

12/5/16

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

Regarding the RoHS regulation (and Pb-Free)

Electrocube understands the requirements imposed by the European Union (EU) "Reduction of Hazardous Substances" Directive 2011/65/EU of 8 June 2011 commonly known as "RoHS2", and has implemented and maintains compliance with those requirements, and our obligation to provide product content information.

It is Electrocube's intention to supply our products in a configuration that meets the significant material content / environmental compliance requirements of our customers to the greatest extent able, and we support ecologically and morally responsible reduction in the use of hazardous substances.

Electrocube provides the following commentary, indicating our understanding of the requirements imposed by EU RoHS Directive, subsequent Amendments, and associated EU Commission Decisions / Delegated Directives and Guidance documents, and further explaining our current RoHS compliant status, company position regarding numerous RoHS and lead-free implementation issues, and addressing specific issues commonly elevated by our customers.

REQUIREMENT OVERVIEW AND ISSUES –

The requirements for RoHS Compliance are defined by:

EU Directive 2002/95/EC of 27 January 2003, Repealed 3 January 2013 (per EU Directive 2011/65/EU, Article 26)
EU Directive 2011/65/EU of 8 June 2011 (RoHS 2.0 / Recast)

Subsequent Amendments and Corrections through to Commission Delegated Directive (EU) 2016/585 of 12 February 2016, relative to restrictions and exemptions applicable to use of (4) heavy metal substances (Pb, Hg, Cd and Cr⁺⁶), (2) flame retardant substances (PBB and PBDE), and including Commission Delegated Directive (EU) 2015/863 of 31 March 2015, adding (4) phthalate substances (DEHP, BBP, DBP and DIBP – *effective 22 July 2019*), per Annex II Restricted Substances List, per Article 4(1), now totaling (10) restricted substances.

EU Commission Decision 768/2008/EC of 9 July 2008, Annex II, Module A.

The original EU RoHS Directive, imposed restrictions (ban) on the content of (4) "heavy metals"; Lead (Pb), Mercury (Hg), Cadmium (Cd), Hexavalent Chromium (Cr⁺⁶), and (2) flame retardants; Polybrominated Biphenyl (PBB) and Polybrominated Diphenyl Ether (PBDE); considered (un)acceptable for use in electrical and electronics products placed on the market in Europe effective July 1, 2006. A maximum concentration value (MCV) of 0.10% (1000 PPM) for PBB, PBDE, Hg, Cr⁺⁶, and Pb, and 0.01% (100 PPM) for Cd, by weight in homogenous materials was determined to be acceptable content. Subsequent EU Commission Decision and Guidance documents provided additional definitions, directions and requirements for implementation and methodology of content measurement.

The RoHS (2.0 Recast) Directive has recently been revised to add (4) phthalate substances (*ban effective 22 July 2019*) Bis(2-ethylhexyl) Phthalate (DEHP), Butyl Benzyl Phthalate (BBP), Dibutyl Phthalate (DBP), and Diisobutyl Phthalate (DIBP), for a current total of (10) restricted substances. A maximum concentration value (MCV) of 0.10% (1000 PPM) for DEHP, BBP, DBP and DIBP by weight in homogenous materials shall be acceptable. Use of these substances has been otherwise restricted by the EU REACH regulation since approximately year 2008-2010, so that coincident REACH SVHC-Free Certification will cover these added substances.

Annex's I, III & IV of the RoHS / RoHS2 Directive indicate numbers of specific usages, and general classes of end-item material, component, and product applications which are exempted from the requirements of the RoHS Directive, in which use of the otherwise restricted substances may be acceptably permitted within alternative allowances. Over time and ongoing, the RoHS and RoHS2 Directives have received numerous revisions regarding the addition, specification, and deletion of Exemptions.

The RoHS Regulation imposes the requirement that Electrocube and our upstream customers provide information on product composition, *confirming absence* / disclosing content of Restricted Substances exceeding specific acceptable limits, and any exemptions utilized in the certification of product.

Coincidentally other “green” initiatives alternatively mandated development of “Pb-Free” (lead-free) products. RoHS compliance includes requirements for lead-free content, however the electronics industry has separated the two requirements, with somewhat different rationale, definitions and requirements as applicable manufacturing processing are affected. For the purpose of this communication “RoHS compliant” shall be implied mean to “lead-free” as these have been dual / parallel goals, to be coincidentally achieved. The requirements for Pb, Pb-Free and other identification are defined by such as: IPC/JEDEC J-STD-609B April 2016.

