Rev. 2 Date 02/10/2026

Reference N.[1] _____

PRODUCT COMPLIANCE CONDITIONS

REACH SECTION "SUBSTANCES, MIXTURES AND ARTICLES" PURSUANT TO REGULATION (EC) NO 1907/2006 (REACH) AND REGULATION (EC) NO 1272/2008 (CLP)

With reference to the Product Compliance Declaration - REACH Section, where applicable, **the supplier/contractor declares**:

1) to be aware that Fincantieri S.p.A. (hereinafter referred to as "Fincantieri"), with reference to Title IX of Legislative Decree 81/2008 and Legislative Decree 102/2020 supplementing Legislative Decree 152/2006, prohibits the introduction into its production processes of substances and mixtures that are classified as carcinogenic, mutagenic or toxic for reproduction (i.e. that present one of the following risk phrases in section 2 of the safety data sheet H340, H350, H350i, H360), or mixtures containing in their composition, substances classified as carcinogenic, mutagenic or toxic for reproduction (i.e. having one of the following risk phrases in section 3 of the safety data sheet H340, H350, H350i, H360);
2) to be aware that Fincantieri, with the aim of reducing the use of substances of concern, prohibits the introduction into its production processes of substances and mixtures that are classified as suspected carcinogens or suspected mutagens, that cause damage to organs even in the event of prolonged or repeated exposure (i.e. that have one of the following risk phrases in section 2 of the safety data sheet H341, H351, H351i, H370, H372), or mixtures containing, in their composition, substances classified in the same way (i.e. having one of the following risk phrases in Section 3 of the safety data sheet H341, H351, H351i, H370, H372);
3) to be aware that Fincantieri, like other European companies, is subject to the compliance obligations imposed by Reg. (EC) 1907/2006 (the so-called REACH Regulation) as amended;
4) to be aware of all obligations pursuant to Reg. (EC) 1907/2006 (REACH) as amended in relation to the supply of substances, mixtures and articles (as defined in Article 3, paragraphs 1, 2 and 3 of the aforementioned Regulation);
5) to be aware that what is written in this clause is a prerequisite for Fincantieri's assessment of the scope of supply or contract;
6) full and continuous compliance with the obligations imposed by Reg. (EC) 1907/2006 (REACH) as amended for **all substances and mixtures** covered by the supply or contract, and in particular:
   a) at the stage of the Request for Offer (hereinafter "RFO"), the transmission and updating of the safety data sheets envisaged in the case of substances and mixtures classified as hazardous, drawn up in accordance with Annex II of the aforementioned Regulation, as referred to in Article 31 of Reg. (EC) 1907/2006 (REACH);
   b) at the Request for Offer stage, the transmission of information for substances and mixtures for which a safety data sheet is not required, as referred to in Art. 32 of Reg. (EC) 1907/2006 (REACH).

   The information transmitted will be based on the configuration assumptions of the bid available at that time.

[1] Purchase Order number and Technical Specification/Documentation number

c) At the Purchase Order (PO) stage, the possible updating of the data in points a) and b) above and the classification and labelling in accordance with Reg. (EC) 1272/2008 as amended (the so-called CLP Regulation), with particular reference to the elements provided for in Article 17 and the provisions of Article 31.

7) To ensure the full and continued compliance of **all items** supplied with the obligations imposed by Reg. (EC) 1907/2006 (REACH) as amended, and in particular:

a) communication to Fincantieri of the absence, or presence, of all the substances on the Candidate List (https://echa.europa.eu/it/candidate-list-table) for the articles to be supplied or the works. If present, the communication must include the identity and further relevant information for the safe use of such substances resulting in a concentration above 0.1% by weight of the individual article (applying this threshold in compliance with the judgment of the European Court of Justice of 10/09/2015 in case C-106/14), as provided for in Art. 33, para. 1 of Reg. (EC) 1907/2006 (REACH), according to the Model Article Declaration in this section;

b) the notification to the European Chemicals Agency (ECHA) of articles containing Candidate List substances in their parts and/or components in concentrations above 0.1% by weight as required by Dir. (EU) 2018/851, transposed in Italy by Italian Legislative Decree 116/2020;

c) full compliance with the prohibitions imposed by Title VIII and Annex XVII of Reg. (EC) 1907/2006 (REACH) as amended on "*restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles*";

