

Dear supplier,

**Reach**

Reach is the EU chemicals regulation. Reach distinguishes between substances, preparations and articles. Requirements apply mainly for substances and preparations, however certain rules apply for articles containing Substances of Very High Concern (SVHC-Substances).

We are required to inform our customers if there are substances on the Candidate List <http://echa.europa.eu/web/guest/candidate-list-table> at concentrations above 0.1 % (weight by weight) present in the articles we sell.

If a substance is identified as an SVHC, it will be added to the candidate-list for eventual inclusion in the Authorisation List, annex XIV.

- We therefore want you to guarantee us that you will keep yourself informed when the candidate list is updated.
- Review if one or more parts of your articles contain one or more substances listed on the Candidate List in concentrations above 0.1% weight by weight.
- Inform us if products contain the candidate list substances by completing Annex "Reporting substances on the Candidate List" and send it electronically to us. You as a supplier are responsible for continuously updating this annex and send the updates to us electronically.
- Until the SVHC-substance in the product is phased out by you, an instruction for safe handling with at least the substance name should be sent together with the article, if one or more parts of your articles contain one or more substances listed on the Candidate List in a concentration above 0.1% weight by weight.

Substance who has been included in Authorization list (Annex XIV) <http://echa.europa.eu/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list>, could not be used or put on the market without permission from the European Chemicals Agency ECHA.

The list of restrictions Annex XVII <http://echa.europa.eu/web/guest/addressing-chemicals-of-concern/restrictions/substances-restricted-under-reach> to Reach contains those substances (on its own, in a mixture or in an article) for which manufacture, placing on the market or use, is limited or banned in the European Union. We expect you to comply with Annex XVII.

We also expect that all substances that require registration, notification or authorisation and are contained in the products you are supplying to us will be handled in accordance with Reach and that your company will take organizational measures to manage the implementation of the Reach regulation requirements. We will in the supplier declaration follow up that you have a functioning routine for this process.

**RoHS 2 (2011/65/EU)**

The RoHS directive <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011L0065> regulates the use of certain substances in electrical and electronic equipment within the EU. Heavy metals such as lead, mercury, cadmium, and hexavalent chromium and flame retardants such as polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE) to be substituted by safer alternatives. We want you to inform us if any of your products would fall under the scope of the RoHS directive.

**Conflict Minerals**

Conflict minerals are minerals mined in conditions of armed conflict and human rights abuses. Conflict Minerals SEC Dodd Frank Section 1502 of the Dodd-Frank Act was signed into law on July 21, 2010. SEC Issuers must provide disclosure under Conflict Mineral Provision if "Conflict Minerals are necessary to the functionality or production of a product manufactured". Conflict Minerals include 3TGs (Tin, Tantalum, Tungsten and Gold) that are found to be financing conflict in the Democratic Republic of Congo (DRC) or an adjoining country [1] (collectively known as the "Covered Countries").

[1] A country that shares an internationally recognized border with the DRC, which presently includes Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

We don't want to have conflict minerals in our products. If any of the products you supply contain any of the "conflict minerals" please inform us. For more information:

Final Rules Link: <http://www.sec.gov/rules/final/2012/34-67716.pdf>  
SEC Fact Sheet Link: <http://www.sec.gov/News/Article/Detail/Article/1365171562058>  
SEC FAQ: <http://www.sec.gov/divisions/corpfin/guidance/conflictminerals-faq.htm>

You hereby confirm that you meet the above requirements.

Date:

2019/03/25

Company stamp

Company:

VARTA Consumer Batteries

e-mail / Telephone no

uwe.knoedler@eu.spect

Signature:

Reach-contact (subtitled)

UWE KNOEDLER



VARTA Consumer Batteries GmbH & Co. KGaA  
Alfred-Krupp-Str. 9 | 73479 Ellwangen | Germany  
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## Reporting of substances on the SVHC candidate list

Article number	Article description	Substance (SVHC candidate list)	CAS-Nr:	EC-Nr:	Weight percent
6203	PROF. LITHIUM 2CR5	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6205	PROF. LITHIUM CR123A	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6206	PROF. LITHIUM CR2	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6016	CR 2016	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6025	CR 2025	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6032	CR 2032	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6131	CR 1/3 N	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6216	CR 1216	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6220	CR 1220	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6231	V 28 PXL	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6320	CR 2320	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6430	CR 2430	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6450	CR 2450	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6616	CR 1616	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6620	CR 1620	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6632	CR 1632	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6103	ULTRA LITHIUM AAA	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6106	ULTRA LITHIUM AA	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1
6122	ULTRA LITHIUM 9V	1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)	110-71-4	203-794-9	>0.1

**There are no restrictions on distribution or use of the affected products.**

Ellwangen, 28th January 2019

### REACH Regulation (EC) No. 1907/2006

Dear Sir or Madam,

As a manufacturer of commodities VARTA Consumer Batteries GmbH & Co. KGaA is, according to the REACH-regulation, considered as a "downstream user". As such "downstream user" VARTA Consumer Batteries GmbH & Co. KGaA underlies no compulsory registration subject to REACH.

In our own interest and in order to guarantee high product availability we pursue the implementation of REACH and the resulting requirements intensively. In this respect we contacted our sub-suppliers of chemical materials and preparations, which we use in our products and packaging materials processes, in order to ensure a registration.

Our articles (commodities) underlie the reporting requirements in accordance with article 33. This applies to commodities fulfilling the criteria's of article 57 and identified by article 59 and published by the agency ECHA on the Internet.

We are going to inform our customer within 45 days, if there are substances of very high concern (SVHC-substance) in the commodities in a concentration > 0,1 mass percentage.

At the moment, according to the current REACH Regulation (EC) No 1907/2006 our lithium products are affected by information requirements regarding SVHC substance.

All our lithium products contain > 0.1 weight percent 1,2-dimethoxyethane, ethylene glycol dimethyl ether (EGDME)

There are no restrictions on distribution or use of the affected products.

This is an ongoing process and we are willing to take all required measures in order to continue to provide our products with the usual high quality and security.

If you have any further questions concerning the implementation of the REACH- regulation in our company, please do not hesitate to contact me.

Yours faithfully

**Jürgen Balle**

- REACH Representative -

[J.Balle@eu.spectrumbrands.com](mailto:J.Balle@eu.spectrumbrands.com)