The electronics industry considers that products shall receive multiple compliance / status designations, indicating RoHS compliance, Pb-Free (lead-free) condition (if applicable), Pb-Free category of terminal finish and Pb-Free process temperature compatibility, etc. Per industry standards J-STD-609B, the applicable definition of the term “Pb-Free” (lead-free) is: “Having a maximum Pb concentration value of 0.1% by weight in component terminal finishes and attachment solders. The Pb-Free designation should not be used for RoHS Compliant product containing Pb in excess of 0.1% by exercise of specific RoHS Exemptions.

Over-time electronics industry organizations have proposed standards for material content declaration, with disclosure extending beyond RoHS substance content (up to 100% “Full Material Declaration”) and including numbers of the product’s processing specifications. “RoHS Compliance” has evolved into a broad issue of “Environmental Compliance / Full Material Content Declaration / Disclosure”.

COMPLIANCE CERTIFICATION (RATIONALE & SCOPE) -

With release of the initial RoHS Annex II Restricted Substance List July 2005, and since October 2005 (as the Annex II List is revised) Electrocube has been working diligently to assess potential for restricted content, and to obtain and maintain material content certifications for base-level materials and components applicable to a broad range of Electrocube finished product types, styles and complexities; confirming (absence of) RoHS restricted substances.

Electrocube self-certifies products as RoHS Compliant, based upon assurances obtained from our suppliers certifying that the materials and components provided by them are RoHS Compliant, from which it follows that compliant materials, components and processing produce a compliant finished product. Electrocube does not directly utilize destructive testing / lab analysis of materials, component parts, finished components or assemblies to confirm specific content of RoHS restricted substances.

Compliance with the material content restrictions and disclosure requirements of initial EU RoHS Directive 2002/95/EC, and subsequent EU Commission Decisions / Amendments (EU Directive 2011/65/EU) became a requirement / provision of Electrocube purchase orders / procurements in January 2006, unless specifically acceptable and contracted otherwise / noted as an exception. As such, Certifications of Compliance received with purchased product indicate “RoHS Compliant” condition. It is an obligation and a stated requirement that our suppliers remain actively aware of revisions / additions to the RoHS Directive and associated Annex II Restricted Substances List on an on-going basis, and that Certifications of Compliance, or Material Content Certifications provided reflect the RoHS Annex II List con-current with the provided certification documentation.

In concert with explicit requests for content certification, we continue to rely to an increasing extent upon awareness communication with our supply base of RoHS Annex II Restricted Substances List additions as updates are released, with a reminder that our suppliers are obligated to disclose RoHS Restricted Substance content by contractual requirement. We must to some extent consider that product supplied is “RoHS Compliant” unless notified specifically otherwise.

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

The manufacturing process related designations / concerns pressed by the electronics industry are predominantly applicable to surface mount component processing at the increased temperatures required by lead-free processing, and less / not applicable to typical Electrocube products, appropriate for wired-in hand-soldered installation to electronics assemblies, or wave and hand soldered installation to circuit card assemblies having plated through hole technology.

Electrocube cannot respond to full range of widely variable requests for product compliance information and reporting received. Electrocube currently provides RoHS compliance information in-general via our web-site (www.electrocube.com). Electrocube will provide simple material declarations / statements / certifications of RoHS compliance for a product series in general, and for specific products on request. Your Electrocube contact for RoHS compliance information is your Customer Service Representative, at (909) 595-4037, and esales@electrocube.com.

Electrocube's current level of product certification capability indicates product compliance in accordance with the requirements of RoHS Directive 2011/65/EU and Amendments only, confirming absence of (10) restricted substances, providing specific "yes/no" compliance responses, potentially indicating RoHS Exemptions applicable to a limited number of special circumstances and providing specific additional processing information. Electrocube will in some cases be willing to utilize customer provided certification / reporting formats. Electrocube will provide explicit disclosure of RoHS restricted substance content when present in excessive amounts (as %w/w), but will not otherwise provide comprehensive and explicit "Full Material Declaration" product content disclosure.

In the event that materials or components utilized in Electrocube products previously represented to be RoHS Compliant are determined to be RoHS Non-Compliant, due to revised availability, sourcing and/or additions to the list of restricted substances; the affected products will be accurately de-certified as RoHS Non-Compliant, and Electrocube will responsibly advise our customers when it affects product delivered, or delivery of product, and our anticipated schedule to identify and implement use of acceptable alternative RoHS Compliant materials and components, and deliver RoHS Compliant product.

