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U.S. Robotics Corporation Communication Regarding EU REACH

REACH (EC No. 1907/2006 (Registration, Evaluation, Authorization and Restriction of Chemicals) is a European Union chemical regulation that entered into effect on June 1, 2007 with various requirements that will be phased in through 2018.

(1) Registration Requirement (Article 7.1)

In general, REACH requires an importer or producer of article(s) to register non – exempt substances contained in the articles(s) when the following conditions are met:

- (i) the substance is intended to be released from the article(s) during normal or reasonably foreseeable conditions of use; and
- (ii) the substance is present in the article(s) in quantities totaling over 1 ton per producer or importer per year.

(2) Notification Requirements (Article 7.2).

Beginning June 1, 2011, within six months after a substance has been found to meet the criteria in Article 57 and is included on the Candidate List of Substances of Very High Concern (SVCH) in accordance with the process set out in Article 59.1, importers and producers of article(s) must notify the European Chemicals Agency (ECHA) when certain exemptions are unavailable and the following conditions are met:

- (i) The substance is present in the article(s) in quantities totaling over 1 ton per producer or importer per year :and
- (ii) The substance is present in the article(s) above a concentration of 0.1% weight by weight (w/w).

(3) Communication Requirement (Article 33):

Once a substance has been included on the SVHC Candidate List, importers and producers (along with other suppliers) of articles containing the substance in a concentration (>0.1% w/w) are required to communicate certain information to recipients when next supplying article(s). This communication must provide sufficient information to allow safe use of the article including, as a minimum, the name of that substance.

Registration and notification under Article 7 is not currently required for substances in USR's products (articles). With regard to the Article 33 communication requirements, USR is currently partnering with its suppliers, and gathering information regarding the presence of SVHCs, to ensure that it can comply with any applicable communication requirements and assist its customers in complying with their respective requirements. If such SVCHs are identified by our suppliers, USR will make the required communications to its customers and assist them with complying with REACH in accordance with Article 33. As of the date of this letter, USR is not aware of the presence of any of the 151 SVCHs currently on the Candidate List that are present in a concentration greater than 0.1% weight by weight in any of our products.