8) to act proactively and promptly in communicating any changes in the information previously provided, including changes brought about by the updating of the Candidate List and of Title VIII and Annex XVII referred to in points (a) and (b) of the preceding paragraph;

9) to be aware and to accept Fincantieri's right to request, at its own discretion and at any time, formal and substantial evidence of compliance with the requirements imposed by Reg. (EC) 1907/2006 (REACH) as amended of any items supplied; such evidence may include:

a) dated and countersigned official declarations certifying compliance with the requirements of item 7) of the items supplied;

b) detailed descriptions of lists of purchased items with attestation of conformity with the requirements of item 7) for each component/part of the purchased items;

c) request for prompt feedback on reports of non-compliance (whether emerging from internal audits or inspections) with the requirements set out in point 7);

d) request to perform any chemical analysis and share the relevant analysis reports, on one or more of the items supplied and reported as non-compliant;

e) request to implement corrective actions to resolve the nonconformities detected;

f) Fincantieri's conduct of audits at its administrative and/or production sites to qualify its management of the items provided for compliance with Reg. (EC) 1907/2006 (REACH) as amended;

10) **if the supplier or contractor is established in the European Union or in the European Economic Area**, to actively cooperate in the fulfilment of the obligation set forth in point 7), letter b), by providing any information that may be useful in this regard, including the communication of the "ECHA SCIP numbers" issued by the ECHA Portal, necessary for Fincantieri for any referencing or simplified notifications concerning the articles supplied;

11) to be aware that they have full responsibility for compliance with the requirements set out in item 7) for the articles object of this offer as "supplier of an article" within the meaning of the definition in Art. 3, para. 33 of Reg. (EC) 1907/2006 (REACH) as amended, if the supplier/contractor is established in the European Union or the European Economic Area;

12) **if the supplier or contractor is established outside the European Union or the European Economic Area**, it must provide evidence of the existence of an Exclusive Representative (natural or legal person) as referred to in Art. 8 of Reg. (EC) 1907/2006 (REACH) established in the EU or be fully responsible for compliance with the requirements set out in 7) a) and c) for articles purchased pursuant to the contract/contract;

13) to be aware and explicitly accept that violation of one or more of the contents set forth in one or more of the preceding points shall entitle Fincantieri to claim against the supplier or contractor, also financially, in respect of all damages caused by the violation committed as well as in respect of any greater damage caused to Fincantieri as a consequence of such violation.

    In particular, the supplier or contractor shall submit all information listed in this clause at least 2 (two) months prior to the Factory Acceptance Tests (FAT) or - if no FAT is anticipated - 2 (two) months prior to delivery to the plant in accordance with the development time of the order. If the supplier or contractor fails to send the aforesaid information within the aforesaid deadline or the information is incomplete at the time of the communication, Fincantieri shall be entitled to withhold a portion equal to 20% of the amount of the first invoice until the information is correctly sent. In the event of failure to provide or rectification of incomplete information, Fincantieri shall be entitled to withhold the amount of any further invoice until the information has been correctly provided.

FINCANTIERI

DECLARATION OF ARTICLES FORM - REACH REGULATION

[The communication must be drafted on the supplier's letterhead]

Reference N. _____

The Supplier/Contractor: _____

In accordance with Regulation (EC) 1907/2006 (REACH) of the European Parliament and of the Council of 18 December 2006, declares that: ***[please tick the following options, where relevant]***

☐ the articles, which are the object of the supply, **do not** contain substances included in the Candidate List of SVHC - Substances of Very High Concern (available on the ECHA website at https://echa.europa.eu/it/candidate-list-table), **in a concentration above 0.1% w/w.** In the case of complex articles, this threshold is applicable and complied with for each sub-article (in accordance with the ruling of the European Court of Justice of 10 September 2015 - Case C106/14);

