

Letter number: **611050/001**
Aimed to: **EUROCIR Customers**
Subject: **Information about the compliance by EUROCIR with Environmental regulations**
Date: **January 05th 2016**

Dear customer,

EUROCIR has as a priority the full compliance with environmental regulations related to our activities, in order to ensure a safe use of PCBs by customers and end users, and protect the environment.

PCBs supplied by EUROCIR comply with directive **RoHS2** (2011/65/UE), except PCBs with finish surface "HASL Sn/Pb". Directive RoHS2 came into force on January/02/2013, and replaces RoHS (2002/95/CE).

EUROCIR try to require suppliers the absence of **Conflict Minerals**, and we collect information from suppliers of raw materials, gold/nickel finish, and alloy Sn/Pb o Sn lead free for HASL, in order to identify the origin and the smelter, by means internal questionnaires or the template EICC-GeSI. According to the information collected, nowadays PCB supplied by EUROCIR do not contain any metal derived from "Conflict minerals", mined from Democratic Republic of Congo or adjoining countries, (Columbite-Tantalite, Coltan, Niobium, Tantalum, Cassiterite (tin), Gold, and Wolframite (Tungsten), and their derivatives) in accordance with US law HR 4173. Our suppliers have to report us immediately any change. To answer customers, we can complete the EICC-GeSI template if it is required, with the updated information at this moment. EUROCIR can report this information by means template EICC-GeSI (we download periodically this template updated in last version from <http://www.conflictreesmelter.org/ConflictMineralsReportingTemplateDashboard.htm>), via Official Conflict Minerals website, <http://www.conflict-minerals.com> (our ID is 32750), or via customer website, according to customer requirements.

EUROCIR is considered as producer, importer of articles, and downstream user, and comply with directive **REACH** (nº 1907/2006). This regulation implies several procedures and requirements depending on the responsibilities of each actor, (registration, notifications to ECHA, report, authorisation (Annex XIV), restrictions (Annex XVII), specific uses of substances, etc.).

According to the last update of Candidate Substances List (**December 17th 2015**), our PCBs (articles) do not contain any **SVHC** (Substances of Very High Concern) above 0.1% w/w in article (7.2 REACH), so, is not needed to report information about the safe use related to these substances. If according with successive updates of the list, or changes in composition, PCBs exceed this tolerance threshold, we will report you immediately (article 33), indicating as a minimum the CAS number, and if the SVHC exceed the ton by year as total amount, we will notify to ECHA.

At the date of today, our PCBs do not contain SVHC, independently the composition, included at the last update of the annex XIV. No authorizations to ECHA are required.

If you are automotive company, you can request information about PCBs composition by means **IMDS**, where you will find more detailed information, as for example, weight of PCB, if one substance is SVHC, or declarable according to **GADSL** (Global Automotive Declaration Substances List), etc.

Our environmental management system is not certified under **ISO14001**, although is in compliance with the corresponding **Spanish regulations & laws** related to environment. Currently is not planned to certify this standard, neither **ISO50001** (energy efficiency), although we work continually in order to improve our environmental management, as for example, trying reduce environmental impact and minimizing waste generation, (improvements in our water-treatment plant, manufacturing processes, minimizing the consumption of chemicals and energy, etc).

We receive continually questionnaires and letters from our customers, sometimes very difficult and different from each other, and as general rule, we cannot complete all of them neither registering in websites. For this reason, we decided create this standard letter, due to it responds in a clear manner. For another questions related to the chemical composition of your products and/or regulations, we are at your disposal and will give you a specific answer.

EUROCIR has many different suppliers, with different size, inside or outside EU. It is a difficult task to receive answers from all suppliers in a brief deadline, especially from smaller suppliers, and suppliers outside EU, due to these regulations are usually difficult to understand and carry on for them. This letter does not constitute a warranty or legal commitment by EUROCIR, due to, is mainly based on supplier's responses, and there are questions of legislation that can be misinterpreted. In any event, the compliance is completely responsibility of our suppliers.

Please, feel free to send us any question or doubt to our contact persons, (Contact of REACH / Quality Auditor) Mr. Juan José Hernandez - juanjo.hr@eurocir.com / (Quality Manager) Mr. Manuel Morales - m.morales@eurocir.com, (Legal Department) Mr. Juanjo López - juanjo@eurocir.com, and/or you can contact directly to Sales Department. In any event, your question will be send to the corresponding responsible department.

Yours sincerely,