

Subject: **Regulation (EC) 1907/2006 REACH**

As you know on June 1, 2007 has come into force the Regulation (EC) No 1907/2006 REACH concerning the registration, evaluation and authorisation of chemicals.

This regulation foresees that manufacturers or companies that import from not EC Countries mere substances or preparations banned in a concentration equal or superior than 1 ton / year, must register these substances by ECHA (European Chemicals Agency).

Between June 1, 2008 and December 1, 2008 it is foreseen a transitory period for the "pre-registration", that will allow to the manufacturers/importers of substances/preparations to go on producing/importing their own products, also during the registration period, that will take place on the following years from 2010 up to 2018 (according to the production volumes and from the danger of the substances/preparations).

From December 1, 2011 manufacturers or importers of articles have to notify ECHA when their articles contain one or more substances mentioned on the Candidate List.

This obligation applies if the substance is present above 0,1% (w/w) and its quantities in the produced/imported articles are above 1 ton in total per year.

The business of our Group consists essentially in producing and trading products considered articles according to Art. 3 par. 3 of REACH Regulation and therefore it is not responsible for the selling to the market of substances or preparations or articles for the intentional release of substances (Art. 7 par 1). For this reason no safety data sheet is to be sent together with the shipments of our products (Art. 31 Par. 1 and 3).

Our Company has anyway put into action all the verifications with the suppliers of substances/preparations for checking if they made or are making the pre-registration. If not we will evaluate the possibility of searching alternative suppliers in order to always grant you the continuity of supplying you with goods of our production with the same quality levels and according to the standards in force.

We have also put into action all the activities aimed at checking if our products contain dangerous substances (i.e. carcinogen, mutagen, persistent substances and so on) and we confirm you that our policy in buying is aimed at systematically eliminating from our products all the substances that ECHA will mention as candidate substances and will include in the candidate list (SVHC Art. 57 Ref. Enclosure XIV).

We underline that our Group does not purchase directly any material mentioned in the candidate list and we have not presently received any information from our suppliers as concerns the possible presence of such substances in the preparations we buy for our production.

Eng. V. Shahbazians R & D Manager
January 27, 2012