



**CURTIS**

A **KOHLER** COMPANY

April 2024

To Our Valued Customers,

In alignment with the guidelines in international industry standard IEC 63000:2018 (Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances), Curtis Instruments (Curtis) undertakes supply chain engagement to obtain the appropriate information to declare full compliance with the obligations of the RoHS Directive and the REACH Regulation.

Curtis has collaborated with Assent Compliance to gather REACH/SVHC disclosures and RoHS declarations of compliance from the Curtis supply chain in order to enable downstream compliance communications by our Customers.

Please coordinate with Assent for obtaining Curtis' REACH and RoHS declarations through the email link: [curtisinstrumentsrequests@assentcompliance.com](mailto:curtisinstrumentsrequests@assentcompliance.com)

### Global RoHS

To comply with RoHS, Curtis has reviewed the scope of the directive against the company's product lines. For products that are in scope of RoHS, Curtis has taken steps to ensure its products are RoHS compliant by ensuring they 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 Bis(2-ethylhexyl) phthalate (DEHP) (0.1%), in any homogeneous material contained in our in-scope products.

In some circumstances, Curtis produces in scope products that may contain a RoHS restricted substance. For example, Curtis motor speed controllers are used as components in equipment which is specifically designed and meant to be installed as part of another type of equipment that is excluded or does not fall within the scope of the RoHS Directive, which can fulfill its function only if it is part of that equipment, and which can be replaced only by the same specifically designed equipment.

The ten substances listed above and in Annex II of the RoHS Directive are restricted to a maximum concentration value (MCV) by weight in homogeneous materials, but technical exemptions granted by the European Commission enable those MCVs to be exceeded where substitution is not currently possible. Reference to the use of any of the approved exemptions shall be made as part of any Declaration of Conformity. All other Curtis product lines conform to the RoHS Directive.

## EU REACH

To support requests from customers related to the EU's Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation (Regulation (EC) No 1907/2006), Curtis is committed to demonstrating the fulfillment of due diligence for communicating downstream Substances of Very High Concern (SVHC), and Curtis will provide a Declaration of Conformity in accordance with Article


33 of the Regulation through our regular supplier engagement. Under REACH Article 33(1), companies placing product on the market in the EEA are required to communicate SVHCs contained in articles over 0.1% w/w from the European Chemicals Agency (ECHA) Candidate list of Substances of Very High Concern for Authorisation (Candidate SVHC) list and necessary safe use information.

Curtis' compliance efforts include monitoring REACH regulatory developments and conducting a BOM evaluation process, focusing on supply chain inquiries submitted to the component or sub-assembly manufacturers of Curtis products. Because our evaluation is reliant on third party information, Curtis cannot verify to a certainty the accuracy of such information. With that limitation in mind, 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 Instruments is not subject to 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 importer article(s); and (b) imported in quantities of one (1) metric ton or more per year. Exemptions and other conditions can play 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, 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 the supplier responses to Curtis inquiries Curtis may identify SVHCs appearing on the Candidate list as of the date of this correspondence in its articles. Curtis provides this information to its customers as necessary and required.

These statements are not intended to replace or create any warranty. For information regarding the exclusive limited warranties applicable to Curtis' products themselves, please see the Curtis terms and conditions of sale.

Signed \_\_\_\_\_



James Cardinal  
Corporate Compliance Manager