



January 1, 2006

Ashly Audio, Inc. manufactures a wide range of products; a large number of subassemblies and components are purchased from other manufacturers. Ashly Audio goes to great lengths to make sure all our products meet applicable legal requirements when they ship, and we continually monitor changes in those requirements. We have surveyed our products, and to the best of our knowledge, Ashly Audio is in compliance with all applicable national and international laws and regulations, including those that may restrict the materials content of certain products. Ashly Audio assumes no liability for changing regulatory requirements after a product ships.

Ashly Audio also has a comprehensive management program in place to ensure our products conform to the **European Union's Restriction of Hazardous Substances (RoHS)**. Ashly Audio's RoHS compliance approach includes the following elements and requirements:

1. For products designated by Ashly Audio to be RoHS compliant, Ashly Audio specifies and designs the product to use materials and parts that conform to the RoHS directive. Ashly Audio manages the information associated with the supplier materials/parts within a database.
2. All Ashly Audio suppliers of RoHS compliant products must provide Ashly Audio a declaration that the particular products supplied meet the RoHS directive.
3. Ashly Audio follows a detailed product qualification process for all products.

Ashly Audio's approach to demonstrate RoHS compliance is consistent with the approach put forward by Industry to the European Union Technical Advisory Committee (EU TAC) [http://europa.eu.int/eur-lex/pri/en/oj/dat/2003/l\\_037/l\\_03720030213en00190023.pdf](http://europa.eu.int/eur-lex/pri/en/oj/dat/2003/l_037/l_03720030213en00190023.pdf) and is also consistent with guidance provided by the United Kingdom Department of Trade and Industry (UK DTI) in their guidance notes on implementing RoHS. The guidance from the UK DTI may be found at [http://www.dti.gov.uk/sustainability/weee/RoHS\\_Regs\\_Draft\\_Guidance.pdf](http://www.dti.gov.uk/sustainability/weee/RoHS_Regs_Draft_Guidance.pdf)

Ashly Audio defines RoHS compliance with the EU RoHS directive as lead and other restricted materials are either (1) below all applicable substance thresholds as proposed by the EU or (2) an approved/applicable exemption applies. Our products will comply with the directive in force at the time shipped.

### **Position on Homogeneous Material Reporting**

Ashly Audio does not require having our outsource manufacturers and suppliers provide analytical test data at the homogeneous material level. This would create an unnecessary and costly burden on the supply chain and also create a burden to collect and maintain that data. There are no requirements to report such data to demonstrate compliance to RoHS. In contrast, the Ashly Audio RoHS compliance system outlined above ensures all environmental requirements are met by suppliers and the appropriate RoHS information is communicated to Ashly Audio with internal checks and balances to ensure compliance. This approach also eliminates the need for burdensome data management requirements and allows Ashly Audio to declare applicable products compliant based on an effective management system. If you have any questions concerning this letter, please contact me.

Sincerely,

Jon Paul Boucher  
VP, Operations  
Ashly Audio, Inc.