CONTENT COMPLIANCE DETAIL –

Standard Products shall be broadly / generally defined as: active Electrocube (including Seacor and F-Dyne/Southern Electronics) standard catalog Capacitor and RC Network products – excluding a limited number of inactive or specialized catalog products, and custom product configurations.

Electrocube intends to supply our "Standard Products" in full compliance with the material content restrictions of the RoHS Directive.

Electrocube has not, and does not currently intentionally utilize any of the (10) RoHS restricted heavy metals, flame retardants or phthalates as discrete substances or compounds additive to our products during processing performed in product manufacture at Electrocube.

Electrocube has accomplished revised procurements and implemented use of Tin (Sn) only plating as our primary solderable finish for (round) termination lead-wires (utilized internally and externally), and for features / details of fabricated and purchased component parts as replacement for the tin/lead plating previously typical.

Electrocube has obtained revised lead-free soldering materials and equipment, and accomplished process revisions implementing the use of various lead-free solder alloys as replacements for the tin/lead alloys previously used.

Electrocube has evaluated our Standard Products (as defined) to be fully compliant with the content restrictions imposed by the RoHS Directive and associated Annex's.

Unless otherwise specified by Contract / Purchase Order; 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 10 Restricted Substances Listed by EU RoHS (2.0 Recast) Directive 2011/65/EU Annex II (in excess of the specified %W/W requirement) in processing, raw materials and components, utilized in the construction and manufacture of Electrocube Standard Products (as defined).

Electrocube "Standard Products" (as defined) supplied to our Distributors and OEM Customers as of date code 0540 (YYWW) and subsequent, shall be considered RoHS Compliant and Pb-Free, unless specifically acceptable and contracted otherwise. RoHS Compliant and Pb-Free product is specifically identified as such. The Electrocube part numbers for the RoHS Compliant and Pb-Free products are identical to that of the pre-existing non-compliant product configurations. Please refer to the COMPLIANCE IDENTIFICATION and PROCUREMENT CONSIDERATIONS sections.

Electrocube will continue to provide "Standard Products" in a fully "RoHS Compliant" condition as our standard configuration for the greatest percentage of this generalized product class. Having achieved a baseline of RoHS compliance, Electrocube continues to monitor and react to changing RoHS compliance requirements and the needs of industry, and we will continue to aggressively pursue material discovery, process / product development and procurement efforts as requirements change.

Exercise of RoHS Exemption(s) –

The RoHS Annex Exemptions / permitted uses and maximum content, potentially applicable to raw materials and components utilized by Electrocube, would be as follows: (Exemptions beyond those specifically noted have not been exercised by Electrocube in certification of product to be RoHS Compliant.

Exemption per EU RoHS Directive 2011/65/EU Annex III Point 6(a), for content of Lead (Pb) as an alloying element in steel containing up to 0.35% Pb by weight, and per Annex Point 6(c) as an alloying element in copper containing up to (4.00% or 40000 PPM) to necessarily enhance machining characteristics. These Exemptions may in some cases be exercised for specific styles of machined component parts, typically applicable to product utilizing hermetic glass-seal terminal features, such as hermetic Electrocube Capacitor Series and custom EMI Filter products. These products / series may in some cases be certified to be RoHS Compliant, but cannot be considered / certified to be Pb-Free.

Exemption per EU RoHS Directive 2011/65/EU Annex III Point 7(c)-I, for content of Lead (Pb) as an element in ceramic and glass elements of various electronics components (with no specific limitation). This Exemption may in some cases be exercised for specific styles of component parts, typically applicable to product utilizing hermetic glass-seal and ceramic terminal features, and discrete ceramic capacitor styles, such as hermetic Electrocube Capacitor Series and custom EMI Filter products. These product series may in some cases be certified to be RoHS Compliant, but cannot be considered / certified to be Pb-Free.