☐ the substances indicated below, object of the scope of supply, **contain** the following substances included in the Candidate List of SVHC (Substances of Very High Concern), which can be consulted on the European Chemicals Agency (ECHA) website at https://echa.europa.eu/it/candidate-list-table), **in concentration above 0.1% w/w:**

Item number supplied to XXX	Name of SVHC substance	Number CAS / EC	Concentration (% w/w)	Localisation of SVHC in the article	Material Category	ECHA SCIP number
List the P/N codes of the items supplied				Indicate which component of the article is affected by SVHC-CL	Indicate the nature of the material in which the candidate list substance is included (brass, ceramic, PVC, ...)	Enter the SCIP number relating to the notification made by the supplier pursuant to Dir. (EU) 2018/851, which can be used for referencing.

In the case of the presence of SVHC substances in the Candidate List listed above, the following measures are recommended for the safe handling of the product as stipulated in Article 33(1) of Reg. (EC) 1907/2006 (REACH) as amended:

Item Number supplied	Information for safe use

Furthermore, we confirm that all articles supplied or processed above comply with the provisions of Title VIII and Annex XVII "Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles" of Reg. (EC) 1907/2006 (REACH) as amended.

Any applicable Annex XVII restriction entries are listed below:

Item number supplied	Applicable restriction item	Any warnings or exemptions regarding the restrictions indicated
	Indicate the number of the applicable restriction entry	Report any comments on the applicability of the conditions of restriction

Sincerely,

Kind regards

Date: _____

[Title, function, first name and surname of the person responsible for communication]

_____

RoHS SECTION “SUPPLIES INCLUDING ELECTRICAL AND ELECTRONIC EQUIPMENT” IN ACCORDANCE WITH DIRECTIVE 2011/65/EU (RoHS II), AS AMENDED

Reference N. _____

With reference to the Product Compliance Declaration - RoHS Section, where applicable, **the supplier/contractor declares**:

1) to be aware of the fact that Fincantieri S.p.A. (hereinafter "Fincantieri"), like other European companies, is subject to the compliance obligations imposed by Dir. 2011/65/EU (RoHS II) as amended, as well as to the relevant Italian transposition legislation;

2) to be aware that the items supplied to Fincantieri are used for the production, assembly and placing on the market of EEE (Electrical and Electronic Equipment) and that they must therefore comply with the obligations on the restriction of hazardous substances set forth in Article 4 of Dir. 2011/65/EU (RoHS II) as amended (including the updates made by Delegated Directive (EU) 2015/863) as well as the relevant Italian transposition legislation;

3) to guarantee full and continuous compliance with the obligations imposed by Dir. 2011/65/EU (RoHS II) as amended, as well as with the relative Italian transposition legislation for all items offered and supplied to Fincantieri, with particular reference to the requirements of restriction of hazardous substances provided for by Article 4 of Directive 2011/65/EU (RoHS II) as amended (including the updates made by the Delegated Directive (EU) 2015/863) for each homogeneous material (as defined in Article 3, paragraph 20 of Dir. 2011/65/EU - RoHS II as amended) from which the articles are made, providing Fincantieri with the RoHS Declaration Form contained in this section;

4) to act promptly in communicating any variation of relevant information provided in the management of the compliance with the requirements imposed by Dir. 2011/65/EU (RoHS II) as amended, for all items offered and supplied to Fincantieri, including variations determined by the regulatory update of the restricted substances as set out in points 2) and 3);

5) to be aware and to accept Fincantieri's right to request, at its discretion and at any time, formal and substantive evidence as to the compliance of the items supplied with the requirements imposed by Dir. 2011/65/EU (RoHS II) as amended, and by the relevant national transposition legislation. Such evidence may include:

   a) official declarations dated and countersigned by the supplier/contractor certifying the conformity of the items supplied with the requirements set out in point 3);

   b) evidence of the actions taken and implemented by the supplier/contractor to substantiate what is contained in the declarations referred to in (a) above;

   c) detailed descriptions of lists of articles supplied with proof of conformity with the requirements set out in 3) for each homogeneous material of the articles purchased;

   d) requests to conduct analytical determinations on one or more of the items supplied (at Fincantieri's discretion) in order to ascertain their compliance with the requirements set forth in item 3) and sharing of the test report of such analyses;

   e) field audits carried out by Fincantieri at its administrative and/or production sites to qualify the management of the compliance of the items supplied in accordance with Dir. 2011/65/EU (RoHS II) as amended, as well as the relative national transposition legislation;

