

EDMUND A. GRAY COMPANY, Inc.
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RoHS EXEMPTION & COMPLIANCE

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STEEL, BRASS, PLASTIC, STAINLESS AND ALUMINUM PIPE NIPPLES
MALLEABLE IRON, BRONZE, MERCHANT STEEL AND COPPER PIPE FITTINGS

EXEMPTION

The Edmund A. Gray Company Inc, of Los Angeles, CA is in the business of manufacturing and distributing pipe nipples and distributing pipe fittings (flow control products) to wholesale stocking distributors in the plumbing, irrigation and waterworks industries. As such, our business focus and distribution channels exempt us from the scope of conditions covered in the EU's RoHS Directive (2002/95/EC, as amended by 2005/717/EC and 2005/747/EC).

Reasons

1. The Edmund A Gray Company does not manufacture or distribute electrical or electronic equipment (EEE).
2. Electrical or electronic components are not required to fulfill the primary function of any of our products.
3. Our plumbing products are "placed on the market" (if imported in the EU) separately from electrical and electronic equipment, therefore are not covered by or subject to the RoHS Directive.

Use of our products in a 'fixed installation'* would not be construed requiring compliance with the RoHS Directive, according to non-legally binding guidance issued by certain EU national authorities.

**The European Commission defines 'fixed installation' as a "combination of several equipment, systems, finished products and/or components (hereinafter called "parts") assembled and/or erected by an assembler/installer at a given place to operate together in an expected environment to perform a specific task, but not intended to be placed on the market as a single functional or conventional unit."*

None of our products can perform as a 'single functional or conventional unit'. (i.e. a nipple or fitting cannot perpetuate the flow of water or gas without being attached to other equipment as part of a system) As such, our products would necessarily be considered part of a 'fixed installation', which is accepted as likely being excluded from the scope of both WEEE and the RoHS Directive.

COMPLIANCE

The Edmund A Gray Company does not add, or cause to be added, any of the hazardous substances, as listed in the EU's RoHS Directive (2002/95/EC, as amended by 2005/717/EC and 2005/747/EC) to any of our products.

*The Edmund A Gray Company has inquired with our raw materials suppliers and to the best of our knowledge, based on **their** responses to us, the material(s) being supplied to us do not exceed threshold concentration levels for the hazardous substances listed in the RoHS directives. However, we have no control over their manufacturing processes; Therefore, we cannot be held responsible for changes to their processes which may inadvertently result in changes to concentration levels.*

"IF IT'S A PIPE NIPPLE WE HAVE IT"