

## **Kooltronic REACH Declaration**

This statement concerns European Union regulation 1907/2006 – Registration, Evaluation, Authorization and Restriction of Chemicals, also known as REACH, and applies to all Kooltronic Products.

Under REACH regulations we are considered a provider of "articles." All our products are assemblies, not raw materials. None of our products intentionally release substances to the environment. There are no Substances of Very High Concern (SVHC) in the Kooltronic products.

Given those conditions, our products are exempt from REACH pre-registration and later registration activities. We provide separate E.U. Reduction of Hazardous Substances (RoHS) documentation.

Our exempt status is based on our understanding of REACH as given in guidance document <a href="https://echa.europa.eu/documents/10162/2324906/registration\_en.pdf/">https://echa.europa.eu/documents/10162/2324906/registration\_en.pdf/</a>, all the 235 Substances of Very High Concern (SVHC) lists published at <a href="https://echa.europa.eu/candidate-list-table">https://echa.europa.eu/candidate-list-table</a> on June 14, 2023, and our knowledge of materials used to manufacture our products.

Additionally, as an exporter, Kooltronic has neither the obligation nor the right to directly register substances.

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