

Dear Ladies and Gentlemen,

December 2013

The purpose of this letter is to inform you of the status of our products with respect to Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), 2002/95/EEG respectively 2011/65/EU (RoHS) - Restriction of Hazardous Substances Directive or RoHS as well as the 2000/53/EC - Directive End of Life Vehicles "ELV".

ODW-ELEKTRIK manufactures, imports and supplies products which qualify as "articles", as defined in the REACH regulations, and which therefore do not require registration with the European Chemicals Agency (ECHA) in Helsinki.

In addition, ODW-ELEKTRIK will not be required to submit a registration for the chemical substances contained in the "articles" as no substances are intended to be released under normal or reasonably foreseeable conditions of use.

In order to meet our obligations under Article 33 of the Regulations, we will advise of any products which contain substances subsequently included on published candidate lists. In addition we will provide all required information.

In recognition of our duties within the supply chain, and to ensure full compliance with this legislation, all ODW-ELEKTRIK facilities are working with their suppliers to ensure the proper pre-registration and registration of all base chemical substances, as appropriate.

We will continue our efforts in this area to ensure that there is no disruption within the supply chain and that all products manufactured and supplied by ODW-ELEKTRIK will be fully compliant with the regulations.

Furthermore, to inform our customers of the automotive industry, we publish material data sheets at International Material Data System (IMDS) to ensure, that the forbidden substances registered in the Global Automotive Declarable Substance List (GADSL) are not contained in our products.

Based on our current state of knowledge, following products / product groups are not contained in our cables and wires or are below the required values.

In general:

- a. Substances meeting the criteria for classification as carcinogenic category 1 or 2 in accordance with Directive 67/548/EEC,
- b. Substances meeting the criteria for classification as mutagenic category 1 or 2 in accordance with Directive 67/548/EEC,
- c. Substances meeting the criteria for classification as toxic for reproduction category 1 or 2 in accordance with Directive 67/548/EEC,
- d. Substances which are persistent, bioaccumulative and toxic in accordance with the criteria set out in Annex XIII of the EC Regulation No 1907/2006 (REACH),
- e. Substances which are very persistent, very bioaccumulative and very toxic in accordance with the criteria set out in Annex XIII of the EC Regulation No 1907/2006 (REACH),

- f. Substances – such as those having endocrine disrupting properties or those having persistent, bioaccumulative and toxic properties or very persistent, very bioaccumulative and very toxic properties, which do not fulfill the criteria of points a) till e) – for which there is a scientific evidence of probable serious effects to human health or the environment which give rise to an equivalent level of concern to those of other substances listed above and which are identified on a case-by-case basis in accordance with the procedure set out in Article 59 of the EC Regulation 1907/2006 (REACH).
- g. Substances which are listed in the Candidate List of Substances of Very High Concern for authorisation (SVHC). You will find the complete Candidate List of ECHA at <http://echa.europa.eu/de/candidate-list-table>.
- h. The Restriction of Hazardous Substances Directive or "RoHS" restricts the use of the following substances: Lead (Pb), Mercury (Hg), Cadmium (Cd), Hexavalent chromium (Cr₆₊), Polybrominated biphenyls (PBB), Polybrominated diphenyl ether (PBDE) and Decabromdiphenylether (DecaBDE).

In this context we refer to the complete Candidate List of ECHA at <http://echa.europa.eu/de/candidate-list-table>.

Should you have any questions or remarks, please do not hesitate to contact us,.

Kind regards

Christian Weiss
Managing Partner
Management