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Subject: Vectron's Compliance with EU REACH Regulations 1907/2006
From: Ram J. Arvikar
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To: Vectron's customers or To Whom it May Concern

Vectron has reviewed the requirements of the new EU REACH (Registration, Evaluation, Authorisation and Restriction of Chemical) Regulations released on June 1, 2007 which applies to chemicals manufactured in EU or being imported into EU. REACH requires pre-registration of chemicals during June 1, 2008 and Dec.1, 2008.

In consultation with its sister companies legally incorporated in Europe and external consultants knowledgeable about the REACH regulations, Vectron has determined that Vectron's products (Articles) are compliant to the regulations and will not require to be registered. Specifically:

- Vectron does not directly export chemicals (either substances or preparations of substances) to the EU but articles which are electronic components (frequency control products).
- Vectron is a downstream users of certain substances (e.g. polymer or polyimide adhesives, solder alloys some of which may contain Pb but are exempt under EU RoHS exemption) used in its products which are then marketed to EU customers directly or to customers who expect to export the Vectron product integrated in their assemblies to the EU.
- There is no intended release of substance or preparations from the Vectron products under normal and foreseeable conditions of use, and the quantities contained are well under the REACH usage and reporting threshold of 1000 tonnes per year per manufacturer or importer. Vectron estimates that based on the shipments to EU, the total quantity of substances in exported products are <1 tonne per year.
- To the best of our knowledge, based on a review of the supplier-provided data for materials incorporated in Vectron products, no Substances of Very high Concern (SVC) are contained in Vectron products as listed below (List as of Dec. 2010). Vectron has conveyed the REACH requirements to suppliers of substances and/or preparations used in Vectron products so that Vectron can accurately report information regarding the Vectron products when required by the EU regulations and be compliant to REACH regulations.

Candidate List of 73 SVHC's Under EU REACH Regulation (as of December 2011)

CAS No.	EC Number	Chemical Name
101-77-9	202-974-4	4,4'- Diaminodiphenylmethane
117-81-7	204-211-0	Bis (2-ethyl(hexyl)phthalate) (DEHP)
120-12-7	204-371-1	Anthracene
1303-28-2	215-116-9	Diarsenic pentaoxide
1327-53-3	215-481-4	Diarsenic trioxide
15606-95-8	427-700-2	Triethyl arsenate
25637-99-4 and 3194-55-6 (134237-51-7, 134237-50-6, 134237-52-8)	247-148-4 and 221-695-9	Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified (α - HBCDD, β -HBCDD, γ -HBCDD)
56-35-9	200-268-0	Bis(tributyltin)oxide; Tributyltin oxide

7646-79-9	231-589-4	Cobalt dichloride
7784-40-9	232-064-2	Lead hydrogen arsenate
7789-12-0		
10588-01-9	234-190-3	Sodium dichromate
81-15-2	201-329-4	5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)
84-74-2	201-557-4	Dibutyl phthalate
85535-84-8	287-476-5	Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)
85-68-7	201-622-7	Benzyl butyl phthalate
90640-80-5	292-602-7	Anthracene oil
91995-17-4	295-278-5	Anthracene oil, anthracene paste, distn. Lights
91995-15-2	295-275-9	Anthracene oil, anthracene paste, anthracene fraction
90640-82-7	292-604-8	Anthracene oil, anthracene-low
90640-81-6	292-603-2	Anthracene oil, anthracene paste
65996-93-2	266-028-2	Coal tar pitch, high temperature
	650-017-00-8	Aluminosilicate, Refractory Ceramic Fibres
	650-017-00-8	Zirconia Aluminosilicate, Refractory Ceramic Fibres
121-14-2	204-450-0	2,4-Dinitrotoluene
84-69-5	201-553-2	Diisobutyl phthalate
7758-97-6	231-846-0	Lead chromate
12656-85-8	235-759-9	Lead chromate molybdate sulphate red (C.I. Pigment Red 104)***
1344-37-2	215-693-7	Lead sulfochromate yellow (C.I. Pigment Yellow 34)***
115-96-8	204-118-5	Tris(2-chloroethyl)phosphate
79-06-1	201-173-7	Acrylamide
79-01-6	201-167-4	Trichloroethylene
10043-35-3 and 11113-50-1	233-139-2 and 234-343-4	Boric acid
1303-96-4,1330-43-4,12179-04-3	215-540-4	Disodium tetraborate, anhydrous
12267-73-1	235-541-3	Tetraboron disodium heptaoxide, hydrate
7789-00-6	232-140-5	Potassium chromate
7789-09-5	232-143-1	Ammonium dichromate
7778-50-9	231-906-6	Potassium dichromate
7775-11-3	231-889-5	sodium chromate
10124-43-3	233-334-2	Cobalt(II) sulphate
10141-05-6	233-402-1	Cobalt(II) dinitrate
513-79-1	208-169-4	Cobalt (II) carbonate
71-48-7	200-755-8	Cobalt(II) diacetate
109-86-4	203-713-7	2-Methoxyethanol
110-80-5	203-804-1	2-Ethoxyethanol
1333-82-0	215-607-8	Chromium trioxide
7738-94-5 13530-68-2 not yet assigned	231-801-5 236-881-5 not yet assigned	Acids generated from chromium trioxide and their oligomers Group containing: Chromic acid Dichromic acid Oligomers of chromic acid and dichromic acid
111-15-9	203-839-2	2-ethoxyethyl acetate
7789-06-2	232-142-6	strontium chromate
68515-42-4	271-084-6	1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters
302-01-2 and 7803-57-8	206-114-9	Hydrazine
872-50-4	212-828-1	1-methyl-2-pyrrolidone
96-18-4	202-486-1	1,2,3-trichloropropane
71888-89-6	276-158-1	1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich

7778-44-1	231-904-5	Calcium arsenate
111-96-6	203-924-4	Bis(2-methoxyethyl) ether
11103-86-9	234-329-8	Potassium hydroxyoctaoxidizincatedichromate
		Zirconia Aluminosilicate Refractory Ceramic Fibres are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.1 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfil the three following conditions: a) oxides of aluminium, silicon and zirconium are the main components present (in the fibres) within variable concentration ranges b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (μm). c) alkaline oxide and alkali earth oxide ($\text{Na}_2\text{O}+\text{K}_2\text{O}+\text{CaO}+\text{MgO}+\text{BaO}$) content less or equal to 18% by weight
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127-19-5	204-826-4	N,N-dimethylacetamide
7778-39-4	231-901-9	Arsenic acid
6477-64-1	229-335-2	Lead dipicrate
107-06-2	203-458-1	1,2-dichloroethane
90-04-0	201-963-1	2-Methoxyaniline; o-Anisidine
3687-31-8	222-979-5	Trilead diarsenate
49663-84-5	256-418-0	Pentazinc chromate octahydroxide
140-66-9	205-426-2	4-(1,1,3,3-tetramethylbutyl)phenol
25214-70-4	500-036-1	Formaldehyde, oligomeric reaction products with aniline
117-82-8	204-212-6	Bis(2-methoxyethyl) phthalate
13424-46-9	236-542-1	Lead diazide, Lead azide
15245-44-0	239-290-0	Lead styphnate
101-14-4	202-918-9	2,2'-dichloro-4,4'-methylenedianiline
77-09-8	201-004-7	Phenolphthalein
24613-89-6	246-356-2	Dichromium tris(chromate)



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