ITW REACH Statement

March 12, 2020

Valued Customers,

Illinois Tool Works Inc. (ITW) began preparing for the requirements of the European Union (EU) Regulation on the Registration, Evaluation, Authorization and Restriction of Chemical substances (REACH) years ahead of the first REACH deadline. ITW consulted with outside legal and technical experts regarding REACH compliance. Within the organization, various communication channels were utilized to raise REACH awareness.

The ITW Corporate Environmental, Health, Safety and Sustainability Group (ITW EHSS) works directly with ITW divisions in the United States to amalgamate direct EU export information for affected chemical substances. ITW EHSS works indirectly with the separate legal entities of ITW both within and outside the EU in regard to REACH. Separate legal entities within ITW have their own REACH compliance programs and may be contacted directly regarding REACH.

The history and current status of the REACH compliance program for ITW divisions are as follows:

Initial chemical substance totals from our divisional business units were collected and compiled. These substance totals were updated on a semiannual basis. We appointed a division of ITW Ireland as our Only Representative (OR) to complete REACH pre-registration and subsequent registration requirements. Our OR completed the pre-registration of all affected substances (those that exceeded the registration threshold of 1 metric ton per year and were not otherwise exempted) using the REACH-IT portal on the European Chemicals Agency (ECHA) web site.

Registration has now been completed for all affected substances per the relevant REACH registration deadlines. Supplier OR coverage of registration obligations is utilized for certain substances. We will continue to evaluate our substance totals going forward and register additional affected substances as necessary. We address other REACH requirements such as those pertaining to Substances of Very High Concern (SVHC) and supply chain communication on an ongoing basis. Classification, Labelling and Packaging (CLP) regulation requirements regarding initial C+L notification were completed in December 2010 for applicable substances.

Please contact Ken Brown of ITW EHSS for questions or discussion regarding REACH. If your inquiry pertains to a legal entity other than ITW itself, you will be directed to a REACH contact within that separate legal entity.

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