

## Hazardous Substances/Substances of Concern

### To Whom It May Concern:

**Çolakoğlu Metalurji A.Ş do not routinely analyze for presence of following hazardous substances to control the impact of environmentally sensitive material getting into our steel products.**

- Lead, Mercury, Cadmium or Chromium+6,
- Ozone depleting chemicals,
- Environmentally persistent transformer fluids (Polychlorinated Byphenyls, PCBs) of flame retardants (Polybrominated Biphenyls, PBBs, etc.)
- Dibutyl Phthalate (DBP)
- Diethyl Hexyl Phthalate (BBP)
- Diisobutyl Phthalate (DIBP)

Because, they are not a part of the manufacturing process, add no inherent quality to the product, and are typically, if present, below threshold concentrations.

1. Lead and Cadmium, due to manufacturing process, are inherent in the steel as a tramp material and in most cases be present at less than 0.001% per weight. Mercury, if present, would be less than 0.0001% per weight. Chromium is routinely added to certain steel products, but steel manufacturing process prevents the formation of the Cr+6 phase in the final product. Cr+6 may be present at less than 0.001% per weight. This conclusion is confirmed by the TURKAK (Turkish Accreditation Institution.) ROHS test was performed according to Rohs 3 Directive (EU) 2015/863 amending Annex II to Directive 2011/65/EU.
2. Ozone depleting chemicals and environmentally persistent transformer fluids/flame retardants are not a part of the steel manufacturing process and would not survive in the steel manufacturing process. These hazardous chemicals are not added as a part of the post manufacturing process.

Rohs Proposed Maximum Limits were approved by EU council in 2011.

EU Rohs specifies maximum levels for the following 10 restricted substances. The first six applied to the original Rohs while the last four were added under Rohs 3, which took effect July 22, 2019.

Cadmium (Cd):	0,01% in per weight 100 (ppm)
Lead (Pb):	0,1% in per weight 1000 (ppm)
Mercury(Hg):	0,1% in per weight 1000 (ppm)
Hexavalent Chromium (Cr+6):	0,1% in per weight 1000 (ppm)
Poly Brominated Biphenyls (PBB):	0,1% in per weight 1000 (ppm)
Poly Brominated Diphenyl Ethers (PBDE):	0,1% in per weight 1000 (ppm)
Dibutyl phthalate (DBP):	0,1% in per weight 1000 (ppm)
Di(2-ethylhexyl) phthalate (DEHP):	0,1% in per weight 1000 (ppm)
Benzyl butyl phthalate(BBP):	0,1% in per weight 1000 (ppm)
Diisobutyl Phthalate (DIBP):	0,1% in per weight 1000 (ppm)

3. Çolakoğlu Metalurji A.Ş routinely scrutinizes to detect the radioactivity levels of scrap that getting into our steel products (radioactivity detection is accomplished in accordance with “Instruction of Radiation Safety”).

Radiation levels are below threshold concentrations or no inherent quantity for scrap. Typical measured radiation level is less than 20 µrem/hr (specification max:40 µrem/hr)

On behalf of Çolakoğlu Metalurji  
Quality & Process Control Supervisor