REVISION TABLE

Rev.	Rev. date	Description	Prepared by	Checked by	Approved by
00	10/11/2023	First issuance of Italian version	RASGI	RASGI	COO
01	03/06/2025	Heading format and document classification update	RCQ	RASGI	COO
02	08/08/2025	First English translation and content update	RCQ	RASGI	COO
03	27/05/2026	Insertion of TUV QR codes for ISO certificates (3+1) on document footer	RCQ	RASGI	COO
04	10/11/2026	Insertion of Revision Table	COO	RASGI	COO

REACH STATEMENT FOR LEAD IN ELECTRICAL AND ELECTRONIC EQUIPMENT (EEE) According to EU DIRECTIVE 1907/2006 REACH, article 33

The EU REACH Regulation no. 1907/2006 of December 18th, 2016, and its amendments, concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regarding carcinogenic, mutagenic, or reproductive toxic substances, addresses the production and use of chemical substances, and their potential impacts on human health and the environment. It applies to any product placed on the market inside the EU.

REACH Article 33 defines manufacturers' and importers' obligation to inform their clients if the supplied products or components contain substances of very high concern (SVHC) with a threshold value above 0.1% (1000 ppm) by weight. The SVHC list is updated and extended approximately every 6 months by the EU. The latest version can be found on the *European Chemicals Agency* website: https://echa.europa.eu/candidate-list-table.

In June 2018, metallic Lead was added to the SVHC list with a threshold limit of 0.1%. Lead is a significant and partly indispensable substance in some parts and components used in the electronics industry and is specifically regulated by the EU RoHS Directive for Electric and Electronic Equipment. However, there are RoHS Exemptions (article 5, paragraph 2, Annex III and IV of the EU Directive 2011/65) that allow higher concentrations for certain parts and/or components, such as thermally highly charged components like diodes and MOSFET, or components used on specialized measurement instruments, which very often contain lead above 0.1%. These parts and/or components usually exceed the REACH Article 33 limit for lead, triggering the information requirement.

The results of the evaluation by the European Parliament and the European Council indicate that specific exemptions do not compromise the protection of the environment and human health provided by the EU REACH Regulation no. 1907/2006, in accordance with Article 5 of EU Directive no. 2011/65.

In electronic parts and components, lead subparticles are enclosed within a chip, chipset, or similar, and are not in contact with humans during normal operation. Additionally, brass, copper, and silver alloys can be used as solder components and do not migrate or spread outside the components.

As a downstream user, we comply with the obligation and ask our suppliers to ensure that all chemicals used are managed safely and reported to the European Chemicals Agency (ECHA).

To the best of ESSEGI SYSTEM SERVICE SRL's knowledge and the aforementioned information, our company, as a business that assembles electronic boards and/or parts of electronic equipment, is not included in the list of entities obliged to comply with the REACH regulations related to electronic component manufacturers.

PLACE	DATE	SIGNATURE of CEO *pro tempore*
Creazzo, Province of Vicenza (ITALY)	10/11/2026	**Mr. B. ALESSANDRO**

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