



CERTIFICATE OF RoHS COMPLIANCE

Epoxy Technology, Inc. hereby certifies that its products comply with the substance restriction requirements set forth in European Union Directive 2002/95/EC (RoHS Directive) as amended and updated and European Union Directive 2006/122/EC, such that EPO-TEK[®] brand products do not contain lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), decabromodiphenyl ether (Deca-BDE) or perfluorooctane sulfonates (PFOS).

Given the various requests for annual or ongoing testing, Epoxy Technology asks its customers to consider the following:

The UK Department of Trade and Industry (DTI) was tasked with implementing the RoHS Directives. DTI commissioned ERA Technology to perform a study of approaches to compliance. ERA's findings included the following points:

- Producers will need to be confident that there are no banned substances within any of their products that are covered by the RoHS directive but the Directive does not specify how this shall be done. Analysis of every component would be **unacceptably expensive**. Both producers and enforcement authorities need a simple low cost procedure to ensure that no banned substances are present.
- There is no universal procedure for all producers to comply with the regulations.
- **Self-declaration** (having manufacturers declare that their materials/products are in compliance) **is an appropriate procedure**
 - Producers can obtain an assurance from suppliers that no banned substances are present.
 - Producers can carry out limited analysis to verify declarations.
- Analysis of every component by all producers is clearly unreasonable, would be hugely expensive and may even be harmful to the environment and human health.
- A balance is required between the need to protect the environment and the taking of "reasonable steps" to comply with the Directive

Possible Compliance Approaches for Directive 2002/95/EC (The RoHS Directive); ERA Technology, Ltd.; April 2004.

RoHS Testing is available from Epoxy Technology, Inc for a fee.

A handwritten signature in black ink, appearing to read "Andrew R. Horne".

Andrew R. Horne
General Manager
January 2011