6) to be bound and fully responsible for compliance with the requirements set forth in item 3) for articles supplied to Fincantieri;

7) to be aware and explicitly accept that violation of one or more of the contents set forth in one or more of the preceding points shall entitle Fincantieri to claim against the supplier or contractor, also financially, in respect of all damages caused by the violation committed as well as in respect of any greater damage caused to Fincantieri as a consequence of such violation.

In particular, the supplier or contractor shall submit all information listed in this clause at least 2 (two) months prior to the Factory Acceptance Tests (FAT) or - if no FAT is anticipated - 2 (two) months prior to delivery to the plant in accordance with the development time of the order. If the supplier or contractor fails to send the aforesaid information within the aforesaid deadline or the information is incomplete at the time of the communication, Fincantieri shall be entitled to withhold a portion equal to 20% of the amount of the first invoice until the information is correctly sent. In the event of failure to provide or rectification of incomplete information, Fincantieri shall be entitled to withhold the amount of any further invoice until the information has been correctly provided.

FINCANTIERI

ROHS DECLARATION FORM

[The communication must be drafted on the supplier's letterhead]

Reference N. _____

The Supplier/Contractor: _____

In accordance with European Directive 2011/65/EU (Restriction of Hazardous Substances - RoHS II), supplemented by Commission Delegated Directive (EU) 2015/863 (RoHS III), we hereby declare that: ***[please tick the following options where relevant]***

☐ Electrical and electronic equipment, object of the scope of supply, does **not contain** the substances listed in Annex II "Restricted substances referred to in Article 4(1) and maximum concentration values tolerated by weight in homogeneous materials"[1];

1: Article 3(20) of Directive 2011/65/EU defines homogeneous as a material of uniform composition or a material consisting of a combination of several materials that cannot be divided or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.

☐ the products indicated below, object of the scope of supply, **are covered by the exemptions** provided for in Annexes III and IV of the European Directive 2011/65/EU (RoHS II):

Item numbers supplied		

or

☐ RoHS II Directive does not apply to the subject matter of the Order.

Sincerely,

Kind regards

Date: _____

[Title, function, first name and surname of the person responsible for communication]

_____

IHM SECTION "INVENTORY OF HAZARDOUS MATERIALS" PURSUANT TO IMO RESOLUTION MEPC.405(830) REPLACING IMO RESOLUTION MEPC.379(80) RESULTING FROM "SAFE AND ENVIRONMENTALLY SOUND RECYCLING OF SHIPS" CONVENTION IMPLEMENTED BY REGULATION (EU) NO 1257/2013

Reference N. _____

With reference to the Product Compliance Declaration - Section IHM if applicable, **the supplier/contractor declares**:

1) to be aware that Fincantieri (hereinafter "Fincantieri"), as a company operating in the shipping industry, is subject to the compliance obligations imposed by the 2009 Hong Kong International Convention for the "*Safe and Environmentally Sound Recycling of Ships*";

2) to be aware that the products supplied to Fincantieri, used for production and assembly, must therefore comply with IMO Resolution MEPC 405(83);

3) to hereby guarantee full and continuous compliance with the obligations imposed and in particular the transmission of the *Supplier's Declaration of Conformity* (SDoC) in accordance with the Form set out in this section containing at least the following information:

   a) unique identification code;

   b) name and contact details of the supplier or contractor;

   c) identification of the subject of the Declaration of Conformity (e.g. name, type, model number and/or other relevant supplementary information);

   d) declaration of Conformity;

   e) date and place of birth;

   f) signature (or equivalent form of validation), name and function of the authorised persons acting on behalf of the issuer.

