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Reach Declaration of Compliance

Date

May 18, 2016

Xindao B.V. declares that the product:

P610.90 X2 pen

is compliant with REACH Regulation no 1907/2006:

- a. Restricted substances are not used in the item or are within legal limits as stipulated in the EU laws and regulations.
- b. The product is supplied by following the requirement of substances of very high concern (SVHC). The following SVHC substances may be contained in the item in the concentration of more than 0.1% by mass. Whether these substances are actually present in the item we cannot guarantee - it is our duty to provide information - even in the case of possible presence of some of the listed substances SVHC in the item.

Stoff	Eg Nummern	Cas Nummern
2-(2H-Benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV- 350)	253-037-1	36437-37-3
2-(2H-Benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328)	247-384-8	25973-55-1
2,4-di-tert-Butyl-6-(5-chlorbenzotriazol-2-yl)phenol (UV-327)	223-383-8	3864-99-1
Bis(pentabromphenyl)ether (DecaBDE)	214-604-9	1163-19-5
Cyclohexan-1,2-dicarbonssäureanhydrid	201-604-9	85-42-7
(Hexahydrophthalsäureanhydrid)cis-Cyclohexan-1,2-	236-086-3	13149-00-3
dicarbonssäureanhydridtrans-Cyclohexan-1,2- dicarbonssäureanhydrid	238-009-9	14166-21-3
Hexahydromethylphthalsäureanhydrid,Hexahydro-4-	247-094-1	25550-51-0
methylphthalsäureanhydrid,Hexahydro-1-	243-072-0	19438-60-9
methylphthalsäureanhydrid,Hexahydro-3-	256-356-4	48122-14-1
methylphthalsäureanhydrid	260-566-1	57110-29-9
1,2-Benzoldicarbonssäure, Di-C7-11-verzweigte und lineare Alkylester (DHNUP)	271-084-6	68515-42-4
Diisobutylphthalat (DiBP)	201-553-2	84-69-5

[4-[[4-Anilino-1-naphthyl][4-(dimethylamino)phenyl]methylen] cyclohexa-2,5-dien-1-yliden] dimethylammoniumchlorid (C.I. Basic Blue 26) [mit ≥ 0.1% of Michler's Keton (EG Nr. 202-027-5) bzw. Michler's Base (EG Nr. 202-959-2)]	219-943-6	2580-56-5
[4-[4,4'-Bis(dimethylamino) benzhydryliden]cyclohexa-2,5-dien-1-yliden]dimethylammoniumchlorid (C.I. Basic Violet 3) [mit ≥ 0.1% of Michler's Keton (EG Nr. 202-027-5) bzw. Michler's Base (EG Nr. 202-959-2)]	208-953-6	548-62-9
1,2-Benzoldicarbonsäure, dipentylester, verzweigt und linear	284-032-2	84777-06-0
1,3,5-Tris(oxiranylmethyl)-1,3,5-triazin-2,4,6(1H,3H,5H)-trion, TGIC	219-514-3	2451-62-9
1,3,5-Tris[(2S and 2R)-2,3-epoxypropyl]-1,3,5-triazin-2,4,6- (1H,3H,5H)-trion (β-TGIC, TEPIC-H)	423-400-0	59653-74-6
4-(1,1,3,3-Tetramethylbutyl)phenol, ethoxyliert [einschließlich genau definierter Stoffe und UVCB Stoffe, Polymerer und Homologe]	219-682-8	2315-67-5 2315-61-9 9002-93-1 2497-59-8
4,4'-Bis(dimethylamino)-4''-(methylamino)tritylalkohol [mit ≥ 0.1% of Michler's Keton (EG Nr. 202-027-5) bzw. Michler's Base (EG Nr. 202-959-2)]	209-218-2	561-41-1
4,4'-Bis(dimethylamino)benzophenon (Michler's Keton)	202-027-5	90-94-8
4,4'-Methylendi-o-toluidin;	212-658-8	838-88-0
4-Aminoazobenzol; 4-Phenylazoanilin, Anilingelb	200-453-6	60-09-3
4-Aminobiphenyl, Biphenyl-4-ylamin, Xenylamin	202-177-1	92-67-1
4-Methyl-m-phenylendiamin (2,4-Toluyldiamin)	202-453-1	95-80-7
4-o-Tolylazo-o-toluidin, 4-Amino-2',3-dimethylazobenzol, Echtgranat-GBC-base, o-Aminoazotoluol; C.I. Solvent Yellow 3	202-591-2	97-56-3
6-Methoxy-m-toluidin (p-Cresidin)	204-419-1	120-71-8
Bleichromat	231-846-0	7758-97-6
Bleichromatmolybdatsulfatrot (C.I. Pigment rot 104, C.I. 77605)	235-759-9	12656-85-8
Bleisulfochromatgelb (C.I. Pigment gelb 34), C.I. 77603	215-693-7	1344-37-2
Cadmiumchlorid	233-296-7	10108-64-2 7790-78-5
Dibortrioxid (Borsäure)	215-125-8	1303-86-2
Dinatrium-3,3'-[[1,1'-biphenyl]-4,4'-diylbis(azo)]bis(4-aminonaphthalin-1-sulfonat) (C.I. Direct Red 28)	209-358-4	573-58-0
Dinatrium-4-amino-3'-[[4'-[[2,4-diaminophenyl]azo][1,1'-biphenyl]-4-yl]azo]-5-hydroxy-6-(phenylazo)naphthalin-2,7-disulfonat (C.I. Direct Black 38)	217-710-3	1937-37-7
N,N,N',N'-Tetramethyl-4,4'-methyldianilin (Michler's Base)	202-959-2	101-61-1
N,N-Dimethylformamid	200-679-5	68-12-2
N-Pentyl-isopentylphthalat		776297-69-9
o-Toluidin, 2-Aminotoluol	202-429-0	95-53-4
α,α-Bis[4-(dimethylamino)phenyl]-4 (phenylamino)naphthalin-1-methanol (C.I. Solvent Blue 4) [mit ≥ 0.1% of Michler's Keton (EG Nr. 202-027-5) oder Michler's Base (EG Nr. 202-959-2)]	229-851-8	6786-83-0
4-Nonylphenol, verzweigt und gradkettig [Stoffe mit einer gradkettigen und/oder verzweigten Alkylkette mit einer Kohlenstoffanzahl von 9 kovalent an Phenol in Position 4 gebunden (para), einschließlich UVCB- und genau definierten Stoffen, die alle individuellen Isomeren einschließen sowie Gemische davon]	284-325-5 247-770-6 203-199-4 241-427-4 250-339-5 257-907-1	84852-15-3 26543-97-5 104-40-5 17404-66-9 30784-30-6 52427-13-1 186825-36-5 142731-63-3
4-Nonylphenol, verzweigt und gradkettig, ethoxyliert [Stoffe mit einer gradkettigen und/oder verzweigten Alkylkette mit einer Kohlenstoffanzahl von 9 kovalent an Phenol in Position 4 gebunden, ethoxyliert, einschließlich UVCB- und genau definierten Stoffen, die alle individuellen Isomeren einschließen sowie Gemische davon]	230-770-5 243-816-4 248-743-1	26027-38-3 7311-27-5 20427-84-3 34166-38-6 27942-27-4 14409-72-4
Benzylbutylphthalat (BBP)	201-622-7	85-68-7
Dibutylphthalat (DBP)	201-557-4	84-74-2
Dihexylphthalat (DnHP)	201-559-5	84-75-3

