

## REACH Position Statement - October 28th 2008

- Definition of TDK-Lambda Products
  - Under the REACH EU regulation EC 1907/2006 products produced and offered for sale in EU by TDK-Lambda are defined as ‘Articles’
- Substances
  - No ‘substances’ are intentionally released from our Products during normal or reasonably foreseeable conditions of use therefore no requirement for TDK-Lambda to ‘Register substances’ exists.
- Notification of use of SVHCs ( Substances of very high concern )
  - TDK-Lambda already operates an extensive list of ‘banned substances’ in its products ( which includes , but is not limited to , substances controlled under the RoHS Directive ).
  - We are studying the SVHC ‘Candidate List’ issued on 28th October 2008 by ECHA ( European Chemical Agency) and will review our ‘Banned List’ accordingly. A verification process with our Supplier base is underway.
  - In the extremely unlikely event of a TDK - Lambda product containing SVHCs above 0.1% by weight ,and fulfilling the other criteria published in REACH Legislation , TDK-Lambda would comply with the notification procedures required to the authorities .

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- **Information on the composition of articles**
  - In the extremely unlikely event of a TDK - Lambda product containing SVHCs each above 0.1% by weight , TDK-Lambda would comply with the notification procedures to recipients required under REACH Legislation .
- **TDK-Lambda policy**
  - TDK-Lambda will continuously review the ECHA ‘Candidate List ‘ for additions and updates and act accordingly in compliance with REACH regulations .
  - In the extremely unlikely event that a TDK-Lambda product is found to contain SVHCs TDK-Lambda will use its best efforts to update the design and eliminate the SVHC.