(No longer exercised)

Exemption per prior RoHS Directive 2002/95/EC, Commission Decision 2005/717/EC amending the RoHS Directive as Annex Point 9a, for content of specific PBDE flame retardant DecaBDE in-excess of the limitations imposed as a PBDE, *was exercised for the period from October 2005 to October 2006*, to consume existing inventory of specific insulating tape materials, as they were being replaced by procurement of alternative materials fully RoHS compliant without exercise of exemption 9a during this same period. This exemption was primarily applicable to a wide range of capacitor product series having tape-wrapped cases. The affected product series were certified to be RoHS Compliant with disclosure of the exercised exemption 9a. Electrocube does not currently purchase or use materials or components utilizing PBB, PBDE or DecaBDE as a flame retardant. *Product identified with date codes of 0640 and subsequent shall be considered to be RoHS compliant without use of the DecaBDE Exemption.* Axial and radial lead plastic-case style components do not utilize the subject tape material, and shall be considered compliant without use of the DecaBDE Exemption from date code 0540 onward. The DecaBDE Exemption (Annex Point 2 of EU Commission Decision 2005/717/EC / RoHS Directive Annex Point 9a) was annulled by Judgment of the Court of 1 April 2008, and expired as of 30 June 2008.

CONTINUING AREAS OF RoHS NON-COMPLIANCE –

Electrocube continues to supply RoHS Non-Compliant products to our Distributors and OEM customers for a limited number of inactive, less active or specialized catalog products, and custom product configurations, based upon:

- Unavailability of RoHS compliant materials and components.
- Economic considerations directing consumption of existing inventories of RoHS Non-Compliant materials and components.
- Practical engineering / design necessity directing continued use of RoHS Non-Compliant materials and components.
- Customer preference / requirements; which in some cases demand continuing availability of the “Non-Compliant – Lead Containing” variation of product for their critically qualified “locked-in” high reliability applications.
- Customer acceptance. Electrocube product which is RoHS Non-Compliant must be specifically contracted and acceptable as such.

The area of intentional RoHS Non-Compliance is Lead(Pb) content. Limited use and procurement of components and materials having restricted lead content continues, such as tin-lead plated finishes, tin-lead solder alloys, ceramic and glass insulating components, and precision machined steel, copper and brass components; typically supporting manufacture of custom products, but also affecting supply of a small percentage of less active / less standard catalog products. Acceptability of specific levels of Lead content are covered by RoHS Exemptions in the case of the noted ceramic, glass and machined components.

Specific Electrocube products may necessarily utilize various components and conductors having tin-lead plated finishes internal and external to product construction. Electrocube will continue to utilize various tin-lead solder alloys to make specific types of internal and external electrical connections, and to seal hermetic metal-cased products.

Electrocube continues to maintain inventory of tin-lead plated variations of termination lead wire (round & flat-ribbon) for use on specific products as directed / approved by those customers. Variable alloys of tin/lead plating may continue to apply to specific types of component parts utilized on specific products as directed / approved by those customers.

Flat-ribbon conductors, having tin-lead plated finish, may continue to be utilized in construction of a small percentage of specific standard product series, pending depletion of existing material inventories, and economic procurement of replacement conductor materials having tin (only) plated finish.

Tin-lead alloy winding foils may continue to be utilized in construction of a small percentage of specific standard product series, pending depletion of existing material inventories, and economic procurement of replacement tin (only) foil materials in construction of a limited number of specific capacitor series and values. As available and appropriate, the applicable capacitor series and values have been re-specified to utilize acceptable alternative tin (only) or aluminum (rather than tin-lead) winding foils.

As required by, or as acceptable to our customers, Electrocube will continue to support requirements for non-lead-free products (as historically provided, but otherwise RoHS compliant) as customer directed exceptional variations of Standard Products, and as fully Custom (build-to-specification) Products. Non-lead-free construction may be limited to the use of tin-lead solder for specific critical solder terminations and plated finishes, to the extent that materials and components remain available to support customer specifications. Please refer to COMPLIANCE IDENTIFICATION and PROCUREMENT CONSIDERATIONS sections.

“Custom Products” shall be broadly defined as: Electrocube (including Seacor and F-Dyne/Southern Electronics) products having specialized configuration, testing or qualification, designed and developed for specific customer application, manufactured and supplied per customer specifications, and typically carrying a unique part number.

In regard to custom products, it is Electrocube's intention to comply with the requirements of the RoHS Directive relative to content of restricted substances to the maximum extent possible, with exceptions taken for intentional lead content in the form of tin-lead plated finishes and tin-lead solder alloys, and to implement conversion to fully compliant lead-free configurations at customer request, and as otherwise acceptable.

Electrocube will not unilaterally revise custom products and implement the requirements of the RoHS Directive, without prior customer direction or approval, where doing so would violate prior customer agreements, or the requirements of prior product acceptance / qualification, particularly in regard to the lead-free requirements of the RoHS Directive, which are considered to have a potential product reliability impact.

Electrocube will perform appropriate testing as directed by our customer to sufficiently verify / confirm that the performance and reliability of any revised custom product configuration is equivalent to that of product previously / historically provided.

