



Subject: **RoHS Certificate of Compliance**

4/30/08

Dear Valued Customer,

Copperfield and our key suppliers support the European Union Directive 2002/95/EC (RoHS) that restrict the use of certain hazardous substances in the design and manufacture of Electrical and Electronic Equipment.

#### RoHS Substances and Limits

The substances currently regulated by the RoHS Directive are listed below:

- Lead (Pb)
- Mercury (Hg)
- Cadmium (Cd)
- Hexavalent chromium (Cr+6)
- Polybrominated biphenyl (PBB) flame retardants
- Polybrominated diphenyl ether (PBDE) flame retardants (Deca-BDE exemption will be allowed to stand until June 30, 2008)

The maximum allowable concentration is 0.1% by weight in homogeneous material. For Cadmium, the maximum allowable concentration is 0.01% by weight in homogeneous material.

#### Labeling

RoHS Compliance to the above requirements applies to finished product bearing the RoHS compliance statement on the product tag. Older product not bearing the RoHS compliant statement on the tag may or may not be compliant.

#### Copperfield Manufactured Product Categories Awaiting Compliance

- Super Excelene Welding Cable

#### Copperfield Manufactured Product Categories in compliance until June 30, 2008

- 150C Irradiated Thin-wall XLPE primary automotive wire Per MS-9502
- 125C Irradiated XLPE battery cable
- 125C Irradiated Stainless steel resistance wire and type AEX primary wire

Note: Irradiated AWM is not affected by the recent annulment of Deca-BDE exemption by the European Court of Justice. Please feel free to inquire about compliance and timelines to specific parts relative to these product descriptions.

#### RoHS Technical Compliance Information

Compliance is determined from information and sources which Copperfield, LLC believes are reliable and from random sample testing of the above or similar products by outside accredited testing laboratories. The provided material content data, if applicable, is not to be considered a warranty or quality specification. Product users are responsible for determining the applicability of RoHS and other related environmental regulations based on their individual usage of the final product.



#### Independent Testing for RoHS Compliance

Testing of each product manufactured by Copperfield is not feasible nor is it practical. Providing test data or material declarations to prove compliance is not required in the legislation enacted by the EU Directive. Copperfield has submitted representative samples of product families to an independent A2LA lab for compliance testing. Testing will continue on a random basis to verify ongoing compliance. Suppliers have been asked to supply evidence of third party testing for materials purchased by Copperfield on a periodic basis to ensure ongoing compliance.

#### Test Criteria

Copperfield recognizes ICP/AAS, UV-Vis/IC, GC-MS technology (as applicable) as the most accurate and accepted test method for determining compliance to RoHS for wire and cable. Other test methods are considered less accurate and will not be accepted by Copperfield.

#### Spreadsheets for Compliance Documentation

Many customers are submitting requests for detailed and time consuming spreadsheets involving compliance data. The spreadsheets are coming to us in varying, unrelated formats that cannot be combined in order to satisfy numerous requests. As a result of this situation, Copperfield will provide the customer with a cost estimate for each spreadsheet submitted for completion. The cost of this spreadsheet will be passed on to the customer.

- Cost will vary depending on the complexity of the spreadsheet. Minimum cost will be \$75.00 per hour for research and spreadsheet completion. Lead times for return of information will be determined after review of spreadsheet for complexity and volume of parts. All requests will be addressed in the order that they are received.
- Any spreadsheets submitted back to the customer containing RoHS data entered by Copperfield will be issued in a PDF or otherwise locked format.

#### Return Policy for Non-Compliant Material

Copperfield will not authorize return of non-compliant material manufactured prior to RoHS compliant status.

Sincerely,

*Marcia Cook*

Marcia Cook  
Director of Quality