

Warner Electric's position on the European Union's RoHS Directive

The European Union's Restriction of Hazardous Substances (RoHS) Directive mandates that manufacturers of certain types of products must, by July 1, 2006, be able to demonstrate their products contain only minimal levels of the following hazardous substances: lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyl and polybrominated diphenyl ether.

The RoHS directive does not apply universally to all products. Warner Electric is not aware of any of our customers that are required to comply with RoHS, based upon the eight RoHS categories described below.

RoHS primarily targets consumer products and *applies* to eight categories of product:

- Large household appliances – No Warner Electric products in this class.
- Small household appliances – No Warner Electric products in this class.
- IT and telecom equipment – We are not aware of any products in this class.
- Consumer electronics – No Warner Electric products in this class.
- Lighting equipment – No Warner Electric products in this class.
- Toys, leisure and sports equipment – We are not aware of any products in this class.
- Automatic dispensers– We are not aware of any products in this class.
- Electrical and electronic tools¹ – This is potentially the most applicable category.

There are a number of exemptions within the electrical and electronic tools category and as far as we can determine our customers fall under one or the other of two of them. The exemptions are as follows:

RoHS Directive Exemptions:

- Products where electricity is not the main power source. Lawn and garden equipment using gasoline engines, falls under this exemption and is specifically listed in European Union documents.
- Large-scale stationary industrial tools, where intended use is fixed industrial applications.² Warner Electric Industrial products, including controls, fall under this exemption.

¹ These are described as, “drills; saws; sewing machines; equipment for turning, milling, sanding, grinding, sawing; cutting; shearing; drilling; making holes; punching; folding; bending or similar processing of wood, metal and other materials; tools for riveting, nailing or screwing or removing rivets, nails, screws or similar uses; tools for welding, soldering or similar use; equipment for spraying, spreading, dispersing or other treatment of liquid or gaseous substances by other means; tools for mowing or other gardening activities.

² These are described as, “machines or systems, consisting of a combination of equipment, systems, finished products and/or components, each of which is designed to be used in industry only, permanently fixed and installed by professionals at a given place in industrial machinery or in an industrial building to perform a specific task.”

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Although we believe the RoHS directive does not apply to the types of products manufactured by our customers Warner Electric is in agreement with the general purpose and spirit of the directive and is working to bring the content of the six restricted substances in our products within RoHS guidelines.

We have eliminated lead based solder from our coils, we have eliminated all cadmium plating from our parts, and we are eliminating hexavalent chromium (in the form of yellow chromate dip of zinc plated parts) from our parts. We do not specify any of the other restricted substances in our product. However there may be restricted materials in products we purchase, such things as: wire insulation, bearing grease, potting compound, etc. We are working to identify these materials and asking suppliers for certificates of compliance for their product.

Warner Electric is committed to supplying RoHS compliant parts to our customers within the scope of the European Union Legislation However, we may not be fully compliant by July 1st.

Compliance will be based on the information provided to Warner Electric by our suppliers. Warner Electric makes no independent representations or warranties, expressed or implied, and assume no liability in connection with the use of this information.

The contact point at Warner Electric to register your RoHS requirements is the Warner Electric customer service department.