   Each Declaration of Conformity must be accompanied by the *Material Declaration* (MD) issued by each manufacturer in accordance with the Model shown in this section containing at least the following information:

   a) date of the declaration;

   b) *Material Declaration* (MD) identification number;

   c) name of the manufacturer;

   d) product name (common product name or name used by the manufacturer);

   e) product code (for identification by the manufacturer);

   f) declaration of the presence or absence in the product of the materials listed in Annex I and Annex II of Reg. (EU) 1257/2013;

   g) mass of each constituent material listed in Table A and/or Table B in Appendix 1 of the Resolution Guideline if present above the threshold value;

4) to be bound and be fully responsible for compliance with the requirements set forth in item 3) for articles supplied to Fincantieri;

5) to be aware and explicitly accept that violation of one or more of the contents set forth in one or more of the preceding points shall entitle Fincantieri to claim against the supplier or contractor, also financially, in respect of all damages caused by the violation committed as well as in respect of any greater damage caused to Fincantieri as a consequence of such violation.

In particular, the supplier or contractor shall submit all information listed in this clause at least 2 (two) months prior to the Factory Acceptance Tests (FAT) or - if no FAT is anticipated - 2 (two) months prior to delivery to the plant in accordance with the development time of the order. If the supplier or contractor fails to send the aforesaid information within the aforesaid deadline or the information is incomplete at the time of the communication, Fincantieri shall be entitled to withhold a portion equal to 20% of the amount of the first invoice until the information is correctly sent. In the event of failure to provide or rectification of incomplete information, Fincantieri shall be entitled to withhold the amount of any further invoice until the information has been correctly provided.

FINCANTIERI

SUPPLIER'S DECLARATION OF CONFORMITY (SDoC) FORM

Reference N. _____

SUPPLIER'S DECLARATION OF CONFORMITY FOR MATERIAL DECLARATION MANAGEMENT

1 Identification number _____

2 Issuer's name _____

Issuer's address _____

3 Object(s) of the declaration _____

_____

_____

_____

4 The object(s) of the declaration described above is in conformity with the following documents

5 Document No. Title Edition/date of issue

6 Additional information _____

_____

Signed for and on behalf of

_____

_____

(place and date of issue)

7 _____ _____

(name, function) (signature)

This SDoC is to be completed in accordance with IMO Resolution MEPC.405(83) "2025 Guidelines for the Development of the Inventory of Hazardous Materials 11/04/2025" and with Regulation (EU) 1257/2013 of the European Parliament as amended by Regulation (EU) N° 1157/2024 20/11/2013 and should be accompanied by one or more Material Declarations (MD).

This declaration must be filled in English on supplier headed paper

MATERIAL DECLARATION (MD) FORM

Reference N. _____

MATERIAL DECLARATION

<Date of Declaration>

Date	

<MD ID number>

MD ID No.	

<Other information>

Remark 1	
Remark 2	
Remark 3	

<Supplier (respondent) information>

Company name	
Division name	
Address	
Contact person	
Telephone number	
Fax number:	
Email address	
SDoC ID no.	

<Product information>

Product name	Product number	Delivered unit			Product information
		Amount	Unit		

<Material information>

This materials information shows the amount of hazardous materials contained in

	Unit
1	

(unit: piece, kg, m, m^2, m^3, etc.) of the product

Table	Material Name		Threshold Value	Present above threshold value	If yes, material mass		If yes, information on where it is used
				[Yes/No]	Mass	Unit	
Table A (materials listed in appendix 1 of the Convention)	Asbestos	Asbestos	0.1% (*)				
	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	50 mg/kg				
	Ozone depleting substance	Chlorofluorocarbons (CFCs)	no threshold value				
		Halons					
		Other fully halogenated CFCs					
		Carbon tetrachloride					
		1,1,1-Trichloroethane					
		Hydrochlorofluorocarbons					
		Hydrobromofluorocarbons					
		Methyl bromide					
		Bromochloromethane					
	Anti-fouling systems containing organotin	e.g. Tributyltin (TBT)	2,500 mg total tin/kg				
		e.g. Triphenyl tins (TPTs)					
		e.g. Tributyltin oxide (TBTO)					

	compounds as a biocide						
	Anti-fouling systems containing cybutryne		200 mg/kg****				
EU SRR**	Perfluorooctane sulfonic acid (PFOS)***		10 mg/kg				

