

January 23 2018

E.U. REACH-191 statement

This statement concerns European Union regulation 1907/2006 of 18 December 2006 -- Registration, Evaluation, Authorisation and Restriction of Chemicals, also known as REACH, and applies to all BI Technologies Corporation products.

Under REACH regulations we are considered a provider of "articles." All of our products are assemblies, not raw materials. None of our products intentionally release substances to the environment. Many of our products contain diboron trioxide and lead monoxide in the cermet conductors and resistors, now listed as Substances of Very High Concern (SVHC). See individual product material disclosures for details of content. However, we claim no exposure of this material to humans or the environment during normal or reasonably foreseeable conditions of use including disposal. The sum of each unique construction material in our articles imported into the E.U. is also less than one tonne per year.

Given those conditions, our products are exempt from REACH pre-registration and later registration activities. We provide separate E.U. Reduction of Hazardous Substances documentation.

Our exempt status is based on our understanding of REACH as given in guidance document "Guidance in a Nutshell on requirements for substances in articles" found at <https://echa.europa.eu/support/guidance-on-reach-and-clp-implementation/guidance-in-a-nutshell> (dated December 2017), all SVHC lists published prior to January 23, 2018 (currently 181 items), and our knowledge of materials used to manufacture our products.

Signature: 

Date: 1/23/2018

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