December 9, 2008

To: All Suppliers to International Automotive Components Group North America (IAC)

Subject: New European Union (EU) Regulation on Chemicals (REACH)

As of June 2007, the European Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) entered into force.

REACH affects all industries, including the Automotive Industry (AI). As the AI is made up of vehicle manufacturers and many tiers of the supply chain, it has several roles and obligations under REACH. Action is required from the OEMs and suppliers, some immediately and some over the coming 11 years and beyond.

One of the requirements of REACH is that manufacturers and importers have a duty to register, for each legal entity, substances on their own, or substances in preparations that they produce or import in quantities over one ton per year (per manufacturer/importer), unless the substance is exempt from registration. Registration requirements also apply to substance(s) intentionally released from articles under certain conditions, in which case the article producer/importer is responsible for the registration.

It was of key importance to take advantage of the pre-registration option in REACH. Pre-registration of substances on their own, substances in preparations, or substances intentionally released from articles took place between June 1 and December 1, 2008. Taking advantage of pre-registration allowed for a transitional period to the registration process and allowed continued production and use of substances until 2010 to 2018, depending on annual tonnage. Without pre-registration, substances have to be registered immediately. Without Registration, substances can not be marketed in the EU.

Please note that:

- Companies that do not comply with REACH will have no market. REACH poses a threat to every company doing business in the EU (and businesses with customers who do business in the EU).
- Business continuity can be adversely impacted by REACH and supply chains can be disrupted.
- Companies that understand the business implications and impacts of REACH and develop strategic action plans will gain competitive edge over those that do not.

In order to be prepared for REACH, representatives of all the major vehicle manufacturers and the automotive supply chain around the world developed an “Automotive Industry Guideline on REACH” which can be used to get a quick overview of REACH, its requirements and the recommended actions. This guideline can be found at: www.acea.be/reach.

This “awareness” letter with some recommendations and requests for information is considered to be the start of the communication in the AI supply chain required by REACH.

Please respond to this request of information by December 31, 2008 using the attached Standard Communication along the Supply Chain document.

Regards,

Kelli Carney  
Vice President, Purchasing  
IAC Group North America
REACH: Standard Communication along the Supply Chain

Recommendation and Requests from IAC to Suppliers regarding Pre-registration/Registration

Concerning all products supplied to IAC defined as Substances, Preparations or Articles according to the REACH terminology.

1. At this stage, we expect that all substances, which require registration and are contained in the products you are supplying to us, have been pre-registered by your company or by your upstream supplier.

2. At this stage, we also recommend and expect that all substances, which require registration and are contained in the products you are supplying to us, will be registered.

3. Regarding the substances that are contained in the product and require registration – please take note of the crucial REACH registration deadlines for those substances which are decisive for the product properties.

4. We expect that your business will take organizational measures to manage the implementation of the REACH regulation requirements including appointing an Only Representative in the EU if applicable.

5. If you did not pre-register any substance that is currently in use, please let us know by sending your response to Reach@iacna.com.

6. We expect that you will appoint a single point contact for your company covering all legal entities.

7. Your single point contact details.
   Please provide full contact details for the person in your company responsible for REACH issues. Name, company, telephone & fax number mailing address and email

8. Please send your response, questions or comments on REACH to Reach@iacna.com.

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1 The information contained in this letter expresses only the intention of the requester and does not constitute a legally binding obligation. Whilst the information is provided in utmost good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.

2 See section 5.7 of the Automotive Guideline on “Registrations of substances in articles”
You may have different responses for different “products” supplied to us (which can be Substances, Preparations or Articles according to REACH terminology) and you may need to send a separate sheet for each category of products. Please tick the box(es) for the products covered by this sheet:

<table>
<thead>
<tr>
<th>Substances</th>
<th>Preparations</th>
<th>Articles</th>
</tr>
</thead>
</table>

6. We (the supplier) confirm that we understand our obligations under REACH.
   - Yes [ ]
   - No [ ]

7. If our company is located outside the EU/EEA we will ensure that you, our customer, do not need to act as importer under REACH e.g. by nominating an Only Representative. We answer questions 3-8 on behalf of our importer/Only Representative.
   - Yes [ ]
   - No [ ]

3. The intention is that all substances in the products we supply to you, which require registration, are pre-registered by us or an actor further up our supply chain.
   - Yes [ ] (If yes, go to Q5)
   - No [ ]

4. We will send a list of “products” supplied to you for which there are substances that were not pre-registered.
   - Yes [ ]
   - No [ ]

5. We confirm, or have confirmed with the actors in our supply chain, that the intention is to register for your use(s) the substances that we/they pre-registered.
   - Yes [ ]
   - No [ ]

6. By December 31, 2008, we will send you a list of all “products” that contain substances likely to be included in the candidate list (see guidance and tools in step 6.1 of the AIG compliance schedule and REACH Article 57).
   - Yes [ ]
   - No [ ]
   - None expected [ ]

7. We will send you a list of all “products” that contain substances on the candidate list within 45 days of its publication, or confirmation that there are none (see step 6.3 of the AIG compliance schedule and Article 57).
   - Yes [ ]
   - No [ ]

8. We will have a dialogue with you and our suppliers regarding safe use and risk management measures (RMMs) for the substances and preparations we supply to you.
   - Yes [ ]
   - No [ ]
   - Not applicable [ ]

Further comments (use additional sheets if necessary)………………………………………………………………………………………………………

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