



## REACH Compliance Statement March 7, 2023

Dear Valued Customer:

This letter provides the compliance status of Wakefield Thermal products with the following directive(s) or regulation(s):

### Product/Article Declaration

REACH (EC 1907/2006)  
Candidate List of 233 Substances of Very High Concern

### Background

The acronym "REACH" stands for the "Registration, Evaluation, Authorization and Restriction of Chemicals". REACH is a European Union Regulation (No 1907/2006) which was entered into effect in June 2007. REACH is intended to improve the protection of human health and the environment through the identification and use of certain chemicals and chemical substances.

Wakefield Thermal provides a wide array of products, including thermal extrusions, LED heat sinks, heat frames and pipes, fans, heat exchangers, coolant distribution units, liquid cold plates, and other thermal management materials. Wakefield Thermal is considered a "Downstream User" of chemical substances by REACH regulatory definition. REACH (EC1907/2006) Chapter 2, Article 3 defines a Downstream User as: "a legal person established within the Community, other than the manufacturer or the importer, who uses a substance, either on its own or in a preparation, in the course of his industrial or professional activities". In addition to being a Downstream User, Wakefield Thermal products are incorporated and used as ingredients/raw materials into "article(s)". REACH considers the term article(s) as: "object(s) which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition".

As a Downstream User formulating products utilized in the production of articles, we are reliant on our upstream suppliers for the pre-registration / registration of our raw material chemical substances used in our production processes.

### Substances

Through REACH (EC1907/2006), the European Chemical Agency (ECHA) publishes an updated list periodically of chemical substance candidates considered to be "Substances of Very High Concern" (SVHC) through regulation. Articles containing SVHCs  $\geq$  .1 % by weight may be subject to reporting.

More information regarding REACH (EC1907/2006) and SVHCs as established on the ECHA candidate list can be found through the following link: <https://echa.europa.eu/candidate-list-table>.

## Wakefield Thermal Product(s)

Wakefield Thermal does not perform analytic testing on our products to determine any presence of REACH SVHCs. Wakefield Thermal bases its' knowledge on information provided by third parties and believes it to be true. To the best of our knowledge, unless listed below, the SVHCs published on the ECHA candidate list (<https://echa.europa.eu/candidate-list-table>) are not intentionally or knowingly used as ingredients in products manufactured by Wakefield Thermal. These substances are not expected to be present above the regulated threshold limits and our manufacturing processes are not expected to introduce or create these substances.

We appreciate your business. Please let us know if we can be of further assistance.

Richard J. Deshaies  
Regional Environmental, Health and Safety Manager

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