

RoHS and REACH Compliance Declaration (December 2010)

Dear valued Southco customer,

Southco is dedicated to serving you by providing high quality engineered access hardware solutions that meet environmental regulations, including RoHS (Restriction of Hazardous Substances) Directive, EU Directive 2002/95/EC, and REACH (Registration, Authorisation and Restriction of Chemicals, European Union Regulation (EC) 1907/2006). We are providing you the following information to assist you in meeting your environmental policies and procedures.

Unless stated specifically in attached International Materials Data System (IMDS) reports, the parts that Southco supplies to you contain hazardous materials below the threshold in RoHS and REACH legislations. Where hazardous material concentrations are above RoHS and REACH thresholds, they are noted in the IMDS reports. No IMDS reports will be supplied, unless expressly requested, where the hazardous material contents are below RoHS and REACH thresholds.

The environmental regulations change constantly. We will try our best to keep you abreast of changes that affect Southco products by periodically updating this letter. Please refer to the current version of this letter on www.southco.com.

RoHS Compliance

- Southco has been producing parts that are RoHS compliant for the last several years. A majority of Southco products are RoHS compliant. All Southco products that are compliant with the RoHS Directive are marked “**RoHS COMPLIANT.**” RoHS COMPLIANT means that the substances restricted by the RoHS Directive are not contained in a finished product above threshold limits stated below unless the restrictive substance is subject of an exemption contained in the RoHS Directive. Southco cannot guarantee that inventory held by distributors or other third parties is RoHS compliant.

Restricted Substance	Maximum Threshold Limit
Cadmium and its compounds	100 ppm (0.01 weight %)
Mercury and its compounds	1000 ppm (0.1 weight %)
Hexavalent chromium and its compounds	1000 ppm (0.1 weight %)
Lead and its compounds *	1000 ppm (0.1 weight %)
Polybrominated biphenyls (PBB)	1000 ppm (0.1 weight %)
Polybrominated diphenyl ethers (PBDE)	1000 ppm (0.1 weight %)
Decabromine diphenyl ether (DECA BDE)	1000 ppm (0.1 weight %)

* Except when allowed by the Directive. For example, 3500 ppm in steel, 4000 ppm in aluminum alloys and 40000 ppm in copper alloys.

- Certain customers require parts that are not RoHS compliant. Southco produces these parts but their manufacturing, storage and handling is completely segregated from the RoHS compliant parts to minimize contamination of the RoHS compliant products.

- The compliance of Southco products with RoHS is affected through:
 - Strictly controlling the materials and finishes that are used in our products
 - Periodic audits of our suppliers to insure compliance
 - Periodic analysis, on an as-needed basis, of our products.
- The compositional information of our products is posted on the International Materials Data System (IMDS) and customers are encouraged to utilize this resource to get more information on Southco products. The IMDS data can be accessed through www.mdsystem.com
- Customer requiring more information on Southco products and their RoHS compliance are advised to contact rohs@southco.com or Thomas V. Aukzemas at 610-459-4000.

REACH Compliance

In June 2007, the European Union Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) entered into force. This Regulation establishes specific duties and obligations on companies in the European Union (EU) that manufacture or import substances on their own, in preparations, or in articles.

- Under the structure of the REACH Regulation, Southco is a manufacturer and supplier of “**articles**” to our EU customers through several Southco entities located within the EU. We do not manufacture or supply “substances” or “preparations” and our articles do not involve the “intentional release of substances”. Accordingly, we foresee no registration or pre-registration requirement for the products we supply to you.
- Southco believes that even though REACH is an EU regulation, the Southco products are affected in all geographical regions. Therefore, Southco has put together a global team to implement REACH on a worldwide basis.
- Southco is constantly monitoring the substances of very high concern (SVHC), as defined by REACH, in our products. This will be an on-going process since the complete list of SVHCs will be released in stages.
- The customers are encouraged to visit the following site to get the most up to date information on current list of SVHCs under REACH:

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

- Southco has decided to use International Material Data System (IMDS) to report compositional information, including presence and concentration of SVHCs, in our products. Since this is constantly evolving process, we will be regularly updating the IMDS information on Southco products as European Chemical Agency publishes future lists of SVHCs. The information in IMDS is provided by Southco on a reasonable effort basis using the information provided by our suppliers, published data and the documentation from the European Chemical Agency (ECHA). No attempt has been made to verify this information by third party analysis. Visit www.mdsystem.com to access IMDS data.

All enquiries related to REACH and SVHCs can be sent by e-mail to your regional Southco REACH contacts at either REACH_EU@Southco.com for European Union, Africa and Eastern Europe, REACH_NA@Southco.com for North and South America, or REACH_Asia@Southco.com for Asia and Australia. Our global REACH Coordinator, Thomas V. Aukzemas, and can be contacted at 610-459-4000.

We thank you for your continued support and understanding.

Sincerely,

A handwritten signature in black ink that reads "Albert J. Frattarola". The signature is written in a cursive style with a horizontal line crossing through the middle of the name.

Albert J. Frattarola
Director of Global Technology