



January 1, 2018

To Our Valued Customers,

This year, Curtis has partnered with Assent Compliance in order to inform our supply chain and to ensure Curtis compliance data quality. In addition, Assent will be gathering Substance of Very High Concern (SVHC) and Restriction of Hazardous Substances (RoHS) data from Curtis' supply chain to enable Curtis to inform and respond to SVHC/RoHS requests from its customers and provide an update by December 1, 2017. SVHC data will provide input for the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)

Please coordinate with Assent for obtaining Curtis' RoHS and REACH declarations after Dec. 1 through the email link:

curtisinstrumentsrequests@assentcompliance.com

Global RoHS

RoHS was originally a European Union (EU) Directive that applied to electronic equipment that was adopted in 2003. Since the adoption, RoHS Directives have been adopted around the world with variations to the scope and technical exemptions that are available.

To comply with RoHS, Curtis has taken steps to ensure its products are RoHS compliant by ensuring its products do not contain the following materials at a homogenous material level in concentrations greater than: lead (0.1%), mercury (0.1%), cadmium (0.01%), hexavalent chromium (0.1%), polybrominated biphenyls (PBB) (0.1%), polybrominated diphenyl ethers (PBDE) (0.1%), butyl benzyl phthalate (BBP) (0.1%), dibutyl phthalate (DBP) (0.1%), diisobutyl phthalate (DIBP) (0.1%), and hexabromocyclododecane (HBCDD) (0.1%), in any homogeneous material contained in our products.

In some circumstances Curtis produces products that may contain a non-compliant RoHS restricted substance, either because it may not be technically feasible to be compliant or it has been defined by customer requirements. Curtis claims available RoHS exemptions for these products, which are listed in the Curtis Product List along with their exemption status.

EU REACH

The European Union's REACH Regulation requires EU manufacturers and importers to determine if they must: (1) register certain substances with the European Chemicals Agency (ECHA), (2) notify ECHA if sufficient quantities of restricted substances are present, or (3) communicate to customers that certain substances are present in the materials ("articles" and "preparations") they manufacturer or import into the EU.

Curtis' compliance efforts include monitoring REACH regulatory developments and conducting an evaluation process for our products for the presence of any declarable substances.

Our product evaluation focuses on supply chain inquiries submitted to the manufacturer or distributor of raw materials or by subcontract assemblers of Curtis products. Because our evaluation is reliant on third party



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information, Curtis cannot verify to a certainty the accuracy of such third party information. With that limitation, we can provide the following information to our customers:

- 1. Registration with ECHA:** When assessing REACH requirements for registration, EU manufacturers and EU importers are required to evaluate their articles to determine whether a prescribed exposure to chemicals exists. Registration of substances in articles is required where: (a) substances are intended to be released from the produced or imported articles during normal and reasonably foreseeable conditions of use; and (b) the total amount of substances present in the articles with intended releases produced and/or imported by that actor exceeds one (1) metric ton or more per year per producer or importer. As of the date of this correspondence, there are no known or intended releases of a chemical substance under normal or reasonably foreseeable conditions from the use of Curtis products. Therefore, Curtis has determined that it is not subject to the registration requirements under Article 7(1) and 7(5) of REACH for its products produced in and/or imported into the EU.
- 2. Notification to ECHA:** Separate from the registration requirement above, the REACH Directive requires EU manufacturers and importers of certain substances to notify ECHA regarding each substance that is: (a) a Substance of Very High Concern (SVHC), present above a concentration threshold of 0.1% of the weight of the imported article(s); and (b) imported in quantities of one (1) metric ton or more per year. Exemptions and other conditions can factor into Curtis' analysis. As of the date of this correspondence, Curtis has concluded that the organization does not import more than one (1) metric ton of any of the current SVHCs during the current calendar year. Therefore, Curtis has determined that the notification requirement under Article 7(2) of REACH is not applicable.
- 3. Communication to Customers:** REACH also imposes communication requirements on EU manufacturers and 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. Based upon supplier responses to Curtis inquiries, Curtis has not identified SVHCs in any of the articles Curtis sells into the EU above a concentration of 0.1% w/w of any of the SVHC that appear on the Candidate list as of the date of this correspondence. Accordingly, Curtis has determined that it does not have sufficient data to warrant a customer declaration.
- 4.** Curtis commits to be compliant with REACH and to communicate its compliance to its customers as the scope and breadth of REACH evolves. This statement is not intended to replace or create any warranty. For information regarding the exclusive limited warranties applicable to Curtis products please refer to Curtis's terms and conditions of sale.

Signed _____

James Cardinal
Corporate Compliance Manager