

Dear Valued Customer,

In 2006 the EU passed the above referenced regulation, known as REACH, concerning the production and use of chemical substances. Under REACH, all companies manufacturing or importing chemical substances into the European Union in quantities of one ton or more need to register the substances. It was effective June 2007 with a phased in implementation.

Century Spring Corp. provides over 35,000 designs of cataloged off-the-shelf products as well as custom made springs. In the event of any REACH-listed articles, substances, and chemicals being used for production of our springs, these are affected by quantities which fall well below the limit values stipulated in REACH. Therefore, we do not require a registration, evaluation, or approval to the REACH directive.

Under our reading of the regulation and the additional communications from the European Chemicals Agency (ECHA), we believe that the products we sell do not need to be registered in their existing form. We are a manufacturer of "Articles". We do not manufacture "substances" or "preparations" and our articles do not involve the "intentional release of substances".¹

In communication with our vendors, we have been advised that the products they supply to us do not contain any significant amounts of 240 chemical compounds referenced on the List of Substances of Very High Concern (SVHC) through its latest release on 01/23/2024. The list of current candidate SVHC can be found at https://echa.europa.eu/candidate-list-table

Thus, as of the date on this statement, we believe the product supplied to you from Century Spring Corp., is in full compliance with this regulation. We will continue to monitor and update the REACH requirements in conjunction with our vendors.

Kenneth Dye

Kenneth Dye Quality Manager Century Spring Corp.

¹ We are relying in part on communications between the European Confederation of Iron and Steel Industries (EUROFER) and the ECHA. References to these communications as well as common REACH questions and answers are available on the EUROFER website: <u>www.eurofer.org</u>.