



Tecumseh

Date: August 27, 2019
To: Our Valued Customers and Partners
Subject: Regulatory Compliance Disclosure

Tecumseh Products Company LLC is dedicated to complying with many product-based regulations that may impact the environment or people's health. Our assessment for compliance relies upon on the quality and accuracy of response from our supply base through a third-party assessor and internal assessments. As such we are working with our vendors to provide our customers with the necessary information to ensure safety and regulatory compliance.

European Union Regulation No. 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)

In accordance with the regulations, we are considered producers of articles. Based on the list of substances of very high concern (SVHC) (<https://oehha.ca.gov/proposition-65/proposition-65-list>), as of August 27, 2019, we have found that our supply base has products sold with SVHC that are over the designated threshold level. We are currently developing a template for customers that show this complete list of parts and the relationship to our finished good items. This is expected to be completed in Q4 2019.

European Union Directive 2011/65/EU, as amended in Directive 2017/2102 and 2015/863, Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS 2&3)

Our internal assessment to Directive 2011/65/EU, as amended in Directive 2017/2102 and 2015/863 has determined that, as of August 27, 2019, the components produced and/or marketed by Tecumseh Products Company LLC either:

- 1) do not contain materials, above the applicable threshold levels, OR
- 2) do contain materials above the applicable threshold but are allowable by exemption.

For more information on this directive, see http://ec.europa.eu/environment/waste/rohs_eee/index_en.htm.

California Prop 65

On 30 August 2018, new warnings and labeling requirements under California's Safe Drinking Water and Toxic Enforcement Act of 1986, better known as Proposition 65 ("Prop 65"), will go into effect. Products manufactured by Tecumseh Products Company LLC contain some or trace amounts of lead (less than RoHS2&3 requirements), a compound known to the State of California to cause cancer, and birth defects or other reproductive harm. Consequently, in accordance with Prop 65, finished products manufactured from these components and introduced into the stream of commerce in the State of California, must contain a warning label.

All labels on product packaging, pack slips, installation instructions, and guidelines for Tecumseh Products Company LLC are in effect since August 20, 2018.

For more information or questions regarding Prop 65 compliance, please visit the website above or <https://oehha.ca.gov/proposition-65/about-proposition-65>.



Tecumseh

Dodd-Frank Wall Street Reform Act: Conflict Minerals Rule

Tecumseh Products Company LLC's Conflict Minerals program is modeled to conform to OECD. Due Diligence Guidance - <http://www.oecd.org/corporate/mne/GuidanceEdition2.pdf>. As such, Tecumseh Products Company LLC aims to progressively eliminate the adverse impacts of potential risks to its supply chain within reasonable timescales. Tecumseh Products Company LLC conducts risk mitigation and due diligence appropriate to the nature of the risk and the individual circumstances of the product, supplier, or services involved.

During the process of surveying its suppliers, most of the declarations received by Tecumseh Products Company LLC have provided smelter information at a company or division level — as per industry standard - or were unable to specify the smelters used for products supplied to Tecumseh Products Company LLC. Currently, we are unable to verify that the list of reported smelters accurately represents the supply chain for parts provided to or from Tecumseh Products Company LLC.

Tecumseh Products Company LLC is in a continual process of surveying the supply chain and will continue to receive responses and identify smelters of concern. Requests for updated CMRTs from Tecumseh Products Company LLC will be fulfilled as new information becomes available through Tecumseh Products Company LLC's due diligence efforts.