

Date: March 25<sup>th</sup>, 2024

**Subject: EG No. 1907/2006 Registration, Evaluation and Authorization of Chemicals (REACH)**

The EG No. 1907/2006 for Registration, Evaluation and Authorization of Chemicals is a regulation enacted by the European Chemicals Agency (ECHA) in 2007 which regulates the use of certain chemical substances in all parts and products manufactured, sold and imported within the EU. This is updated at regular intervals, most recently on June 17, 2023. This letter still refers to the status of the last update of January 23, 2024. A review of the newly included substances is currently being carried out.

Our products and materials are not subject to registration as articles within the terms of REACH.

We as a company are aware of our responsibility and fulfill our disclosure duty. The relevance of this matter has also been communicated with our suppliers and pointed out their obligation to provide information.

The Candidate List according to Article 59 includes substances of very high concern (SVHC) which are subject to be declare according to Article 33 of the REACH Regulation, as soon as their share in the product exceeds 0.1 mass percent.

According to our current data, all our products meet the above criteria.

Silicone (VMQ) has the following special characteristic: in the raw compound, silicone often contains the SVHC-listed substances octamethylcyclotetrasiloxane (D4, CAS-No. 556-67-2), octamethylcyclopentasiloxane (D5, CAS-No. 541-02-6) and octamethylcyclohexasiloxane (D6, CAS-No. 540-97-6) in a proportion exceeding 0.1 mass percent. After manufacturing process is likely that the permitted amount of 0.1 mass percent will be undercut. We have determined this on a random basis in raw compounds using a migration test.

Regarding the listed substances in the SVHC list, following compounds exceed the limit of 0.1 mass percent.

Material	Compound	CAS-No.	Specification
CR	CR5004	96-45-7	2-Imidazolidinethione
CR	CR7001	96-45-7	2-Imidazolidinethione
NBR	NB5007	119-47-11	6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol
NBR	NB7005	119-47-11	6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol
NBR	NB7011	119-47-11	6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol

The mentioned NBR materials are colored compounds (except black). For manufacturing reasons, the substances listed here do not disappear below the limit of 0.1 mass percent.

Herewith we have fulfilled our duty to inform according to article 33. If you have any further questions regarding the REACH regulation, please do not hesitate to contact our sales department.