

REACH Statement

Dear Madam, dear Sir,

Thank you for your inquiry related to the REACH regulation.

RENATA SA has implemented this regulation right from its incoming into force in 2007. We are therefore fully aware of our legal obligations. Our approach is to have a detailed knowledge of our products composition, so as to ensure their compliance with legal requirements.

After a detailed review of your inquiry, we can respond positively on most issues. However the wording of certain points does not allow us to sign this document as it is. For this reason, we answer your questions below:

Registration of substances in the frame of REACH (REACH, articles 6 and 7.1) :

In the meaning of REACH, RENATA SA is supplying your company with articles which are not releasing substances under normal conditions of use. Substances contained in such articles must not be registered in the frame of REACH.

As far as the continuity of the supply chain and the registration of substances by third parties are concerned, RENATA SA has asked to its suppliers to be informed if a substance should not be registered in the future. RENATA SA however considers that the existing procurement alternatives will guarantee the quality of its products.

Notification of substances in articles (REACH, article 7.2):

Following article 7.6 of REACH, the registration of the specific use of a substance provides an exemption to the obligation of notification to the ECHA. RENATA SA is currently working with its suppliers to ensure that its specific use of the substances in its products will be covered by an exposure scenario in the registration dossier submitted by third parties.

If an exemption cannot be invoked, RENATA SA will fulfill a possible obligation to notify a substance for articles it places on the market on its own. This does however not relieve RENATA SA's customers of their duties, in particular not from an obligation of filing a notification applicable to products placed on the market by the customer.

Duty to communicate information on substances in articles (REACH, article 33):

The electrolyte of lithium batteries (models CRXXXX) contains 1,2-dimethoxyethane (CAS 110-71-4, EINECS 203-794-9) above 0.1% by weight.

[Guidance on safe use from ECHA Website](#)

Based on our present knowledge, the products supplied by RENATA SA to your company do not contain above 0.1% by weight one of the other 83 substances of the candidate list published by the European Chemicals Agency on its internet site until the 18th of June 2012.

[Candidate List of SVHC on ECHA Website](#)

Compliance of our products with REACH, Annex XVII:

The RENATA SA products are conforming to the restrictions imposed by the 76/769/EEC European Directive and which have been included in the Annex XVII of REACH.

We trust that these explanations will answer your request and stay at your disposal for any further question.

Itingen, July 16th 2012