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To Whom It May Concern

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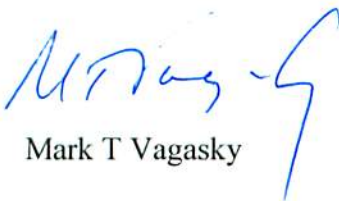
Compliance Statement: QualiChem, Inc. position regarding the European Union REACH Regulation

The European Union (EU) Regulation EC 1907/2006 concerning the Regulation, Evaluation, Authorization and Restriction of Chemicals (REACH) entered into force 1 June 2007.

We have evaluated the position developed by QualiChem to assist their EU clients in compliance with the REACH regulation. All substances used in products sold in the EU market have been pre-registered and will be registered by the QualiChem suppliers. QualiChem has / will provide the necessary information to said suppliers to allow registration of these substances as applicable for use by their EU downstream users. Additionally, there are no new substances formed in the formulation of QualiChem products which would require pre-registration / registration under REACH.

Accordingly we conclude that products produced by QualiChem may be imported into the EU in compliance with REACH for the defined uses in the metalworking industry.

With Kind Regards



Mark T Vagasky