

Subject: REACH Compliance

Dear Customer,

This letter concerns Regulation (EC) No 1907/2006 on the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) compliance of MG Chemicals (MG) products.

SVHC-235 Statement (Candidate List for Inclusion in Annex XIV)

As of the latest June 14, 2023 update, the only MG products known to contain Substances of Very High Concern (SVHC's) candidates above reporting thresholds are listed in Table 1. For non-MG products that we distribute, please contact the original manufacturer for their REACH compliance declarations.

Table 1. MG Chemicals Products Containing Substance of Very High Concern above reporting threshold

<i>MG Part Number</i>	<i>Product Name</i>	<i>Substance</i>
419D-P-BL	Overcoat Pen Blue	0.17% nonylphenol, branched, ethoxylated CAS# 68412-54-4 (<i>Not for sale in EEA</i>) ^{a)}
832HD Part B	1:1 Epoxy Potting and Encapsulating Compound	41% 4-nonylphenol, branched CAS# 84852-15-3 (<i>Not for sale in EEA</i>) ^{a)}
832TC Part A and Part B	Thermal Conductive Epoxy	None: <i>reformulated in 2019</i> ^{b)}
1035-85ML, 1035-85MLCA	Premium RTV Silicone Adhesive Sealant	<1% octamethylcyclotetrasiloxane CAS# 556-67-2 <1% decamethylcyclopentasiloxane CAS# 541-02-6 <1% dodecamethylcyclohexasiloxane CAS# 540-97-6 ≤1% dibutylbis(pentane-2,4-dionato-O,O')tin CAS# 22673-19-4 (<i>Not for sale in EEA</i>) ^{a)}
4140A-P	Flux Remover Pen	24.8% decamethylcyclopentasiloxane CAS# 541-02-6 0.3% octamethylcyclotetrasiloxane CAS# 556-67-2
4223F	Premium Polyurethane Conformal Coating	0.2% tris(nonylphenyl) phosphite CAS# 26523-78-4
4860-4867	Sn63Pb37 No Clean Solder Wire	36.2% lead CAS# 7439-92-1
4860P	Sn63Pb37 No Clean Solder Paste	33% lead CAS# 7439-92-1 (<i>Not for sale in EEA</i>) ^{a)}
4870-4877	Sn60Pb40 No Clean Solder Wire	38.8% lead CAS# 7439-92-1 (<i>Not for sale in EEA</i>) ^{a)}
4880-4888	Sn63Pb37 RA Solder Wire	36.2% lead CAS# 7439-92-1 (<i>Not for sale in EEA</i>) ^{a)}

a) Not for sale in the European Economic Area (EEA)

b) The 832TC Part A and Part B were reformulated to remove the 1-methyl-2-pyrrolidinone (NMP). The 832TC products with production date past 10 May 2019 (Batch number 19 130A and 19 130B) and above do not contain NMP or any other SVHC.

Table 1. (continued) MG Chemicals Products Containing Substance of Very High Concern above reporting threshold

<i>MG Part Number</i>	<i>Product Name</i>	<i>Substance</i>
4890-4898	Sn60Pb40 RA Solder Wire	39.5% lead CAS# 7439-92-1 (<i>Not for sale in EEA</i>) ^{a)}
8329TCM Part B	Medium Cure Thermally Conductive Adhesive	10% 4-nonylphenol, branched and linear CAS# 25154-52-3 (<i>Not for sale in EEA</i>) ^{a)}
8329TFM Part B	Medium Cure Thermally Conductive Adhesive, flowable	2.6% 4-nonylphenol, branched and linear CAS# 25154-52-3 (reformulated as 8349TFM) ^{c)}
8330 Part B	Medium Cure Silver Conductive Adhesive	18% 4-nonylphenol, branched CAS# 84852-15-3 0.4% 4,4'-isopropylidenediphenol CAS# 80-05-7 (<i>reformulated as 8330D</i>) ^{d)}
8331 Part B	Silver Conductive Adhesive, Moderate Cure / High Conductivity	22% 4-nonylphenol, branched CAS# 84852-15-3 0.8% 4,4'-isopropylidenediphenol CAS# 80-05-7 (<i>reformulated as 8331D</i>) ^{d)}

NOTE: The candidate list can be checked online at <https://echa.europa.eu/candidate-list-table>

c) Not for sale in the European Economic Area (EEA). New SVHC-free replacements are now available with catalogue numbers 8349TFM-25ML and 8349TFM-50ML, respectively.

d) Not for sale in the European Economic Area (EEA). New SVHC-free replacements are now available with catalogue numbers 8330D-19G, 8330D-160G, 8331D-14G, and, 8331D-120G, respectively.

