

DOCUMENT TITLE

CONFLICT MATERIALS TRADE ACT COMPLIANCE STATEMENT
(DOC21)

DOCUMENT REFERENCE NUMBER

DOC21

REVISION	DATE	AUTHORIZED BY	COMMENTS
01	09/08/16	N. GIBBONS	Added to QMS via DCR446
02	02/02/17	N. GIBBONS	DC R452
03	24/07/21	H. MORAN	SEE DCR No 545



Conflict Minerals Trade Act Compliance Statement

This Statement details the position of Gwent Cables Ltd in response to the Dodd-Frank Wall Street Reform and Consumer Act 2010 - Section 1502 regarding Conflict Minerals (known as '3TG' – Tantalum, Tin, Tungsten and Gold).

As a privately owned UK company Gwent Cables Ltd is not subject to SEC reporting. However we support its aims and objectives completely and will engage diligently with our customers regarding their disclosure obligations.

Therefore we are committed to:

- Not knowingly buying products and materials containing Conflict Minerals directly from mines and smelters located in Conflict Zones.
- Requiring our suppliers to exercise due diligence and ensure that any Conflict Minerals contained in the products and materials supplied to Gwent Cables Ltd do not originate from Conflict Mines.
- Requiring our suppliers to comply with the Dodd-Frank regulation <http://www.sec.gov/rules/final/2012/34-67716.pdf> and provide all necessary declarations.
- Requiring that our suppliers respond in a timely manner to our requests for evidence of compliance. Suppliers' willingness to comply with this initiative will be a factor in our sourcing decisions.
- Engaging diligently with our customers regarding their disclosure obligations under the Act.
- Ensuring that the requirements are reflected in our Purchasing Terms and Conditions

EU guidance regarding compliance to the Conflict Minerals Regulation can be found at https://ec.europa.eu/trade/policy/in-focus/conflict-minerals-regulation/regulation-explained/index_en.htm and we have used some aspects of this guidance in constructing this Position Statement document.

Signed by:

David Daniels – Technical Manager

July 2021

Gwent Cables Ltd, Unit 15, Llantarnam Park, Cwmbran

DOCUMENT TITLE

ROHS COMPLIANCE STATEMENT
(DOC23)

DOCUMENT REFERENCE NUMBER

DOC23

REVISION	DATE	AUTHORIZED BY	COMMENTS
01	09/08/2016	N.GIBBONS	Added to QMS via DCR 446
02	02/02/2017	N.GIBBONS	DCR450
03	10/06/2019	S.RANDALL-SMITH	DCR459
04	07/08/21	H. Moran	See DCR No 547

RoHS Compliance Statement

The RoHS (Restriction of Hazardous Substances) directives 2002/95/EC, 2011/65/EU and 2015/863 restrict the use of certain substances in electronic components and electrical equipment with the European Market.

We have customers in markets where RoHS compliance is not required and some where it is.

It is the responsibility of our customers to inform us if the goods they wish us to supply must be RoHS compliant. In these cases we will take all reasonable steps to ensure that only RoHS compliant materials are received from suppliers and included in the product supplied to customers.

The requirement for RoHS compliant material is stated in our Terms and Conditions of Purchase and suppliers are made explicitly aware of it by its inclusion in our Contract and Order documentation. It is the responsibility of our suppliers to inform us if any product they supply to us contains a substance which is prohibited or requires declaration under the RoHS regulations.

We rely on the accuracy and validity of supplier responses to determine whether a reportable Substance is present in the goods supplied to us. Should we be notified of the presence of a substance requiring declaration under the RoHS regulations we will take the following actions:

- Attempt to find an alternative item that does not require declaration
- Inform our customer and await further instruction

We have attached a useful explanatory document from NMRO which gives further details on the requirements of RoHS and which forms the basis of our statement on the matter. The document can be downloaded at www.gov.uk/nmro/rohs.

Signed by: 

David Daniels – Technical Manager

July 2021

DOCUMENT TITLE

WEEE COMPLIANCE STATEMENT
(DOC24)

DOCUMENT REFERENCE NUMBER
DOC24

REVISION	DATE	AUTHORIZED BY	COMMENTS
01	90/08/2016	N GIBBONS	Added to QMS via DCR446
02	02/02/2017	N GIBBONS	DCR451
03	08/07/2021	H. Moran	See DCR No 548



WEEE Compliance Statement

Gwent Cables Ltd is not classed as a 'Producer' in respect of the WEEE directive (2012/19/EU) and The Waste Electrical and Electronic Equipment Regulations 2013 and subsequent amendments and is therefore not required to register with a Producer Compliance Scheme.

Whilst we have no formal compliance obligations under the scheme we endeavor to act in an environmentally responsible manner at all times and will aim to provide any assistance and co-operation with customers, suppliers and other agencies where it is within our capability to do so.

We have attached a useful explanatory document from the UK Government which gives further details on the requirements of WEEE and which forms the basis of our statement on the matter. The document can be viewed at <https://www.gov.uk/guidance/electrical-and-electronic-equipment-eee-producer-responsibility#eee-producer-definition>.

Signed by:

David Daniels – Technical Manager

July 2021

Gwent Cables Ltd, Unit 15, Llantarnam Park, Cwmbran, NP44 3AX.

www.gwentcables.com

DOCUMENT TITLE

REACH COMPLIANCE STATEMENT
(DOC22)

DOCUMENT REFERENCE NUMBER
DOC22

REVISION	DATE	AUTHORIZED BY	COMMENTS
01	09/08/2016	N. GIBBONS	Added to QMS via DCR446
02	02/02/2017	N. GIBBONS	DCR453
03	26/07/21	H. Moran	See DCR No 546
04	25/10/21	H. Moran	See DCR No 566
05	31/01/2022	H. Moran	See DCR No 578

REACH Compliance Statement

The European Union's REACH Directive (EC 1907/2006) is designed to regulate the Registration, Evaluation, Authorization and Restriction of Chemical Substances. REACH legislation was finalized in December 2006 and has been in effect since June 2007.

As a manufacturer of products categorised as 'Articles' we are exempt from any requirement to register under REACH regulations. It is the responsibility of our suppliers to inform us if any product they supply to us contains a substance requiring declaration under the latest candidate list dated 17 January 2022. This is stated in our Terms and Conditions of Purchase and suppliers are made explicitly aware of it by its inclusion in our Contract and Order documentation.

We rely on the accuracy and validity of supplier responses to determine whether a reportable Restricted Substance is present in the goods supplied to us. To date no such items have been reported to us so we conclude that all of our products are compliant under the REACH Directive.

Should we be notified of the presence of a substance requiring declaration under the REACH regulations we will take the following actions:

- Attempt to find an alternative item that does not require declaration
- Inform our customer
- Consider registration where appropriate

We have attached a useful link to HSE which gives further details on the requirements of REACH and which forms the basis of our statement on the matter. The requirements of REACH can be accessed at <https://www.hse.gov.uk/reach/index.htm>

Signed by:



David Daniels – Technical Manager

21st October 2021

Gwent Cables Ltd, Unit 15, Llantarnam Park, Cwmbran, NP44 3AX.

www.gwentcables.com