

Statement on REACH Compliance

Our products would be considered an article under REACH. An article is an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition (e.g. manufactured goods such as textiles, electronic chips, furniture, books, toys, kitchen equipment, tubing, metal and plastic components). Our finished goods and components, made of stainless steel and other raw materials, would be considered as "articles".

Based on our research and correspondence with the European Chemical Agency (ECHA), an individual substance in an article is subject to the registration obligations only if it is present in the article in quantities over one tonne per year and the substance is **intended to be released** under normal or reasonably foreseeable conditions of use. The registration obligation applies to the producer of the article or, in case the article is imported, to the importer, insofar as the substance has not been registered for that use. In no case are the products we produce made with a regulatory substance that is intended to be released so we are exempt from REACH and would by default be in compliance with REACH regulations.

We have confirmed this with the International Trade Administration (ITA) as it relates specifically to our products. According to the ITA, for our products, REACH applies to chemical substance or products (called "articles" in the Regulation) that release chemicals into the environment during their normal use. REACH does not apply to solid raw materials such stainless steel and other products in the form that we use them or in our end products. Therefore, as previously stated, our products are exempt from the REACH requirements according to the International Trade Administration and, therefore, by default would be in compliance with REACH regulations.

Sincerely:



Edward Perry- VP, Quality & Regulatory

Dated: 1/17/2018