

Subject: Health, Safety, Security and Environmental (HSSE) Progress Report
Ref: DD-004
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Dear Customer,

Doedijns is committed to active environmental awareness and the occupational health and safety of its employees and the users of its products. We demonstrate this commitment through our compliance with European and national health, safety, security and environmental legislation. This letter informs you about the current status of Doedijns B.V.b.v. concerning to the (most) relevant health, safety and environment-related laws and standards, as they pertain to our activities and products. All relevant laws and standards, along with also the HSSE-related requirements of our stakeholders, are registered centrally and are subject to regular reviews. Other legal requirements are less relevant or, based on current information, not applicable to the activities or products of Doedijns.

Standards

The management system of Doedijns complies with the SCC (VCA) standard, the standard in the Netherlands for achieving occupational health and safety. To increase awareness and minimize our environmental footprint, Doedijns is certified to the international environmental standard ISO14001.

Dutch legislation

Doedijns meets the requirements of the Dutch national laws and practice guidelines for the protection of its employees (labor law) and the environment. If Doedijns is visited by a governmental environment department, any possible shortcomings are addressed accordingly.

European legislation

European regulations are directly applicable to all countries in the European Community, while the European directives must be incorporated into national legislation. The current status in relation to relevant European laws applicable to Doedijns is outlined below (in order of reference number).

Regulation 1257/2013 - amending Regulation (EC) No 1013/2006 and Directive 2009/16/EC - and IMO Guidelines Mepc 269.(68): Ship Recycling

From December 31st, 2020, this regulation requires any EU-visiting ship above 500GT to have a certified and maintained IHM Part I (Inventory of Hazardous Materials in structure and equipment) on board. The IHM Guidelines of IMO (Res. MEPC 269(68)) apply to non-EU-flagged ships (IMO-IHM") whereas for EU-flagged ships an EU-IHM", covering two more substances, is required. The Port States of the EU are obliged to control and enforce this. This regulation is not directly relevant to Doedijns as it applies to ship owners. At the request of any customer, a declaration is requested from the applicable supplier.

Regulation 1907/2006 - including Regulation 2020/878 amending Annex II & Regulation 2020/1149 amending Annex XVII - concerning Registration, Evaluation, Authorization and restriction of Chemicals (REACH)

This regulation is about chemical substances or mixtures that contain any substances of very high concern (SVHC) according to the Candidate List, annex XIV (Authorisation List), or annex XVII (Restricted Substance List) with a concentration higher than 0.1%. Doedijns is a downstream user; therefore the products traded by Doedijns do not require registration according to this regulation.



The latest versions of the Material Safety Data Sheets are evaluated regularly to ensure proper use of these products in our own facilities by taking the necessary measures for our employees, such as the storage of chemicals, the use of personal protection equipment and availability of appropriate first aid resources. Suppliers are made aware of their obligations through revised purchasing conditions. If - based on the information received from our suppliers, a product contains substances of very high concern (SVHCs) according to the REACH Candidate List in a concentration above 0.1% weight by weight (w/w) and/or substances with restrictions according to REACH Annex XVII, our customers are informed through additional text on the packing slip and the invoice. If requested by any customer, SVHC information relating to our products will be provided within 45 days (similar to the 'Inventory of Hazardous Materials' (IHM) from the Ship Recycling Regulation).

Directive 1999/92/EC: ATEX 153 Directive

This directive describes the minimum requirements to improve the safety and health protection for workers who are potentially at risk from explosive atmospheres. By drafting and regularly reviewing the so-called Explosion Safety Document, the requirements of this directive are incorporated into the management system of Doedijns.

Directive 2006/42/EC: Machinery Directive

This directive pertains to the provision of safe (completed and uncompleted) machines, lifting equipment and safety components. All related documentation is part of the Engineering department page on the intranet to ensure compliance during the engineering phase. Training and education for (new) personnel at the engineering departments is organized. From January 2027, this directive will officially be replaced by the Machinery Regulation (EU) 2023/1230 and Doedijns will make the necessary preparations in a timely manner for compliance with the regulation.

Directive 2008/98/EC: Waste Framework (WFD)

This new directive ensures all companies supplying the EU market with articles containing substances of very high concern (SVHC) on the Candidate List in a concentration above 0.1% weight by weight (w/w), submit information on these articles. This directive is effective since 5 January 2021. The information is reported to ECHA by means of the so-called SCIP database. The aim of the database is to ensure that information on hazardous chemicals is available throughout the life of products and materials, even at the waste stage. The information in the database is then made available to waste operators and consumers. Doedijns has made the requirements of this directive part of a central register to implement this directive according to the national legal requirements. ECHA is informed about any products in which the concentration is exceeded; customers are informed through additional text on the packing slip and the invoice and suppliers are made aware of their obligations through revised purchasing conditions. If applicable, ECHA will be updated.

Directive 2011/65/EU (RoHS 2) – including delegated Directives amending RoHS Annexes like 2015/863 (RoHS 3): Restriction of Hazardous Substances in Electrical and Electronic Equipment

This directive refers to electrical and electronic equipment (EEE) - including lighting – and restricts the use of ten substances with a concentration above the specified weight threshold in the homogeneous material: Lead (Pb) 0.1%, Mercury (Hg) 0.1%, Cadmium (Cd) 0.01%, Hexavalent Chromium (CR VI) 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%, Diisobutyl phthalate (DIBP) 0.1%, Dibutyl phthalate (DBP) 0.1%. All products with an electrical and electronic component, unless



specifically excluded, have to comply with these restrictions. Based on the current information, this directive is not applicable to the products of Doedijns. At the request of any customer we will provide detailed information relating to our products. A standard form has been prepared for this.

Directive 2014/29/EU: Simple Pressure Vessels

The scope of this directive includes vessels manufactured in series and subjected to an internal gauge pressure greater than 0.5 bar, made to contain air or nitrogen, and are not intended to be fired. The requirements of this directive as part of the generic document regarding all relevant CE directives to adapt our management system to the requirements of the PED directive.

Directive 2014/68/EU: Pressure Equipment Directive (PED)

This directive sets out the standards for the design and fabrication of pressure equipment. All related documentation is part of the Engineering department page on the intranet to ensure compliance during the engineering phase.

Regulation (EU) 2017/821 and Section 1502 of the Dodd Frank Act: Conflict Minerals

In 2010, the US passed Section 1502 of the Dodd Frank Act. This requires U.S. publicly traded companies to monitor their supply chains for tin, tungsten, tantalum and gold, if these may come from Congo or its neighboring countries, take steps to address any risks and report their efforts annually to the U.S. Securities and Exchange Commission. Exchange Commission (SEC). Companies are not encouraged to stop sourcing raw materials from this region, but they must demonstrate that they are conducting due diligence to ensure they are not financing armed groups or human rights abuses. The EU regulation came into effect in 2021 and requires companies to carry out due diligence on their supply chains to ensure that they are not sourcing conflict minerals from areas where human rights abuses are taking place. The regulation applies to all EU-based importers of tin, tantalum, tungsten and gold. Based on the current information, 'conflict minerals' are not used in the products of Doedijns. Upon request from any customer, we will provide detailed information relating to our products. A standard form has been prepared for this.

Final

At this moment, we are, in all conscience, in compliance with the applicable health, safety and environmental legislation. We trust we have sufficiently informed you with this letter. If you have any further questions, please do not hesitate to contact us. Upon request from any customer, we will provide detailed information relating to our products.

Sincerely,

John Heijboer

QA/HSE Manager

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