



## REACH Compliance Declaration

Dear Customer:

After careful evaluation of the European Union Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Zircon Corporation, hereby certifies that the products: assembled by Zircon Corporation, with the best of our knowledge are fully compliant with the related requirements of REACH:

1. **Registration with ECHA.** Under the structure of the REACH regulation, Zircon Corporation is a manufacturer of “articles” to our EU customers (according to ECHA's guidance for articles, all our products shall be considered as articles.) We do not manufacture “Substances” or “Preparations” and our articles do not involve the intentional release of substances during normal and foreseeable conditions of use. Accordingly, we foresee no registration or preregistration requirements for the products we supply to you.
2. **Notification with ECHA.** With regards to the requirements of Article 33 of REACH: Duty to communicate information on substances in articles. We declare that none of the SVHCs (the Candidate List of Substances of Very High Concern for authorization currently released by ECHA till date of Jan/19/2021, 211 SVHC found in this link <http://echa.europa.eu/candidate-list-table> .) is present in Zircon's products (and packaging) in quantities totaling in a concentration equal or above 0.1% w/w, therefore the notification requirements under Article (7) are not applicable to Zircon's products.
3. **Restrictions on the Manufacturing.** With regards to the requirement of Article 67 of REACH: A substance of its own, in a preparation or in an article, for which Annex XVII contains a restriction shall not be manufactured, placed on the market or used unless it complies with the conditions of that restriction. We declare that to the best of our knowledge none of the restricted substances is present in Zircon's products (or packaging) in quantities totaling in a concentration equal or above 0.1% w/w.
4. **Communication to Customers.** REACH also imposes communications requirements on EU manufacturers and EU 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. As the date below, none of Zircon's products have equal to or greater than 0.1% weight over weight of any of the 151 substances. Therefore, Zircon has no statutory communications requirements to its customers under article 33 of REACH for its products.

As REACH regulation is updated frequently, for the major changes afterward, such as the addition of SVHC into Annex XIV, the addition of restricted substances in Annex XVII, Zircon will evaluate and further revise in time and update this declaration to reflect these changes.

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Corporate Quality and Environmental Compliance Director  
Zircon Corporation  
Rev D, Mar/18/2021