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Dear Valued TriMark Customer:

In June 2007 the European Regulation (EC) 1907/2006 concerning the Registration, Authorization and Restriction of Chemicals (**REACH**) was first released. This Regulation establishes specific duties and obligations for 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, TriMark is a manufacturer and supplier of “articles” to our EU and UK customers.
- Health and safety executive (HSE) has implemented UK REACH in Great Britain (GB) effective from January 1, 2021. TriMark has a facility at Coalville, which is included in the GB territory.
- TriMark is constantly monitoring the substances of very high concern (SVHCs), 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 SVHC (Substances of Very High Concern) Candidate list is linked for your reference: <https://echa.europa.eu/web/guest/candidate-list-table>).
- Substances which are listed on the Authorization List published by the European Chemicals Agency (Annex XIV of the REACH regulations) cannot be manufactured or imported in the EU after a fixed date unless the ECHA authorizes the use of the substance for a specific use or uses.
- Substances in the list are selected from REACH SVHC list and they cannot be placed on the market or used after a given date (“sunset date”), unless an authorization is granted for their specific use, or the use is exempted from Authorization which list are selected from the REACH SVHC list titled “**Candidate List of Substances of Very High Concern (SVHC) for Authorization**” (**250 substances updated on 25 June 2025**) which is published by ECHA (European Chemical Agency) in accordance with Article 59(10) of the REACH Regulation. Companies may have immediate legal obligations following the inclusion of a substance in the Candidate List including in particular Articles 7, 31 and 33 of the REACH Regulation. TriMark utilizes the International Material Data System (IMDS) [www.mdssystem.com](http://www.mdssystem.com) and Compliance Data eXchange (CDX) by DXC Technology [www.cdssystem.com](http://www.cdssystem.com) to report compositional information, including the presence and concentration of SVHCs, in our products. Since SVHCs is a constantly evolving process, we will be regularly monitoring our products in IMDS and CDX as the European Chemical Agency publishes the list of additional SVHCs periodically. Please be advised that TriMark does not analyze for these substances and does not attempt to verify IMDS data by third party analysis. As a company concerned about the environment, we are active in limiting our use of chemicals,



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processes and materials that are not environmentally acceptable. We monitor our IMDS sheets closely regarding materials and chemicals used to meet all environmental regulations.

Pursuant to the European Union Registration, Evaluation, Authorization of Chemicals Regulation 1907/2006/EC (REACH), TriMark has an obligation to inform about certain substances contained in our products that are manufactured in or imported into the European Union. Where an article contains any substances of very high concern (SVHC) and is identified in a concentration above 0.1 % weight by weight (w/w), TriMark is obligated to provide sufficient information to allow safe use of the article including, as a minimum, the name of that contained substance.

Lead (CAS No. 7439-92-1) is a substance very commonly used in copper, brass, and steel alloys. The following TriMark Products do contain Lead (CAS No. 7439-92-1) in concentrations above the allowable limits:

- Keys: TriMark Product Code Designation 110-0105. These Products contain a Lead additive in the key material for machinability.

The main concerns regarding lead exposure are ingestion, inhalation, and physical contact. In normal conditions of use, users of TriMark Products can only come into physical contact with keys being the main concern. Contact with steel components and lock cylinders and the potential for permeation via skin is minimal as the lead is contained in a metal matrix.

All other substances contained in TriMark's products are currently in substantial compliance with the current conditions and restrictions of Annex XVII of the REACH Regulations.

This determination is based on information provided from suppliers, published data and other documentation which we believe to be reliable. In the future, if our monitoring and tracking of chemical use including the addition of any substances to the Substances of Very High Concern (SVHC) Candidate List, the Authorization List or Annex XVII of the **REACH** regulations indicates a change in our compliance with **REACH** regarding any product supplied to the customer, we will inform that customer according to the regulations and register appropriately within the guidelines of the **REACH** regulations. Product users are responsible for determining the applicability of REACH and other related Environmental Regulations based on their individual application/usage of the final product.

If further clarification is needed or you have specific questions, please do not hesitate to contact your TriMark representative or call us direct at 800-447-0343.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Hopp".

Lynn Hopp  
Senior Vice President