LEM

Life Energy Motion

REACH Compliance Statement

LEM Group is fully aware of the requirements of REACH, the European Regulation (EC) 1907/2006 concerning Registration, Evaluation, Authorization and Restriction of Chemicals, which specifies duties and obligations for companies in the European Union that manufacture or import substances on their own, in preparations or in articles.

LEM is the manufacturer and supplier of "articles" under REACH definitions and thus has the role and obligation of the "downstream user" according to Art.3(13). We do not manufacture or supply "substances" or "preparations" and our articles are not concerned by "intentional release of substances" during their normal or reasonably foreseeable conditions of use, therefore we are not required to pre-register or register the products we supply to you.

We believe that even though REACH is an EU regulation, LEM products are affected in all geographical regions and therefore we have decided to deploy the REACH requirements on a worldwide basis.

We have strengthened communications along the supply chain and our suppliers are required to deliver REACH compliant articles and materials. Nevertheless, we do not expect to disrupt the supply of materials used in our products or the supply of LEM products to our customers.

We are regularly monitoring the continuing additions of Substances of Very High Concern (SVHC) to the REACH Candidate List, which is the first step for eventual inclusion in Annex XIV (list of substances subject to authorization).

With regard to the Article 33 of the regulation and the *Duty to communicate information on substances in articles*, we declare that except Note 1, LEM products and packaging do not contain any SVHC declared by ECHA until **July 16th, 2019** above the threshold level.

The information above is accurate to the best of our current knowledge and is based on declarations of compliance from our suppliers.

Questions regarding the application of the REACH regulation at LEM can be addressed to your usual sales contact or to reach@lem.com .

Geneva, August 16, 2019

Simon Siggen
VP Operations

Frank Rehfeld
CEO

Note1:
In July 2018 Lead (CAS 7439-92-1) was included in the SVHC list. Although Lead used as an alloying element in Copper, Steel, Aluminium or in ceramics and glasses is exempt according to RoHS (series 6 and 7, see Annex III of 2011/65/EU), it is not exempt according to Reach. Even if the quantity of these parts is far below 1 t/a threshold and even if we can exclude exposure to humans or the environment during normal or reasonably foreseeable conditions of use, we would like to inform you that some metallic parts of our transducers contain Lead in concentration above 0.1% w/w.

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