

REACH (EC/1907/2006)

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The REACH means **R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemicals.

The basis for the law REACH is the EC ordinance 1907/2006. The REACH ordinance, which came into power on 1. June 2007, was published in the official EC gazette on 18. December 2006. Since then, the REACH ordinance is immediately and equally binding in all EC member states and this without the necessity of a national implementation.

The aim of the REACH ordinance is to guarantee a high level of protection for human health and for the environment as well as the free circulation of substances, in preparations or articles. INGUN Prüfmittelbau GmbH regards this general social aim as being both very worthwhile and indispensable. For this reason, all business decisions and actions of INGUN Prüfmittelbau GmbH are always reviewed in this regard.

In our own interest, and to ensure a high level of product safety, we observe the conversion and implementation of REACH and the resulting demands intensively.

In terms of the EC ordinance 1907/2006 INGUN Prüfmittelbau GmbH is a **downstream user**; a natural person or legal entity established within in the European Community, who uses a substance, either on its own or in a preparation, in the course of his industrial or professional activities.

The products placed on the market by INGUN Prüfmittelbau GmbH are **articles**. They do not contain any substances which are intentionally released under normal and reasonably foreseeable conditions of use.

All preparations used by INGUN Prüfmittelbau GmbH were reviewed in regard to their usage by means of the enhanced safety data sheets from our suppliers. Subsequently, applicable processes at INGUN Prüfmittelbau GmbH are installed, which ensure that only the usages allowed by the manufacturer are abided by.

Because INGUN Prüfmittelbau GmbH does not manufacture any substances or import any substances from outside the European economic area, then no necessity exists, that demands that INGUN Prüfmittelbau GmbH should carry out preregistration or registration itself. Any demanded preregistration or registration is carried out by our sub-suppliers during the supply chain.

According to article 33 "Obligation to circulate information about substances and products", we are in contact with our sub-suppliers to clarify whether the products which are supplied to us contain any dangerous substances (SVHC = substances of **very high concern**) that have more than 0.1% weight by weight (w/w).

SVHC are substances which are listed in the so-called "candidates list". The current, legally binding list can be found here: <https://echa.europa.eu/candidate-list-table>.

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We do not perform routine tests to test for the presence of SVHC, and analytical monitoring of potential contaminations is not part of incoming or outgoing goods inspection. Many substances are ubiquitous and can therefore possibly be detected as contamination in the article.

To the best of our knowledge and considering our suppliers' information, we can confirm that since lead has been listed as a SVHC (CAS number 7439-92-1), some articles placed on the market by INGUN Prüfmittelbau GmbH contain substances of very high concern listed in the latest REACH candidate list (version: 16. July 2019) containing more than 0.1% weight by weight (w/w).

When used as intended, articles placed on the market by INGUN Prüfmittelbau GmbH no substances are intentionally released, nor do the substances contained themselves pose any threat.

We would like to point out that the listing of lead as a SVHC is not a ban of lead, but rather an obligation for communication along the supply chain. Currently lead is an important alloying constituent for aluminium, steel, and copper materials. Materials containing lead have long been widely used and offer a variety of technological advantages, in particular increased corrosion resistance, improved malleability in hot and cold conditions, improved machinability, as well as improved slide/friction characteristics and high density.

An overview of the products containing substances of very high concern with more than 0.1% weight by weight (w/w) can be found on page 3.

This statement was generated electronically and is valid without a signature.

INGUN Prüfmittelbau GmbH

The Management

Constance, July 2019

| Designation | SVHC | Date of inclusion | Annex XVII |
|---------------------------|-----------------------------|-------------------|---|
| | | | Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles |
| Spring-loaded test probes | Lead (CAS number 7439-92-1) | 27. June 2018 | No restrictions in the use as test equipment |
| Receptacles | Lead (CAS number 7439-92-1) | 27. June 2018 | |
| Test fixtures | Lead (CAS number 7439-92-1) | 27. June 2018 | |
| Test fixture accessories | Lead (CAS number 7439-92-1) | 27. June 2018 | |