

To our customers

HNG-QM
Contact Name: Dr. Bodo Wand
Phone + 49 6181 35-5925
Fax + 49 6181 35-16 5925
bodo.wand@heraeus.com
www.heraeus.com

May 28, 2018

The Restriction of Hazardous Substances in Electrical and Electronic Equipment EU-Directive 2011/65/EU from June 8th, 2011 (RoHS II)

Dear Ladies and Gentlemen,

The European Union (EU) Directive 2011/65/EU on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS II), prohibits placing on the EU market new electrical and electronic equipment (EEE) defined in categories in Annex I of the directive, that contains more than a defined value per homogenous substance of the product from lead (0,1%), mercury (0,1%), hexavalent chromium (0,1%), polybrominated biphenyl (PBB) and polybrominated diphenyl ether (PBDE) flame retardants (0,1%) or cadmium (0,01%).

In principle our "Specialty Lighting" Discharge Lamps are in scope of RoHS II as they belong to category 5, "Lighting equipment", as defined in Annex I. But concerning the use of mercury for creating the plasma they are all generally exempted from RoHS II (see Annex III of 2011/65/EU, Exemption 4f).

Moreover there are no other components used in those lamps, which are, "hazardous substances" in the sense of RoHS (lead, cadmium, hexavalent chromium, polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE)).

As a result, Gas Discharge Lamps from Heraeus Noblelight GmbH are fully RoHS II compliant.

Time limitation for Exemptions

Directive 2011/65/EU (RoHS II), which came into force on 21st July 2011, is time limited in its validity, which means that RoHS II Annexes undergo a revision process at least every 5 years (see article 5 in RoHS II), therefore the latest date is 21st July 2016.

Moreover some of the exemptions defined in RoHS II are, themselves, time-limited (for details see Annex III-IV). Our UV mercury vapor bulbs are exempt from RoHS II by using the

Page 2

exemption “mercury in other discharge lamps for special purposes not specifically mentioned in this Annex” (which is Exemption 4f in Annex III, see above). This exemption will expire on July 21st 2016, unless renewed.

Requests to renew an existing exemption must be submitted 18 months before the exemption expires and must include a lifecycle analysis of possible alternatives; a description of WEEE implications; and a plan for developing, requesting the development, or using possible alternatives.

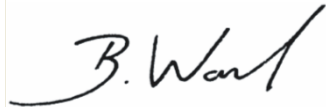
A consortium of lamp producers, whose products are covered by Exemption 4f did timely, before the end of 2014, submit a strong Application for Renewal of the Exemption to the Oeko Institute, the body appointed by the EU Commission to review all such Applications and make recommendations to the EU Commission.

Up to today the recommendation of the Oeko-Institute is not given to the European Commission. Therefore the whole procedure is postponed and a renewal is not to be awaited before the end of 2018.

In the meantime the actual given exemption for mercury in specialty UV lamps is still given.

Heraeus Noblelight GmbH is currently reviewing Directive (EU) 2015/863 amending Annex II to above mentioned directive.

Best regards,

A handwritten signature in black ink, appearing to read "B. Wand", is written over a thin horizontal line.

Dr. Bodo Wand