



Date: 20, January 2020

To: Whom it may concern

From: Jay S. Tourigny
Senior Vice President

Ref: MicroCare compliance with REACH Regulation (EC) No 1907/2006 of the European Parliament

The EU REACH Regulation (Registration, Evaluation and Authorization of Chemicals) was adopted in December 2006, and entered into force on 01 June, 2007. MicroCare Corporation and its affiliates support the overall REACH objectives with an unwavering commitment to safety for our employees, our customers, and all who handle our products regardless of their location.

As a United States based company with EU manufacturing operations that may import substances that may be covered under REACH⁽¹⁾, MicroCare has taken an active role in addressing all of the requirements as they apply to our products sold, and our customers in the EU/EAA. Please be aware the following:

- MicroCare intends that at the time of sale, all products sold to EU/EEA customers by MicroCare BVBA⁽²⁾, a legal entity in Europe, are in compliance with applicable REACH regulatory requirements, including Notification⁽³⁾.
- REACH requires registration for individual substances (on their own or in preparations) greater than 1 metric ton per year produced or imported⁽⁴⁾. However, each importer is responsible for its own compliance with REACH. MicroCare products brought into the EU by a third-party supplier/distributor located outside of the EU/EEA may not necessarily be compliant with REACH requirements.
- As of the date of this memo, none of the products sold by MicroCare BVBA in the EU, to our current knowledge, contain substances at concentrations above the legal threshold⁽⁵⁾ that are included on the *Candidate List of Substances of Very High Concern for Authorisation* (SVHC substances); as published on the ECHA website as of 16 January, 2020⁽⁶⁾.

To understand fully the obligations that you as our customer will have under REACH, we recommend that you consult the REACH web site at <http://echa.europa.eu>.

Please feel free to contact your MicroCare representative if you have additional questions related to your specific circumstances.

NOTES:

1) Substance: a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition (REACH, Art. 3.1).

2) MicroCare BVBA is a legal entity in the EU/EEA, with offices and stocking warehouse located in Belgium.

3) Products and Preparations sold by MicroCare in the EU consist of substances either formulated or packaged in the EU by MicroCare as a downstream user; or by using substances imported into the EU under the written authorization of an Only Representative; or by importing small quantities and submitting appropriate notifications per EC1272/2008, Articles 39-42. Receipt of necessary files and notifications have been acknowledged by ECHA.

4) Preparation: means a mixture or solution composed of two or more substances (REACH, Art. 3.2).

5) Inclusion of a substance on the Candidate List may impose immediate legal obligations upon companies with chemical products or articles that contain more than 0.1wt% of the substances. You can find more information about these obligations on the ECHA website: <http://echa.europa.eu/web/guest/candidate-list-obligations>.

6) <http://echa.europa.eu/candidate-list-table>