

7/31/2023

RE: Compliance for European **REACH** Regulation – **235 SVHC**

NIC Components Corp is aware of REACH as a European Community regulation on chemicals. Currently NIC Components Corp supports the underlying goals of REACH, which are consistent with our own commitment to promote the responsible manufacturing, use and handling of hazardous materials and substances.

Registration of Substances:

After careful review of the legislation and specifically the definition of an "article" as defined in EC Regulation 1907/2006, Title II, Chapter 1, Article 7.1(a)(b), it is our current view NIC Components products would be considered as "articles". In light of the definition in §7.1(b) which requires registration of an article only if it contains a regulated substance that "is intended to be released under normal or reasonably foreseeable conditions of use," Our analysis is that NIC Components products constitute non-registrable articles for their intended and anticipated use.

Correspondence with Substances of Very High Concern (SVHC 235):

Per the candidate list of Substances of Very High Concern (SVHC) published June 14, 2023 NIC Components Corp. has reviewed these substances and certify all NIC Components series and component packaging are not intentionally used, no exposure of this material to humans, sum of SVHC material is less than one ton per year, and compliant per the EU "REACH" requirements of less than 0.1% (w/w) for each substance. In addition, NIC complies with the restrictions stated in Annex XVII of REACH.

If new SVHC candidates are published by the European Chemicals Agency, and relevant substances have been confirmed, that exceeds greater than 0.1% (w/w), NIC Components will provide updated compliance status.

Notice to Thick Film Chip Resistors and Lead Oxide:

1. Identified thick film resistors from NIC contain Diboron trioxide - B2O3 (CAS No. 1303-86-2) in raw materials, after a high-temperature process B2O3 and multiple constituents merge will transfer to glass, which is out of SVHC scope.
2. Identified thick film resistors from NIC contain Lead oxide - PbO (CAS No. 1317-36-8) in raw materials, after a high-temperature process PbO and multiple constituents merge will transfer to glass, which is out of SVHC scope.
3. NIC test reports may show product results with lead(CAS No. 7439-92-1) > 1000ppm, but there was not any metallic lead was added to all of raw materials and manufacturing processes, the result of lead concentration is from lead oxide in some raw materials, and lead oxide and multiple constituents merge will transfer to glass which is out of SVHC scope.
4. For a full list of NIC product series affected by notices 1 – 3 please visit www.niccomp.com/rohs

Prepared by the NIC Components Environmental Compliance Group

For any questions or comments regarding REACH, or any other environmental programs, please contact the Environmental Group at rohs@niccomp.com or visit www.niccomp.com/rohs

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