



RoHS 3 and REACH Compliance

May 8, 2019

RoHS 3 COMPLIANCE STATEMENT

It is Dakonte Product Group, Inc's (DPG) (dba as TIE Officemates) understanding that the European RoHS3 Directives are meant to regulate manufacturers of electrical and electronic equipment. Specifically, the European Parliament Directive 2015/863 entitled "on the restriction of the use of certain hazardous substances in electrical/electronic product, device or equipment", restricts or prohibits the use of cadmium (Cd), lead (Pb), mercury (Hg), hexavalent chromium (Cr(VI)), polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs), along with bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP), and diisobutyl phthalate (DIBP).

DPG is not a manufacturer of electrical or electronic products, devices or equipment and therefore its products are not required to comply with RoHS3 legislation. However, in the event DPG products were considered a component of a finished regulated product made by a DPG customer, based on DPG supplier information the materials used in TIE Officemates products comply with RoHS limits. Furthermore, none of the listed substances are purposefully added during the assembly of TIE Officemates products by DPG. Thus, RoHS regulated substances are not expected to be in TIE Officemates products, and any trace impurities of these substances would not be expected to exceed RoHS specified regulated limits.

REACH COMPLIANCE STATEMENT

European Union regulations governing Registration, Evaluation, Authorization and Restriction of Chemical Substances (REACH), would govern our products as being defined as 'articles'. REACH's Article 7 defines requirements for the "Registration and notification of substances in articles" and states that:

1. Any producer or importer of articles shall submit a registration to the Agency for any substance contained in those articles, if both the following conditions are met:
 - (a) the substance is present in those articles in quantities totaling over one tonne per producer or importer per year;
 - (b) the substance is intended to be released under normal or reasonably foreseeable conditions of use.

Based on REACH compliance information obtained from DPG suppliers, materials used in TIE Officemates products do not contain Substances of Very High Concern (revised January 15, 2019) exceeding the specific limits stated in the regulation. Furthermore, none of the substances listed are purposefully added by DPG during the assembly of TIE Officemates products. Thus, trace impurities, if any, of REACH regulated substances found in TIE Officemates products would not be expected to be above specified threshold limits, nor measurably contribute to the REACH Article 7 one tonne importer reporting threshold.

DPG does not routinely analyze its products or supplier materials for the presence of these substances. The statements above are made based on DPG manufacturing processes and DPG supplier compliance letters.

This statement is valid unless superseded by a revised version.

Sincerely,

Donald Hill, VP

May 8, 2019

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