

Vicor Compliance Statement with the EU REACH Regulation

The European Union Regulation [EC 1907/2006](#), entitled “Registration, Evaluation and Authorization of Chemicals” (REACH), entered into effect on June 1, 2007. The new regulation is designed to better safeguard the environment and the health of the human population. Every Chemical Substance produced in or imported in to the EU, and meeting certain additional standards, is required to be Registered with the new European Chemicals Agency (ECHA) in Helsinki, Finland. This Registration process requires extensive safety testing of Chemical Substances. The Regulation is also designed to foster better communication up and down Supply Chain, of Chemical Substance uses, safe handling and Material content.

During the time period from entry into force until June 1, 2008, all EU Chemical Suppliers were required to update their Safety Data Sheets to meet the requirements of REACH Annex II. Vicor Corporation does not manufacture or import any Chemical Substances or Preparations into the EU, and is therefore not required to prepare or update any Safety Data Sheets. Since June 1, 2007, Vicor has received several updated Safety Data Sheets per REACH Annex II from our Supply Base.

During the time period from June 1, 2008 until December 1, 2008, the Regulation requires Pre-Registration of every Chemical Substance produced or imported in to the EU in quantities greater than 1 metric ton per year with ECHA. Pre-Registration is also required for all Preparations – Mixtures, Solutions, Composites – with respect to the individual Substances of which they are comprised. The obligation to Pre-Register the Materials is on each Legal Entity producing or importing such Materials into Europe. As an Article producer, Vicor Corporation has Pre-Registration Obligations for all Substances/Preparations imported into the EU in amounts greater than 1 metric ton **and if** these Substances/Preparations are intended for release from the Articles produced during normal use. Vicor has determined that no Substances/Preparations contained in Articles produced are intended for release during normal use of these Articles, and therefore Vicor Corporation has no Pre-Registration Obligations.

Given the requirements for communication up and down the Supply Chain, Vicor has communicated with all Chemical Suppliers between 04/18/08 and 05/14/08, advising them of their obligations with respect to REACH for Pre-Registration of Chemicals imported in to or produced in the EU in quantities greater than 1 metric ton. All have acknowledged their acceptance of their responsibilities with respect to REACH and their intention to meet these requirements. In addition, communication with all Suppliers between 04/28/08 and 06/17/08 notified all Suppliers of the general requirements of REACH.

In accordance with the Timelines presented in the REACH Regulation for full Registration of all Pre-Registered Substances and Preparations, it is anticipated that all Vicor Chemical Suppliers will fully Register all Chemicals as needed to meet these timelines. As indicated, Vicor will continue to have no Registration Obligations due to having No Intended Release of Substances/Preparations from Articles produced.

The REACH Regulation labels those Substances of particularly severe health hazards as Substances of Very High Concern (SVHC). Per the Regulation, any SVHC found to be present in any Vicor Product, in the amount of 0.1% wt./wt. requires Vicor to immediately notify all Customers of that Product of the presence of the SVHC. The 0.1% wt./wt. value is based on the total weight of the Product delivered, not on homogeneous items within the Product, as per RoHS. In addition, beginning in 2011, any SVHC present in the amount of 0.1% wt./wt. in any Product, and overall, in amounts greater than 1 metric ton per year are required to be communicated to ECHA. The Regulation also requires the release of a "Candidate List of SVHCs" on June 1, 2009, but this list can be released at any time before that. A proposed Candidate List was received by Vicor Corporation from the Association Connecting Electronics Industries (IPC), during July, 2008. Review of this list, and the internal Vicor MSDS Database, indicates one of the Substances listed, Benzyl butyl phthalate, is present within Vicor Corporation. This Material is utilized in VI Chip Production, as part of tooling, and is not present in any final VI Chip/Vicor Product. Review of the SVHC List also indicates another Chemical listed, Diethylhexylphthalate (DEHP), is present in component 32097. This component is a Capacitor used in Vicor Flatpac Assemblies. The weight of DEHP in component 32097 does not approach the 0.1% wt./wt. threshold limit for Flatpac Assemblies that is reportable to Customers; therefore, Vicor continues to be compliant with REACH Requirements. However, in view of the potential for Authorization and Restriction of DEHP, a replacement component for 32097 will be located. As a result of the status of these two Chemicals within Vicor, Vicor will have no SVHC communication requirements with ECHA or any Customer. Vicor will continue to monitor the release of the official Candidate List and all subsequent additions to that list. Upon review, all required communications will be made, if determined to be necessary upon release and review.

In accordance with the above, Vicor Corporation is in full Compliance with the EU REACH Regulation ([EC 1907/2006](#)). Monitoring of the initial official SVHC List and all SVHC Lists promulgated in the future will continue to ensure continued Compliance.