



**CURTIS**



**May 23, 2019**

To Our Valued Customers,

Curtis Instruments (Curtis) has partnered with Assent Compliance to both educate our supply chain and to ensure Curtis compliance documents have sufficient data quality. In addition to this education, Assent will be gathering SVHC disclosure and RoHS declarations of compliance from the Curtis supply chain to enable our downstream communication to our customers. Please coordinate with Assent for obtaining Curtis' RoHS and REACH declarations after this date through the email link: [curtisinstrumentsrequests@assentcompliance.com](mailto:curtisinstrumentsrequests@assentcompliance.com)

### Global RoHS

The Restriction of Hazardous Substances (RoHS) was originally a European Union (EU) Directive that applied to electronic equipment that was adopted in 2003. Since the adoption, RoHS Directives have been adopted around the world with variations to the scope and technical exemptions that are available.

To comply with RoHS, Curtis has reviewed the scope of the directive against the company's product lines. For products that are in scope of RoHS, Curtis has taken steps to ensure its products are RoHS compliant by ensuring they do not contain the following materials at a homogenous material level in concentrations greater than: lead (0.1%), mercury (0.1%), cadmium (0.01%), hexavalent chromium (0.1%), polybrominated biphenyls (PBB) (0.1%), polybrominated diphenyl ethers (PBDE) (0.1%), butyl benzyl phthalate (BBP) (0.1%), dibutyl phthalate (DBP) (0.1%), diisobutyl phthalate (DIBP) (0.1%), and Bis(2-ethylhexyl) phthalate (DEHP) (0.1%), in any homogeneous material contained in our in-scope products.

In some circumstances, Curtis produces in scope products that may contain a RoHS restricted substance. For example, Curtis motor speed controllers are used as components in equipment which is specifically designed and meant to be installed as part of another type of equipment that is excluded or does not fall within the scope of the RoHS Directive, which can fulfill its function only if it is part of that equipment, and which can be replaced only by the same specifically designed equipment.

In instances where Curtis claims additional available RoHS exemptions for its products, they will be listed by the Curtis Part Number on the RoHS Exemption List.

All other Curtis product lines conform to the RoHS Directive and are listed in the RoHS Compliant List.

### EU REACH

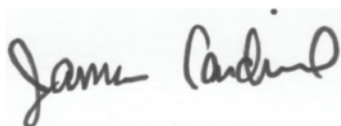
The European Union's REACH Regulation requires EU manufacturers and importers to determine if they must: (1) register certain substances with the European Chemicals Agency (ECHA), (2) notify ECHA if sufficient quantities of restricted substances are present, or (3) communicate to

customers that certain substances are present in the materials (“articles” and “preparations”) they manufacturer’s or import into the EU. Curtis’ compliance efforts include monitoring REACH regulatory developments and conducting an evaluation process for our products for the presence of any declarable substances.

Our product evaluation focuses on supply chain inquiries submitted to the manufacturer or distributor of raw materials or by subcontract assemblers of Curtis products. Because our evaluation is reliant on third party information, we cannot verify to a certainty the accuracy of such third party information. With that limitation in mind, we can provide the following information to our customers:

1. Registration with ECHA: When assessing REACH requirements for registration, EU manufacturers and EU importers are required to evaluate their articles to determine whether a prescribed exposure to chemicals exists. Registration of substances in articles is required where: (a) substances are intended to be released from the produced or imported articles during normal and reasonably foreseeable conditions of use; and (b) the total amount of substances present in the articles with intended releases produced and/or imported by that actor exceeds one (1) metric ton or more per year per producer or importer. As of the date of this correspondence, there are no known or intended releases of a chemical substance under normal or reasonably foreseeable conditions from the use of Curtis products. Therefore, Curtis Instruments is not subject to registration requirements under Article 7(1) and 7(5) of REACH for its products produced in and/or imported into the EU.
2. Notification to ECHA: Separate from the registration requirement above, the REACH Directive requires EU manufacturers and importers of certain substances to notify ECHA regarding each substance that is: (a) a Substance of Very High Concern (SVHC), present above a concentration threshold of 0.1% of the weight of the importer article(s); and (b) imported in quantities of one (1) metric ton or more per year. Exemptions and other conditions can play into Curtis’ analysis. As of the date of this correspondence, Curtis has concluded that the organization does not import more than one (1) metric ton of any of the current SVHCs during the current calendar year. Therefore, the notification requirement under Article 7(2) of REACH is not applicable.
3. Communication to Customers: REACH also imposes communication requirements on EU manufacturers and importers to their customers regarding the existence of SVHC, if present above a concentration threshold of 0.1% of the weight of the preparation or article. Based upon the supplier responses to Curtis inquiries, Curtis has not identified SVHCs in any of the articles Curtis sells to the EU above a concentration of 0.1% w/w of any of the SVHC that appeared on the Candidate list as of the date of this correspondence. Accordingly, Curtis does not have sufficient data to warrant a customer declaration.

Curtis commits to compliance with REACH and communicates compliance to our customers as the scope and breadth of REACH evolves. This statement is not intended to replace or create any warranty. For information regarding the exclusive limited warranties applicable to Curtis’ products themselves please see the Curtis terms and conditions of sale.



Signed \_\_\_\_\_

James Cardinal

*Corporate Compliance Manager*