MANUFACTURER'S DECLARATION



Translation of original document

Manufacturer's declaration on ship recycling

We hereby certify that our products comply with the following ship recycling regulations:

- Regulation (EU) 1257/2013 on Ship Recycling (EU-SRR)
- Hong Kong Convention (HKC) for the Safe and Environmentally Sound Recycling of Ships (2009)
- SOLAS Convention Part A-1. Regulation 3-5 New installation of materials containing asbestos
- Or equivalent requirements from:
 - United Nations Framework Convention on Climate Change (UNFCCC) (2016)
 - Stockholm Convention on persistent organic pollutants (2004, 2017)

We observe especially the following provisions to implement these requirements:

- IMO Resolution Marpol MEPC.269(68) 2015 Guidelines for the Development of the Inventory of Hazardous Materials (IHM) replacing MEPC.197(62)
- IMO MSC.1/Circ.1379 Unified Interpretation of SOLAS Regulation II-1/3-5 (concerning asbestos in stowage)
- IMO MSC.1/Circ.1426 Unified Interpretation of SOLAS Regulation II-1/3-5 (asbestos; declarations and documentation)
- IACS, International Association of Classification Societies, IACS Rec. 2013/Rev.1 2016, No. 130, page 4 of 5, Annex 2, Declaration of Conformity
- ISO 30005 Ships and marine technology Ship recycling management systems Information control for hazardous materials in the manufacturing chain of shipbuilding and ship operations

SAMSON AG does not use the following substances additionally listed in the EU-SRR above their legal thresholds: hexabromocyclododecane (HBCDD, a brominated flame retardant) and perfluorooctanesulfonic acid and its derivatives (PFOS substance group) within the family of persistent organic substances.

SAMSON does not use the asbestos materials listed in Resolution Marpol MEPC.269(68), Appendix 1, Table A, No. A-1. The threshold value for asbestos determined for all supplied goods to SAMSON is 0 (zero) ppm.

Greenhouse gases, such as chlorofluorocarbons (CFCs), according to Resolution Marpol MEPC.269(68), Appendix 1, Table A, No. A-3, similar substances listed in Table B, No. B-7, and alkanes (C10-C13) according to No. B-9, are chemicals to which trade restrictions apply according to the POP Regulation (EU) 2019/1021. These substances are not used in any products manufactured by SAMSON AG.

Furthermore, our products do not contain any anti-fouling compounds and systems, e.g. made from biocide organo tin compounds according to Resolution Marpol MEPC.269(68), Appendix 1, No. A-4, nor polychlorinated biphenyls (PCB) listed in Table A, No. A-2, nor any radioactive substances listed in Table B, No. B-8.

We point out that we observe most quantity thresholds listed in Table B due to the much stricter requirements of the RoHS Directive 2011/65/EU in applying the IEC 63000 standard:

The substances listed in Table B, No. B-1 to B-6 are identical with the substances listed in RoHS (Directive 2011/65/EU). While RoHS mandates that the limits be observed, IMO Resolution 269(68) only mentions that the exact amounts and positions be specified if the threshold is exceeded.

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In view of our responsibility towards the environment, SAMSON AG strives at implementing the banned material regulations in this case also after changes to legislation. As a result, SAMSON AG permanently puts extensive work into identifying substances that are harmful to the environment and climate.

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