PRODUCT QUALIFICATION –

Electrocube has determined that the functional electrical performance and reliability characteristics of our Standard Products are not negatively affected by implementation of RoHS Compliant and Pb-Free product designs. Electrocube has accomplished appropriate testing to sufficiently verify / confirm that the performance and reliability of revised product configurations are equivalent to that of product previously / historically provided.

Pb-FREE TERMINATION FINISH CATEGORY –

Electrocube provides RoHS Compliant and Pb-Free active Standard Products having standard tin (Sn) plated lead wires. This "2nd Level Interconnect" Pb-Free Termination Finish is designated Category "e3" per IPC/JEDEC J-STD-609B April 2016.

PRODUCT COMPLIANCE IDENTIFICATION –

The catalog part numbers for Electrocube Standard Products have not been revised to reflect RoHS Compliant status, as those compliant designs are the new Standard Product. It is Electrocube's intention to supply Standard Product in a configuration that meets the significant environmental / content requirements of our customers on an ongoing basis, without the need for continuous part number change as content requirements may change.

RoHS Compliant and Non-Compliant products are specifically identified, and separately processed in controlled manufacturing, and are specifically identified and separately packaged and stored in controlled inventory. As RoHS Compliant procurement and processing has been phased-in, and as fully compliant production lots have been realized, Electrocube is able to specify the manufacturing date code, including and beyond which a specific product or product series may be certified to be RoHS Compliant and Pb-Free (lead-free).

Electrocube Standard Products are not directly marked to specifically reflect / confirm RoHS Compliant, and/or Pb-Free status. The lowest level of product packaging is marked with date code information, by which compliance status may be primarily determined. Date code information may or may not be directly marked on product, based upon the physical size and configuration of the product, available marking capability and cost.

The lowest level product packaging, as well as shipping documentation (shipper, invoice, C of C) additionally includes positive identification of product compliance status, by way of appropriate RoHS Compliant and Pb-Free symbology and text. Reference IPC/JEDEC J-STD-609B April 2016.

Electronics industry requirements for special classification, identification and packaging of products with regard for maximum safe processing temperature and duration, and moisture sensitivity, are specifically applicable to surface mounted components exposed to higher temperature oven-reflow soldering processes, and are not applicable to typical Electrocube Standard Products to be manually or machine (wave) solder terminated, or mechanically or crimp terminated.

PRODUCT MOISTURE SENSITIVITY CLASSIFICATION –

Electronics industry standards / requirements such as IPC/JEDEC J-STD-020 & J-STD-033, and EIA/JEDEC JEP113, for special classification, identification and packaging in regards to moisture sensitivity, are specifically applicable to surface mounted components exposed to higher temperature oven-reflow soldering processes, and not applicable to typical Electrocube Standard Products, to be manually or machine (wave-flow) solder terminated to circuit card assemblies, to be manually and mechanically installed and terminated, or to be manually solder or crimp terminated into wired assemblies.

SOLDER PROCESS TEMPERATURE – DURATION CAPABILITY –

Certification of compliance with RoHS content requirements does not imply certification that Electrocube product is compatible with Pb-Free (lead-free) machine (oven-reflow or wave-flow) soldering processes. Electrocube's products, in pre-existing lead-containing, and in current lead-free configurations might be considered to be temperature sensitive in machine or manual soldering processes based upon pre-existing limitations of basic plastic materials from which they are constructed, and not on the basis of a change to lead-free content. Electrocube products may be considered to be less compatible with the increased processing temperatures required by lead-free soldering processes.

In any manufacturing processes, temperature exposure shall not result in component body temperatures exceeding the limitations of the applicable dielectric materials (85 deg. C for polystyrene, 105 deg. C for polypropylene, and 125 deg. C for polyester, polycarbonate and polyphenylene sulfide). Transfer of higher temperatures directly into the product by way of component leads is also potentially damaging.

These products should be considered temperature sensitive based upon the variables of dielectric material, value, tolerance, physical size, package style, lead length, and specifics of preheat technology, and maximum exposure of temperature and duration. Acceptable soldering (and other) processes must favor the minimum effective exposure of temperature and duration or risk component damage.

In machine controlled (wave-flow) solder processing, the combination of top and bottom side preheating (and duration over solder) shall not result in component body temperatures exceeding the limitations of the applicable dielectric materials. Wave solder processing should be considered inapplicable for product utilizing polystyrene dielectric materials. The maximum peak (solder) temperature might be nominally characterized as 500 deg. F (260 deg. C) for 4 seconds. Excessive solder contact time can transfer excessive heat, damaging dielectric materials and internal electrical connections through the component lead wires.

