



electrocube

... it's a part of what we do.

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Since 1961

11/4/16

To our Customers, purchasing Electrocube, Seacor, and F-Dyne / Southern Electronics products -

Regarding the REACH regulation

Dear Customer,

Electrocube understands the requirements imposed by the European Community Regulation EC 1907/2006, on the Registration Evaluation Authorization and Restriction of Chemicals, commonly known as "REACH", and has implemented plans to comply with those requirements, and our obligation to provide product content information.

The REACH regulation classifies all material as either, an article, substance or preparation. Typical Electrocube products / finished goods are comprised of a combination of solid materials, e.g. fasteners, electrical and mechanical components, wire, insulation, paper and plastic products, cured adhesives and encapsulant materials, etc., and are classified as *articles* under the REACH regulation. See *EU REACH Regulation Article 3(3)*.

Electrocube does not anticipate need to REACH "register" our finished products, which as articles or constituent substances, will not be produced and placed on the European marketplace in amounts exceeding 1 metric ton annually, and which are classified as articles without intended release of constituent substances under normal or reasonably foreseeable conditions of use. See *EU REACH Regulation Article 7(1)*.

Electrocube does not anticipate need to provide REACH Agency "notification" for our finished products, which as articles or constituent substances, will not be produced and placed on the European marketplace in amounts exceeding 1 metric ton annually, which are estimated to not contain proscribed SVHC content in excess of the 0.1% weight by weight limit, and which are otherwise classified as articles without intended release and/or human or environmental exposure of (proscribed) constituent substances under normal or reasonably foreseeable conditions of use (including disposal). See *EU REACH Regulation Article 7(2-3)*.

The REACH Regulation identifies by way of Annex XVII, restrictions on use of certain substances, which are primarily consolidation of restrictions previously imposed by numerous separate European Union Directives. Annex XVII as initially released indicated 58 basic substance use restrictions, and currently indicates 105 specific restriction entries by release of the Annex XVII List of Restrictions Table by the European Chemical Agency (ECHA) on December 6, 2013. In many cases these restrictions are application specific, and Electrocube has evaluated our products to be in-compliance with the content restrictions imposed by Annex XVII. Electrocube continues to monitor periodic amendments to Annex XVII to assure continuing compliance.

The REACH Regulation imposes additional requirements, which obligate Electrocube and our customers to provide information on composition of articles, *confirming absence* / disclosing content of Substances of Very High Concern (SVHCs), and to provide safe-use information when present in amounts exceeding 0.1% weight by weight. See *EU REACH Regulation Article 33*. The REACH SVHC listing as originally released included 15 substances, with fifteen subsequent amendments / additions, and has most recently been revised from 168 to 169 substances by release of the current SVHC Candidate List by the ECHA on June 20, 2016. Additionally 31 of the 168 SVHC have been placed on the EC 1907/2006 Annex XIV Authorization List (imposing specific usage restrictions) dated August 19, 2014.

REACH SVHC content disclosure became a requirement / provision of Electrocube purchase orders / procurements in January 2009. As such, and unless otherwise noted as an exception, Certifications of Compliance received with purchased product imply "REACH SVHC-FREE" condition. It remains an obligation of Electrocube and is a stated requirement that our suppliers remain actively aware of revisions / additions to the list of SVHCs on an on-going basis, and that Certifications of Compliance, or Material Content Certifications provided reflect the REACH SVHC Candidate List con-current with the provided certification documentation.

Providing an accurate response to our REACH obligation requires that Electrocube diligently assess / confirm the potential for new SVHC content as the Candidate List is revised, for a wide range of base-level materials and components, so that a comprehensive higher-level SVHC content may be accurately determined and reported when and if required, for a broad range of Electrocube finished product types, styles and complexities.

With release of the initial REACH Candidate List of SVHCs in October 2008, and since January 2009 Electrocube has been working to obtain / maintain material content certifications. As the REACH SVHC Listing continues to be periodically revised to include additional substances over-time, it is prudent that we request updated material content declarations / confirmations of product status from our suppliers.

To the present and best of our knowledge, and based upon the information available to us from our suppliers, Electrocube does not knowingly specify, purchase or utilize any of the 169 SVHCs Candidate Listed as of and prior to Amendment June 20, 2016 (in excess of the 0.1%W/W requirement) in processing, raw materials and components, in the construction and manufacture of active Electrocube standard catalog and custom design products.

In concert with explicit requests for additional content certification, we continue to rely to an increasing extent upon simple communication with our supply base of SVHC Candidate List additions as updates are released, with a reminder that our suppliers are obligated to disclose SVHC Content by contractual requirement. We must to some extent consider that product is compliant as "REACH SVHC-FREE" unless notified explicitly otherwise.

Electrocube sources of supply are required to provide explicit SVHC content disclosure when present in excessive amounts (as %w/w), but are not otherwise required to provide explicit comprehensive product content disclosure. Electrocube will typically utilize / rely upon simple "REACH SVHC-FREE" certifications of compliant content, and material / product certifications required by and provided by purchase order provisions. Electrocube will provide explicit SVHC content disclosure when present in excessive amounts (as %w/w), but will not otherwise provide explicit comprehensive product content disclosure.

Electrocube's intention will be to inform our customers regarding the REACH status of our products, by way of our company web-site www.electrocube.com, and by reply to specific requests, to the extent we have data available. In the unlikely event that products provided by Electrocube do include some content of SVHC, Electrocube will identify the applicable product part / series number, the SVHC with CAS & EC Nos., and parts by weight percentage. Electrocube will endeavor to identify and implement use of acceptable alternative REACH SVHC-FREE replacement content when necessary and to the extent able, and advise our customers regarding anticipated schedule and accomplishment of these efforts.

Your Electrocube contact for REACH information is your Customer Service Representative, at (909) 595-4037, and esales@electrocube.com.

Thank you for your patience as Electrocube works diligently to re-confirm the REACH SVHC content as requirements periodically expand, and in reaction to your specific requests for information / confirmation.

Yours sincerely,

Electrocube Incorporated



L. Clay Parrill - President