Table	Material Name	Threshold Value	Present above threshold value	If yes, material mass		If yes, information on where it is used
			[Yes/No]	Mass	Unit	
Table B (materials listed in appendix 2 of the Convention)	Cadmium and cadmium compounds	100 mg/kg				
	Hexavalent chromium and hexavalent chromium compounds	1,000 mg/kg				
	Lead and lead compounds	1,000 mg/kg				
	Mercury and mercury compounds	1,000 mg/kg				
	Polybrominated biphenyl (PBBs)	50 mg/kg				
	Polybrominated dephenyl ethers (PBDEs)	1,000 mg/kg				
	Polychloronaphthalenes (Cl >= 3)	50 mg/kg				
	Radioactive substances	no threshold value				
	Certain shortchain chlorinated paraffins	1%				
EU SRR**	Brominated Flame Retardant (HBCDD)	100 mg/kg				

(*) In accordance with regulation 4 of the IMO Hong Kong Convention, for all ships, new installation of materials which contain asbestos shall be prohibited. According to the UN recommendation "Globally Harmonized System of Classification and Labelling of Chemicals (GHS)" adopted by the United Nations Economic and Social Council's Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (UNSCEGHS), the UN's Sub-Committee of Experts, in 2002 (published in 2003), carcinogenic mixtures classified as Category 1A (including asbestos mixtures) under the GHS are required to be labelled as carcinogenic if the ratio is more than 0.1%. However, if 1% is applied, this threshold value should be recorded in the

Inventory and, if available, the Material Declaration and can be applied not later than five years after the entry into force of the Convention. The threshold value of 0,1% need not be retroactively applied to those Inventories and declarations.

(**) Additional materials to be listed, in accordance with Annex I and Annex II of the European Union Ship Recycling Regulation (Regulation (EU) No 1257/2013). Threshold values taken from the EMSA Best Practice Guidance on the Inventory of Hazardous Materials.

(***) Concentrations of PFOS above 10 mg/kg (0,001% by weight) when it occurs in substances or in preparations or concentrations of PFOS in semi-finished products or articles, or parts thereof equal to or above than 0,1% by weight calculated with reference to the mass of structurally or micro-structurally distinct parts that contain PFOS or for textiles or other coated materials, if the amount of PFOS is equal to or above than 1 μg/m^2 of the coated material.

(****) This threshold value is based on appendix I of the 2022 Guidelines for survey and certification of anti-fouling systems on ships (resolution MEPC.358(78)) for samples taken from wet paint containers.

FINCANTIERI

CM SECTION "CONFLICT MINERALS DECLARATION" PURSUANT TO REGULATION (EU) 2017/821 OF 17 MAY 2017 AS AMENDED.

[The communication must be drafted on the supplier's letterhead]

Reference N. _____

With reference to the Product Compliance Declaration - Section CM, Regulation (EU) 2017/821 of 17 May 2017, as supplemented by Delegated Regulation (EU) 2020/1588 of 25 June 2020, in compliance with the supply chain due diligence obligations for EU importers of ores or metals containing tin, tantalum and niobium, tungsten or gold (3TGs), originating in conflict zones or high risk areas, **the supplier/contractor declares** that: *[please tick the following options, where relevant]*

☐ the above legislation is not applicable to the subject matter of any supply/work

or

☐ procurement is exclusively from certified "conflict-free" smelters or refineries.

The supplier/contractor hereby undertakes to provide documentary evidence of product origin certifications if requested by Fincantieri.

Sincerely,

Kind regards

Date: _____

[Title, function, first name and surname of the person responsible for communication]

_____