



22.01.2026

Subject: Hazardous Substances / Substances of Concern

To Whom It May Concern:

Iskenderun Demir ve Çelik A.Ş. (ISDEMİR) do not routinely analyze for presence of following hazardous substances to control the impact of environmentally sensitive material getting into our steel products. Only Pb is continuously measured in liquid steel.

- Lead, Mercury, Cadmium or Chromium+6
- Ozone depleting chemicals,
- Environmentally persistent transformer fluids (Polychlorinated Byphenyls, PCBs) or flame-retardants (Polybrominated Biphenyls, PBBs, etc.)
- Dibutyl Phthalate (DBP)
- Diethyl Hexyl Phthalate (DEHP)
- Benzyl Butyl 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 the manufacturing process, are inherent in the steel as a tramp material and in most cases be present at less than 0.001 % per weight for Cd and 0.005 % for Pb. 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 our laboratory and an independent testing laboratory, Intertek Laboratory accredited 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.



İSKENDERUN DEMİR VE ÇELİK A.Ş.

Karşı Mahalle Şehit Yüzbaşı Ali Oğuz Bulvarı No: 1
Payas 31900 Hatay TÜRKİYE
T: +90 326 758 4040 - F: +90 326 758 3838
www.isdemir.com.tr

Trade Registry Number:
Iskenderun-1599

Mersis Number:
0879000967000028

KEP Number:
isdemir@hs01.kep.tr



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.

RoHS Proposed Maximum Limits were approved by EU council in 2019;

SUBSTANCE	LIMITS
Cadmium (Cd)	0.01% (100ppm)
Lead (Pb)	0.1% (1000ppm)
Mercury (Hg)	0.1% (1000ppm)
Hexavalent Chromium (Cr+6) (For non-metal)	0.1% (1000ppm)
Hexavalent Chromium (Cr+6) (For metal)	Colorimetric Result < 0.10 µg/cm ² ≥ 0.10 µg/cm ² and ≤0.13 µg/cm ² > 0.13 µg/cm ² Qualitative Result Negative Inconclusive Positive
Poly Brominated Biphenyls (PBB)	0.1% (1000ppm)
Poly Brominated Diphenyl Ethers (PBDE)	0.1% (1000ppm)
Bis(2-ethylhexyl) phthalate (DEHP)	0.1% (1000ppm)
Butyl benzyl phthalate (BBP)	0.1% (1000ppm)
Dibutyl phthalate (DBP)	0.1% (1000ppm)
Diisobutyl phthalate (DIBP)	0.1% (1000ppm)

The test method and reporting limits for the measurements performed at Intertek Laboratory are as follows:

Testing Item	Testing Method	Reporting Limit
Cadmium (Cd)	With reference to IEC 62321- 5:2013, by microwave or acid digestion and determined by ICP-OES	4 ppm
Lead (Pb)	With reference to IEC 62321- 5:2013, by microwave or acid digestion and determined by ICP-OES	4 ppm
Mercury (Hg)	With reference to IEC 623214:2013/AMD1:2017, by microwave or acid digestion and determined by ICP-OES	10 ppm
Hexavalent Chromium (Cr+6) (For non-metal)	With reference to IEC 62321-7 -2:2017, by alkaline digestion and determined by UV-VIS spectrophotometer	Plastic 25 ppm (PVC Based) / 8,33 ppm (Other)
Hexavalent Chromium (Cr+6) (For metal)	With reference to IEC 62321-7-1:2015, by boiling water extraction and determined by UV-VIS spectrophotometer	0,1 ppm with 50 cm ² (In testing solution)
PBBs/PBDEs	With reference to IEC 62321- 6:2015, by solvent extraction and determined by GC/MS and HPLC	5 ppm
Phthalates	With reference to IEC 62321-8 (111/321/CD), by solvent extraction and determined by GC-MS.	50 ppm



İSKENDERUN DEMİR VE ÇELİK A.Ş.

Karşı Mahalle Şehit Yüzbaşı Ali Oğuz Bulvarı No: 1
Payas 31900 Hatay TÜRKİYE
T: +90 326 758 4040 - F: +90 326 758 3838
www.isdemir.com.tr

Trade Registry Number:
İskenderun-1599

Mersis Number:
0879000967000028

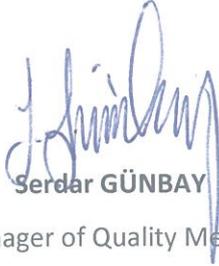
KEP Number:
isdemir@hs01.kep.tr



3. İskenderun Demir ve Çelik A.Ş. (İSDEMİR) holds the "Radiation Measurement System Compliance Certificate" issued by the Nuclear Regulatory Authority of Türkiye (NDK) as a metal scrap importer. İSDEMİR routinely scrutinizes to detect the radioactivity levels of scrap used in steel production. Radiation measurements are carried out in accordance with the "Radioactive Material Detection Instruction in Scraps". The radiation control is conducted using both fixed and portable detectors. Through the installed monitor system, any possibility of contamination in steel products due to radioactive scrap is kept under control. At our facility, there are three portal-type radiation detectors at the entry points for marine and domestic scrap deliveries. These scintillation type detectors comply with IAEA standards and are calibrated annually by an authorized technical service. Metal scrap pieces exceeding the threshold value of 0.4 microSievert/hour, as determined by NDK, are identified and isolated. We assure you that metal scrap that successfully passes through the radiation detectors (no radiation is detected) is being received at the production plant. Therefore, no radiation alarms have been detected in the scrap metal used in our production facility.

If you have any further questions, please do not hesitate to contact us.

Best Regards,



Serdar GÜNBAŞI

Manager of Quality Metallurgy



Mehmet TELLİOĞLU

Act. Executive Vice President Operations

Disclaimer: This declaration is given according to the known production techniques. Isdemir is not responsible for any differences arising from any technical or technological changes.

Contact e-mail: mbilen@isdemir.com.tr , nbostanci@isdemir.com.tr



İSKENDERUN DEMİR VE ÇELİK A.Ş.

Karşı Mahalle Şehit Yüzbaşı Ali Oğuz Bulvarı No: 1
Payas 31900 Hatay TÜRKİYE
T: +90 326 758 4040 - F: +90 326 758 3838
www.isdemir.com.tr

Trade Registry Number:
İskenderun-1599

Mersis Number:
0879000967000028

KEP Number:
isdemir@hs01.kep.tr