



GYS

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Laval, 17th February 2010

Subject: REACH – An overview of GYS situation

Dear Sir / Madam,

We would like to give you the latest update on our internal processes to take into account REACH (Registration, Evaluation and Authorization of Chemicals) in our manufacturing processes. REACH is a European law (1907/2006 dated December 18th, 2006) which imposes a better evaluation and registration of chemical substances in Europe. Eventhough the legal context is not completely structured, the law is valid since the 1st June 2007.

1. Classification of GYS in the REACH system

REACH classifies companies in four brackets:

- | | |
|---|---------------|
| - Manufacturers with production in the EU: | not concerned |
| - Importers importing goods from EU countries: | not concerned |
| - Distributors buying & selling goods in their countries: | not concerned |
| - End Users: | concerned |

GYS is classified as a end user as we are not a manufacturer of chemical substances and we are buying all chemical substances subject to REACH inside Europe.

2. Impact of REACH in our activity

REACH takes into account two types of substances: substances in preparations and substances included in a final item. After an internal audit made by a joint team from the quality and the purchasing departments, we have found these elements:

- **All substances and preparations that we buy come from EUROPE.** For GYS, the concerned products families are silicon, oil of cup, impregnation varnish, painting powder, paint, diluents, glue, cleaning agent, electrode, welding wire, flux cored wires, brazing creams, soldering cream and cooling liquid.
- **All 'released' items** (containing substances which are intentionally released during there normal life time use), come from EUROPE. The concerned products families are gas cylinder, liquid cooling, wire welding, flux cored wires, and sprays.

As we buy all of these families of products in Europe and as requested by REACH, we have asked our concerned suppliers to do a pre-registration of those substances.

3. Communication and information on “dangerous” substances

There is an obligation to communicate on goods containing dangerous substances, with consumption quantities above 1 ton per year and which concentrations are above 0.1%.

All of our suppliers have certified that they do not make use of substances contained in the first list* of 15 substances, published in October 2008.

An application is underway to our suppliers to ensure that their products do not contain any of the additional 14 substances identified in the extended list dated 13/01/2010.

* This list is available on the ECHA website at:

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

4. REACH contact

Our REACH managers in GYS are Philippe COLAS (p.colas@gys.fr) and Céline FOUILLET (c.fouillet@gys.fr).

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CEO