

To all Customers

Subject: Regulation (EC) 1907/2006 (REACH)

Dear Customer,

We would like to inform you that in accordance with art. 3 (33) REACH, Spirotech Heat Exchangers Pvt Ltd. is identified as producer and supplier of articles.

To comply with REACH obligations, Spirotech Heat Exchangers Pvt Ltd. has established an internal process based on information transmitted by our value chain, strengthened by a continuous assessment of the trustworthiness of the supplier and of the probability of SVHC-CL (Substances of Very High Concern - Candidate List) being present in materials, parts or sub-assemblies purchased.

In accordance with art. 33 of REACH Regulation, in the Annex I we transmit the currently available information about the SVHC-CL contained in the supplied products in concentration above the 0,1% w/w, calculated as described in the judgement of the European Court of Justice of 10 September 2015 - C106/14. Information referred to the Candidate List of substances of very high concern for Authorization as last updated (<https://echa.europa.eu/it/candidate-list-table>).

Also, we confirm that all the articles we supply are compliant to Title VIII and Annex XVII REACH requirements "Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles".

For any further information, please contact: regulatory@luvegroup.com

Best Regards

Bhiwadi 29/10/2025



Spirotech Heat Exchangers Pvt Ltd.
Dwijesh Gautam
Managing Director

ANNEX 1

Type of parts	Substance name	EC N.	CAS N.
Copper Manifold	Lead	231-100-4	7439-92-1
Copper Distributors	Lead	231-100-4	7439-92-1
Brass Monoblock	Lead	231-100-4	7439-92-1

Product Name (refer at product hierarchy in the invoice)	Copper Manifold	Copper Distributors	Brass Monoblock
BCC	•		
BCO	•		
BEC	•	•	
BEV	•	•	
BHC	•	•	
BHR	•	•	
BWC	•		•

Done

To all Customers

Subject: PRODUCTS' PFAS CONTENT

Dear Customer,

We would like to inform you that Spirotech Heat Exchangers Pvt Ltd. is aware of the proposed new REACH restriction on PFAS submitted by several Member States, as well as the Reporting and Recordkeeping Requirements established by the EPA under the USA TSCA. Based on currently available information, it appears that PFAS will be prohibited in nearly all products and materials.

To gather data regarding the presence of PFAS in supplied products, Spirotech Heat Exchangers Pvt Ltd. will closely monitor the legislative process and, in accordance with the PFAS definition provided by the OECD, will plan a supplier survey accordingly:

"PFASs are defined as fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any H/Cl/Br/I atom attached to it), i.e. with a few noted exceptions, any chemical with at least a perfluorinated methyl group (-CF₃) or a perfluorinated methylene group (-CF₂-) is a PFAS".

Based on the currently available information, we inform you that the products supplied by Spirotech Heat Exchangers Pvt Ltd. to your company do not contain substances that can be identified as PFAS according to the above definition.

For any further information, please contact: regulatory@luvegroup.com

Best Regards

Bhiwadi 29/10/2025



Spirotech Heat Exchangers
Dwijesh Gautam
Managing Director

SPIROTECH HEAT EXCHANGERS PRIVATE LIMITED

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