

STATEMENT REGARDING REACH CONFIRMITY

DATE: August, 2011

REACH AT SWAROVSKI

This letter is intended to address questions our customers might have about REACH at Swarovski. The Swarovski REACH Team developed the present statement based on past inquiries and we hope it will help our customers to determine whether or not REACH affects their relationship with Swarovski.

General Information on REACH

EU regulation 1907/2006/EC, **REACH** - the **R**egistration, **E**valuation and **A**uthorisation of **C**hemicals - came into force on June 1, 2007. Under this regulation, manufacturers or importers of chemicals must pass on information about chemicals contained in the products they provide. This information needs to be provided both to customers and to the **E**uropean **C**hemicals **A**gency (**ECHA**). REACH therefore regulates procedures for enterprises handling chemicals. It does not establish specifications for the chemical composition of products. Swarovski is aware of the several steps that need to be undertaken to comply with this regulation and will act accordingly.

Art.33 notification for substances in articles

Art.33 of REACH regulates that if an article contains substances of very high concern (SVHC), the supplier of the article in question must provide the recipient with sufficient information to allow it to be safely used and to specify the SVHC contained in the article.

The list of SVHC substances is published on the web page of the ECHA under the link http://www.echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

As of August 1, 2011 Swarovski has not been made aware by any of its suppliers that any component of a Swarovski article contains any SVHC above 0.1%. To the best of our knowledge all our articles are free from SVHC above 0,1%.

REACH PROCESS

We would like to inform you that the identification of substances as SVHC is a three-step process:

1. A EU-Member-State prepares a document detailing the reasons why it believes that a dangerous substance is of "very high concern". This work is usually not done in public but only on initiative of the competent authority of a member state.
2. In a second step ECHA collects these documents and publishes them on its website as a "consultation" (see http://www.echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp). This has recently happened to another 8 substances in question. At the end of the consultation a consensus is reached and this will be to either include a particular substance on the SVHC list, or not to include it.
3. As a third step ECHA publishes on its webpage the current SVHC-list (the "Candidate List for Authorisation", see http://www.echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp). This list, since 20.06.2011, contains 53 substances.

Swarovski re-evaluates its SVHC statement with every expansion of this list. Should we become aware of new facts that change the content of this statement we will inform all customers who are affected through our own initiative.

ADDITIONAL INFORMATIONS

Should a substance that is contained in Swarovski articles be put on the SVHC list, Swarovski will, through its own initiative, issue art.33 notifications to all its direct recipients of articles affected.

Annex XVII

Swarovski products, whether articles or mixtures, are in full compliance with the **restrictions on the manufacture, placing on the market and use of the substances, preparations and articles** as set out in annex XVII of REACH. As with the candidate list (SVHC-list), Swarovski continually monitors annex XVII and will respect any future restriction specified in this annex.

What is Swarovski doing to be prepared for REACH

In order to ensure that Swarovski is well prepared for REACH, the implementation work was already started early in 2006.

Our team of experts is monitoring REACH closely and implements all necessary measures to ensure a smooth transition into the REACH era, thus avoiding any unnecessary disruption in the marketing and supply of Swarovski articles.

Has Swarovski registered the substances in my product?

Swarovski has pre-registered, where necessary, all substances manufactured in or imported into the European Union.

No registration is necessary for articles imported by Swarovski into the EU and as a consequence, (pre)registration has not been performed.

For chemicals and articles sourced in the EU, Swarovski is a downstream user. As such we have sought communication with our suppliers to ensure that key raw materials will be supported and that our manufacturing processes will not be affected. We can, however, not guarantee that our suppliers register all their products and take our uses into account. Should problems in our supply chain arise, Swarovski will work hard with its suppliers to solve them, as this is in the mutual interest of all parties involved.

What should I do as downstream user of Swarovski articles?

The risk assessment of uses of a chemical plays a central role in the REACH concept and will require the exchange of information between supplier and downstream user.

Swarovski generally has a very good knowledge and understanding of how its articles are used by their downstream users, if these articles are used according to how they were developed to be.

To avoid double work for customers, Swarovski will, if necessary, request all information needed from its downstream users in good time.

Generally, no immediate action by you is required at the moment.

In case you use our articles in a way that is contrary to that for which they have specifically been developed, or in a way that you suspect we have no knowledge of, you may wish to let us know through communication up the supply chain.

Please find more information on WWW.SWAROVSKI-ELEMENTS.COM/BUSINESS and in our Application Manual.

Failure to follow Swarovski's care instructions may result in damage to the crystal, which could pose a risk of laceration or other harm. Any oral, written or test-based advice that Swarovski provides regarding techniques for application of its products are recommendations based on Swarovski's current knowledge and the information provided by its suppliers. Such advice does not discharge customer from carrying out its own tests of techniques it proposes to use and their suitability for the intended application. The application, use and processing of these techniques and products are solely user's responsibility.