

To all Customers

Subject: DIRECTIVE 2011/65/EU (RoHS)

Dear Customer,

We inform you that to comply with restrictions defined by art. 4 of Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 (RoHS II), Spirotech Heat Exchangers Pvt Ltd. has established an internal process based the harmonized European standard EN IEC 63000:2018.

Based on the currently available information, we inform you that the products supplied by Spirotech Heat Exchangers Pvt Ltd. comply with the requirements defined by art. 4 of the RoHS directive with respect to the content of the substances listed in Annex II of the directive.

This declaration is referred to Annex II of RoHS II as amended by Delegated Directive (EU) 2015/863. Thus, the maximum tolerated concentrations in the homogeneous materials are:


- Lead (0,1 %)
- Mercury (0,1 %)
- Cadmium (0,01 %)
- Hexavalent Chromium (0,1 %)
- Polybrominated biphenyls (PBB) (0,1 %)
- Polybrominated diphenyl ethers (PBDE) (0,1 %)
- Bis(2-ethylhexyl) phthalate (DEHP) (0,1 %)
- Benzyl butyl phthalate (BBP) (0,1 %)
- Dibutyl phthalate (DBP) (0,1 %)
- Diisobutyl phthalate (DIBP) (0,1 %)

When the compliance is obtained due to the applicability of specific exemptions, information is provided in Annex.

For any further information, please contact: [regulatory@luvegroup.com](mailto: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.	RoHS exemptions Annex III
Copper Manifold	Lead	231-100-4	7439-92-1	6(c)
Copper Distributors	Lead	231-100-4	7439-92-1	6(c)
Brass Monoblock	Lead	231-100-4	7439-92-1	6(c)

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



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