For further questions on the subject of SVHC, please contact your contactperson at product@xindao.nl

The list is based on the current state of knowledge and experience. Investigations in our products we carry out only in exceptional cases.

Trace impurities were not considered. A legal binding assurance of certain properties or the suitability for a particular for purpose of cannot be derived from our information. Existing laws and regulations have to be observed by the receiver of our products under their own responsibility. We are under no obligation to update due to changed requirements or new findings this opinion.

Signature

Stamp



REACH

REACH is the European Community Regulation on chemicals and their safe use (**R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemical substances). REACH is a standard for regulating chemicals and substances in all articles. All products for EU has to be compliant with REACH.

REACH, SVHC

SVHC (**S**ubstance of **V**ery **H**igh **C**oncern), that are included in REACH and this number of SVHC list is changing as substances are added. Following rules apply:

1. If the SVHC content in the product is <0.1% of the total item weight and total amount that the importing company is importing is <1 ton/year , there is no notification necessary.
2. If the SVHC content in the product is <0.1% of the total item weight and total amount that the importing company is importing is >1 ton/year , there is no notification necessary.
3. If the SVHC content in the product is >0.1% of the total item weight but the amount that the importing company is importing is <1 ton per year, the company should inform the supply chain about this fact on request. Doing a test is not mandatory but it is obliged to confirm in writing that the content of substance x present in the item is >0.1% of the weight. However, if the customer asks for a test report, this can be made but the costs will be charged to the customer.

Notification information includes: identify of registrant, identify of substance, registration number (if available), classification and labelling, description of use (substance & article), tonnage range (the importing company should have a report / statement available within 45 days after delivery)

4. If the SVHC content in the product is >0.1% of the total item weight and total amount that the importing company is importing is >1 ton/year , the substance shall be notified to ECHA.

SVHC content in article	Export Amount of SVHC per year	Action need to do
< 0.1%	< 1 ton/year	none
< 0.1%	> 1 ton/year	none
> 0.1%	< 1 ton/year	Information transmission in supply chain
> 0.1%	> 1 ton/year	Notification to ECHA

At Xindao we do not have any SVHC substances which we import > 1 ton /year

REACH Annex XVII

This is the restricted substance list. These substances, such as low cadmium/AZO in bags are tested by us. The covered substances in the product must meet the European requirements. It is not permitted to sell the product if any covered substance fail the requirement or limit specified in Annex VXII in REACH. At Xindao we have these related test reports available on our webshop.