

July 3, 2006

RoHS Certificate of Compliance

We, Panasonic (Matsushita Battery Industrial Co., Ltd.), hereby declare that our products indicated below are currently in compliance with EU Directive 2002/95/EC, with respect to the following 6 substances:

- 1) Lead (Pb)
- 2) Cadmium (Cd)
- 3) Mercury (Hg)
- 4) Hexavalent chromium (Cr(VI))
- 5) Polybrominated biphenyls (PBB)
- 6) Polybrominated diphenyl ethers (PBDE)

RoHS Compliance by Product Type:

BR Series – Poly-carbonmonofluoride Lithium Batteries
BR”A” Series – Extended Temperature Range Coin Cells
CR Series – Manganese Dioxide Lithium Batteries
VL Series – Vanadium Rechargeable Lithium Batteries
ML Series – Manganese Rechargeable Lithium Batteries
ML-R Series – Reflow Solderable ML Lithium Batteries
NBL Batteries – Niobium Rechargeable Lithium Batteries
MT Series – Titanium Lithium Batteries
CGR & CGA Series – Lithium Ion Rechargeable Cells (Li-Ion)
HHR & HHF Series – Nickel Metal Hydride Rechargeable Cells (NiMH)
AM, LR & ZR Series – Alkaline & Oxyride Batteries

Note: All Panasonic Lithium coin & cylindrical cells included with **welded tabs/terminals** produced by Panasonic after **March 31, 2003** use lead-free solder tinning. The tab material is Ni plated Sn. The lead free solder tinning on the tabs is Sn-3.0Ag-0.5Cu.

Exceptions

LC-R, LC-P, & UP-RW - Valve Regulated Lead Acid Batteries (VRLA)
P Series - Nickel Cadmium Cells (NiCd)
UM Series, R1NW & 6F22NW - Carbon Zinc Batteries

Valve Regulated Lead Acid batteries, Nickel Cadmium batteries and Carbon Zinc batteries have lead or cadmium levels exceeding the agreed levels under the requirements of the ROHS Directive. They can, however, continue to be sold in the EU as long as they are sold in compliance with the Battery Directive.

Considerations

Batteries are specifically not covered by the RoHS Directive. Refer to page 2 of this document for an overview.

RoHS, Batteries and The Battery Directive

Batteries are specifically not covered by the RoHS Directive. The Technical Adaptation Committee (TAC) under the WEEE and RoHS Directives concluded in their December 17, 2003 meeting that batteries were not covered by either Directive.

Please refer to the EU Commission WEEE FAQ section 1.5 for reference.

http://www.europa.eu.int/comm/environment/waste/pdf/faq_weee.pdf

Relationship between the ROHS and WEEE Directives and the Battery Directive

In August 2004 the European Portable Battery Association (EPBA) published a legal opinion intended to clarify the relationship between the ROHS and WEEE Directives and the batteries used in appliances.

General Conclusions:

- The marketing restriction, as provided for in the RoHS Directive, on new equipment containing mercury, lead and cadmium does not apply to batteries used with or incorporated in electrical and electronic equipment.
- The WEEE Directive applies to spent batteries collected together with WEEE and requires their removal and separate collection. Once removed from WEEE, spent batteries are governed by the Battery Directive. Therefore, batteries containing lead or cadmium, as well as button cells with a mercury content of no more than 2% by weight can be used in electrical and electronic equipment after 1 July 2006. This applies to individual cells, battery packs or batteries attached to the equipment (i.e. soldered to parts of the equipment).

While batteries and battery packs are exempt from the requirements of the RoHS Directive, we have voluntarily committed to eliminate the use of these RoHS substances from our products, except our Nickel Cadmium and Lead Acid batteries, where this is impossible because cadmium and lead are the primary metal in the electrodes.