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Subject: REACH Compliance

Dated: 1 January 2019

Summitech LLC is committed to compliance with all known US laws and International treaties on the use and/or prohibition of dangerous substances.

Regulation (EC) No 1907/2006 of the European Parliament on the Registration, Evaluation, and Authorization of Chemicals, known as REACH, came into force 1 June 2007. This regulation advances the premise that industry should manufacture, market, import, or use substances such that, under reasonably foreseeable conditions, human health and the environment are not adversely affected. REACH registration provisions require manufacturers and importers to register and generate data to assess the risks related to those substances, and to develop and recommend appropriate risk management measures.

Summitech LLC intends to comply with REACH regulations as published and amended.

Article 7 requires registration of substances in articles given the following conditions: (a) the substances are intended to be released from the article(s) during normal and reasonably foreseeable conditions of use, and (b) the total amount of the substance present in the articles with intended releases produced and/or imported exceeds 1 metric ton per year per producer or importer.

- Summitech requires that suppliers identify each and every substance that is intended for release during the normal operation of articles procured by or on behalf of Summitech LLC.

Article 33 requires producers/suppliers of articles containing substances of very high concern in a concentration above 0.1% by weight to provide the recipients of the articles with the name of the substance and other information available to them to allow safe use of the article. Such information must also be provided to consumers upon request, within 45 days of the request, free of charge.

- Summitech requires that suppliers identify SVHC's present in articles procured by or on behalf of Summitech LLC. Summitech requires notification of each and every SVHC by name plus delivery of information for the safe handling of each and every SVHC that is present in such articles.

This statement declares that products provided for sale by Summitech LLC, to the best of our knowledge, are in conformance with the most current requirements of REACH. Summitech audits all production facilities and requires suppliers and sub-suppliers to provide certificates of compliance.