



Monday, February 15, 2018

Declaration of Conformity: RED, REACH, RoHS, Heavy Metal, California Prop 65 Compliance and Packaging Compliance

Alien Technology, LLC declares under its sole responsibility that Higgs™ IC's and Higgs™ based RFID inlays and labels are compliant with the following directives of the European Union:

- 2014/53/EU Radio Equipment Directive (**RED**): EN 302 208 V3.1.1, EN 301 489-1 V2.1.1, EN 301 489-3 V2.1.1
- Directive 2002/95/EC (RoHS 1), 2011/65/EU (RoHS 2) and 2015/863 (**RoHS 10**) on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS);
- Under the structure of **REACH** regulations, Alien Technology, LLC is a manufacturer of articles (as defined by the European Chemicals Agency aka ECHA). Alien does not manufacture “substances” or “preparations” and our articles do not involve “intentional release of substances”. Therefore there is no regulation or authorization requirement for Alien products.
- In accordance with article 33 of **REACH**, Alien Technology, LLC declares that any of the SVHC's (Substances of Very High Concern) present in the ECHA candidate list of January 15, 2018 are only present in concentrations $\leq 0.1\%$.
- In accordance with article 67 of **REACH**, Alien Technology, LLC declares that Alien IC's, Inlays and labels confirm to the restrictions of annex XVII.

Additionally:

- Higgs™ IC's and Higgs™ based RFID inlays and labels have all been tested for compliance with **California Prop 65** and for exclusion of heavy metals (Mercury, Cadmium, Chromium, Lead, Arsenic, Manganese, Beryllium, and Nickel) with an Method Detection Limit (MDL) of <100 mg/kg.
- Alien packaging is compliant with Section 4 of **US Toxics in Packaging Clearing House**, Model Legislation and the **European Packaging and Packaging Waste Directive 94/62/EC**.

Based on Alien Technology Corporation (“Alien”) manufacturing methods, supplier test data, declarations and lab testing, Alien assures customers that the products comply with the RoHS directive and REACH regulations as of the date of this letter. Lab tests are available on the Alien Technology website.

The compliant products are identified by model numbers starting with ALC, ALN-9xxx and ALL-9xxx which includes all current Alien IC's, inlays and labels.



We believe this information is accurate and is offered in good faith. This information is subject to revision when additional knowledge/information is gained.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neil Mitchell".

For Alien Technology Corporation
Authorized signatory,
Neil Mitchell
Sr. Director, Marketing