Manual soldering processes should utilize temperature controlled soldering iron systems, having temperature of 600 to 700 deg. F (316 to 371 deg. C) and a heating duration of 2 to 5 seconds. Excessive soldering iron temperature and contact time can damage internal electrical connections. The potentially damaging effects of necessarily increased lead-free soldering temperatures and durations may be mitigated by use of optimized soldering tools and technique to complete solder terminations using the minimum effective temperature and duration.

Temperature and duration parameters for soldering processes should be considered not applicable to specific styles of Electrocube Standard Products, to be manually and mechanically installed and terminated, or to be manually solder or crimp terminated into wired assemblies.

Pb-FREE SOLDER PROCESS COMPATIBILITY –

In regard to elevated temperature capability and solderability, the pre-existing lead-containing and tin-lead plated, and current lead-free and tin plated configurations of the applicable Electrocube Standard Products should be considered backward COMPATIBLE with manual and machine (wave) soldering processes (controlled within the noted guidelines) utilizing conventional tin-lead solder alloys Sn63Pb37 or Sn60/Pb40.

In regard to elevated temperature capability, the pre-existing lead-containing and tin-lead plated, and current lead-free and tin plated configurations of the applicable Electrocube Standard Products should be considered NOT COMPATIBLE with Pb-Free machine (oven-reflow) solder profile per industry standard IPC/JEDEC J-STD-020, and NOT COMPATIBLE with a typical lead-free wave-flow solder process based upon temperature limitations of dielectric material. The necessarily increased temperatures and durations of all stages of the Pb-Free (lead-free) oven-reflow or wave-flow solder process will significantly exceed the temperature capability the plastic dielectric materials from which these products are constructed resulting in defective components.

In regard to elevated temperature capability and solderability, the pre-existing lead-containing and tin-lead plated, and current Pb-Free (lead-free) tin plated configurations of the applicable Electrocube Standard Products should be considered forward COMPATIBLE with Pb-Free (lead-free) manual soldering processes (controlled within the noted guidelines).

Forward and backward solder process compatibility, of the pre-existing lead-containing and tin-lead plated, and current Pb-Free (lead-free) tin plated configurations of Electrocube Standard Products, should be considered not applicable to specific styles of the listed Electrocube standard products, to be manually and mechanically installed and terminated, or to be manually solder or crimp terminated into wired assemblies.

PRODUCT PROCUREMENT CONSIDERATIONS -

Electrocube provides what we would broadly categorize as Standard Products (as defined) in a fully "RoHS Compliant" condition as our standard configuration for the greatest percentage of this generalized product class.

RoHS Compliant procurement and manufacturing processing is fully implemented. Inventories of basically compliant materials and components have been established. Electrocube does not anticipate that supply of RoHS Compliant product will result in an increase in typical lead-times. Provision of RoHS Non-Compliant product may increase lead-time on a case-by-case basis as these materials may become more exceptional.

Customers will need to be specific regarding requirement for RoHS Compliance or Non-Compliance at the time of order placement, as both product variations are available from inventory or manufacture. Residual inventories of RoHS Non-Compliant product may in some cases be available for immediate delivery where RoHS Compliance is not required.

Implementation of RoHS compliant procurements and manufacturing processing has not resulted in any directly associated price increase for RoHS Compliant product. Maintenance of capability to provide RoHS Non-Compliant product may increase costs and pricing on a case-by-case basis as these materials may become more exceptional. Electrocube anticipates the pricing of both RoHS Compliant and Non-Compliant products will continue to be reviewed based upon numbers of cost factors as ordered, and may require periodic adjustment based upon numerous cost factors.

IN CLOSING -

As our valued customer, Electrocube has appreciated your patience as we have implemented RoHS compliant (and lead-free) procurement, manufacturing and supply of Electrocube products, as we react to periodic RoHS Directive corrections, amendments and decisions, and to your requests for product specific certification.

Please do not hesitate to contact the Electrocube Sales / Customer Service Department by phone at 909-5958-4037, by FAX at 909-595-0186, or by e-mail at esales@electrocube.com, if you need any further assistance with regard to the RoHS status of Electrocube products relative to content of the restricted substances.

Yours sincerely,
Electrocube Incorporated



L. Clay Parrill – President