POP = Persistent Organic Pollutants

(f) none of Ovako's products contain chemical substances listed as High Priority Substances in U.S. Toxic Substances Control Act ("TSCA") and Californian Proposition 65 Safe Drinking Water and Toxic Enforcement Act of 1986. Nickel alloys are not subject to Proposition 65 warning requirements.

(g) Ovako has registered all of its products that must be registered under REACH. The registered products are all by-products, namely mill scale (reg. no. 01-2119458865-23-0031), iron sulphate (reg. no. 01-2119513203-57-0024) and electric arc furnace slag (reg. no. 01-2119485979-09-0033). In relation to all other chemical substances used, Ovako is a downstream user and Ovako's use of such substances fall within an identified use of such substances.

(h) Per- and polyfluoroalkyl substances (PFAS) are not used in the production processes at Ovako and Ovako's products do not contain any PFAS.

(i) There are certain substances covered by the above mentioned legislative acts and lists that cannot physically be measured in steel and others that are difficult to measure due to being present in very low levels. The alloying elements in low alloyed steel are firmly bonded in its chemical matrix. Due to this bonding and to the presence of a protective oxide film the release of any of the constituents is very low and negligible when the steel is used appropriately.

(j) Steel products are considered as articles under the European Regulation (EC) 1907/2006, concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH). All intentionally added alloying elements in Ovako products with the exception of nickel are not classified as hazardous.

The declaration above is subject to the following qualifications and reservations:

(i) The information is true, correct and up to date as the date noted in this statement. The statement will be updated if any changes in the use of chemicals at Ovako or in the legislative acts and it is valid until new update is published on www.ovako.com.

(ii) this statement is made solely for information purposes and shall not, unless otherwise explicitly agreed to in writing, be part of any agreement between Ovako, or any of the Ovako entities separately, and any third party;

On behalf of OVAKO (as defined above)

This Statement has been updated, found true and correct as per 2026-08-20.

Katarina Kangert
Head of Group EHS Ovako