REACH Annex XIV Authorization List

As of the latest list published, the 419D-P-BL products contain a substance currently listed in Annex XIV Authorization and is not for sale in the European Economic Area (EEA).

- nonylphenol, branched, ethoxylated (CAS# 68412-54-4)

Note: The 4-nonylphenol, branched with CAS# 84852-15-3 or 25154-52-3 contained in some of our products isn't ethoxylated, so the authorization related to "4-Nonylphenol, branched and linear, ethoxylated" doesn't apply.

REACH Annex XVII Restriction List

As of the latest list published, the products in Table 2 may trigger substance-specific restrictions for some uses. Please refer to the appropriate clause in the regulation for full details.

Table 2. Products with substance-with specific Annex XVII restrictions

<i>Product Name</i>	<i>Clause</i>	<i>Restriction Summary</i>
841/841AR Super Shield Nickel Conductive Coating	27. Nickel	Not for use in articles inserted or in direct or prolonged contact with human body
841ER Super Shield—ER Nickel Epoxy Conductive Coating	27. Nickel	Not for use in articles inserted or in direct or prolonged contact with human body
841WB Super Shield Nickel Conductive Coating	27. Nickel	Not for use in articles inserted or in direct or prolonged contact with human body
419D-P-BL Overcoat Pen—Blue	46a. 4-Nonylphenol, branched and linear, ethoxylated	Not for use in washable textile articles in concentration greater than 0.01%
419C Acrylic Conformal Coating	48. Toluene	Industrial Use Only
422B Silicone Modified Conformal Coating	48. Toluene	Industrial Use Only
4226 Super Corona Dope	48. Toluene	Industrial Use Only
1035 Premium RTV Silicone Adhesive Sealant	70. Octamethylcyclotetrasiloxane & Decamethylcyclopentasiloxane	Not for use in “wash-off cosmetic products” at >0.1% by weight

The listed products with toluene at greater than 0.1% shall not be placed on the market as a spray paint for supply to the general public. These are INDUSTRIAL USE ONLY products.

Products with nickel are not to be used for body piercing or for articles in direct or prolonged contact with skin due to possible sensitization.

REACH Article 33 Disclosure

As of this date MG Chemicals does not contain products that are considered to be articles with the following conditions:

- The substance is included in the Candidate List for Authorisation, and
- The substance is present in the articles placed on the market in a concentration above 0.1% (w/w).

REACH Registration

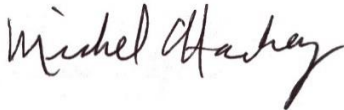
MG Chemicals currently has registered isopropyl alcohol (IPA) in the >1 t to 10 t band. Other than the IPA, MG does not import one ton of any individual substance to the European market and is, therefore, neither required nor eligible to register any other substances under REACH at this time. European customers of MG can continue to use our products as long as their total usage of any particular substance contained in these products remains under the one-ton threshold.

If you are a user or potential user of an MG product in Europe and you feel your future consumption of a substance may exceed the one ton threshold, please contact us as soon as possible so that we have adequate time to register our substances to meet your needs.

It is important to note that polymers are exempt from REACH registration, so if MG's epoxies are used in a manufacturing process outside of Europe and then the cured product is shipped into Europe, the cured product is exempt from REACH registration requirements (although the restrictions on SVHC's remains).

MG is a reporting downstream user for many substances. For example, many of our epoxy resins and hardeners also contain components that are pre-registered by our suppliers, allowing downstream reporting. Other products will be dealt with on an "as need" basis.

European customers that act as importers should take note that the ultimate responsibility for registration may fall on them where MG hasn't yet met the one ton threshold. Customers must calculate the total quantities of individual substances used from different suppliers to determine if their usage exceeds the one ton threshold, triggering registration requirements.

A handwritten signature in black ink that reads 'Michel Hachey'.

Michel Hachey, Ph.D.
Director of Regulatory and Scientific Affairs
MG Chemicals Ltd
Level 2, Vision Exchange building,
Territorials Street, zone 1, Central Business District
Birkirkara CBD 1070
Malta

Email: sds@mgchemicals.com
Phone: +(1) 905 331 1396 Ext 1027 or +(44) 1663 362888