



Corporate Office – 3475 Symmes Rd  
Hamilton, OH 45015 USA

29 April 2026

**Subject:** Product Compliance Statements - Applicable to all United Performance Metals locations and affiliates

### **RoHS2 & RoHS3**

Regarding the European Union Directive 2011/65/EU (RoHS2) and European Directive 2015/863 (RoHS3) on the restriction of the use of certain hazardous substances in electrical and electronic equipment:

Uncoated products supplied by United Performance Metals do not contain lead (Pb), mercury (Hg), cadmium (Cd), hexavalent chromium (Cr<sup>6+</sup>), polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP), or diisobutyl phthalate (DIBP) in concentrations exceeding the maximum concentration values permitted in homogeneous materials, namely 0.01% by weight for cadmium and 0.1% by weight for all other restricted substances.

The content of these substances in our uncoated metallic products is considered negligible. Any chromium present in United Performance Metals alloy grades is present exclusively in metallic (zero-valent) form and not in the hexavalent chromium (Cr<sup>6+</sup>) form restricted under RoHS.

Accordingly, uncoated metallic products supplied by United Performance Metals are compliant with Directive 2011/65/EU (RoHS), as amended, including Directive (EU) 2015/863.



## REACH

With respect to the application of European Union Regulation (EC) No 1907/2006 (REACH), including its consolidated amendments and Annex XVII, and our commitment to comply with all applicable requirements, United Performance Metals provides the following assurances:

All uncoated metallic mill products supplied by United Performance Metals (including, but not limited to, plate, coil, sheet, strip, bar, tube, pipe, and ingots) are considered articles within the meaning of Article 3(3) of the REACH Regulation.

These articles do not contain substances intended to be released under normal or reasonably foreseeable conditions of use, as described in the European Chemicals Agency (ECHA) Guidance on requirements for substances in articles. Accordingly, no registration obligation under Article 7(1) of REACH applies to these articles.

Under REACH, registration obligations for substances apply only to EU manufacturers or importers of substances or articles where the relevant legal criteria are met. In certain circumstances, customers incorporating materials supplied by United Performance Metals into their own finished products may assume REACH obligations specific to their role in the supply chain. In such cases, material or safety data information associated with the applicable alloy grade may be required to support the customer's compliance activities.

Uncoated metallic products supplied by United Performance Metals do not contain Substances of Very High Concern (SVHCs) in concentrations equal to or exceeding 0.1% by weight (w/w) in any homogeneous material, as defined under Article 57 and Article 59 of REACH, based on the current ECHA Candidate List of SVHCs. United Performance Metals continuously monitors updates to the Candidate List and will take appropriate action should regulatory status or substance listings change.

More information regarding REACH, Annex XVII restrictions, and Substances of Very High Concern is available from the European Chemicals Agency (ECHA): <https://echa.europa.eu>



## **ELV Directive**

Regarding European Union Directive 2000/53/EC on end-of-life vehicles (ELV), as amended and currently in force:

The content of lead, mercury, cadmium, and hexavalent chromium in uncoated metallic products supplied by United Performance Metals does not exceed the maximum concentration values permitted in homogeneous materials under the Directive, namely 0.01% by weight for cadmium and 0.1% by weight for the other listed substances, except where specific exemptions apply. The presence of these restricted substances in our uncoated metallic products is negligible. Any chromium present in stainless and other alloy grades supplied by United Performance Metals is present exclusively in metallic (zero-valent) form and not in the hexavalent chromium form restricted by the ELV Directive.

## **POPs Regulation – ECHA**

Products supplied by United Performance Metals do not contain Persistent Organic Pollutants as regulated under Regulation (EU) 2019/1021 on persistent organic pollutants, as amended and consolidated through 2025. This statement is based on a review of substances listed in Annex I (prohibitions), Annex III (unintentional release reduction), and Annex IV (waste management provisions) of Regulation (EU) 2019/1021, using the current European Chemicals Agency (ECHA) List of Substances Subject to the POPs Regulation. The products supplied do not intentionally contain, nor are they expected to contain as unintentional trace contaminants above applicable limits, any substances listed under the above annexes for their intended industrial use.

## **BPR**

Products supplied by United Performance Metals do not contain biocidal products, biocidal active substances, or treated articles with an intended biocidal function, as defined under Regulation (EU) No 528/2012.

## **WEEE II**

The European Union Waste Electrical and Electronic Equipment (WEEE) Directive 2012/19/EU, does not apply to uncoated metallic mill products supplied by United Performance Metals or to products produced by the mills used by United Performance Metals as supply resources.



## **AD-DSL**

Uncoated products supplied by United Performance Metals do not contain any significant amounts of the chemical compounds on the May 2021 IAEG® Aerospace and Defense Declarable Substances List (AD-DSL) and the maximum concentration for such substances in homogenous materials does not exceed 0.1% by weight. We will continue to monitor the AD-DSL as it is updated.

## **PBT**

Products supplied by United Performance Metals do not contain any of the persistent, bioaccumulative, and toxic (PBT) chemical substances identified by the U.S. Environmental Protection Agency (EPA) in the final PBT rules issued under Section 6(h) of the Toxic Substances Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act, and as subsequently implemented and enforced by EPA.

The five PBT substances addressed by these rules—DecaBDE, PIP (3:1), 2,4,6-TTBP, HCBP, and PCTP—are not intentionally added to products supplied by United Performance Metals, nor are they expected to be present in our uncoated metallic products.

## **California Prop 65**

Safety Data Sheets (SDSs) containing information relevant to California Proposition 65, including chemicals listed by the California Office of Environmental Health Hazard Assessment (OEHHA) where applicable, are available upon request by contacting United Performance Metals Compliance at:

[www.upmet.com/resources/quality-approvals#environmental-health--safety](http://www.upmet.com/resources/quality-approvals#environmental-health--safety)



## PFAS

United Performance Metals (UPM) is a distributor of mill-produced metallic products. UPM does not chemically or mechanically modify the composition of materials purchased from our supplying mills or those maintained in our inventory. Material processing performed by UPM is limited to dimensional modification, including cut-to-length, slitting, shearing, saw cutting, laser cutting, and waterjet cutting.

No perfluoroalkyl and polyfluoroalkyl substances are intentionally added, introduced, or applied to materials during these processing activities or during storage and handling at UPM facilities.

UPM monitors product compliance with applicable and emerging PFAS regulatory requirements through:

- Compliance certifications and declarations provided by our supplying mills
- Review and maintenance of applicable Safety Data Sheets (SDS/MSDS) for supplied products

Should UPM become aware that any supplied material does not comply with applicable PFAS regulatory requirements, customers will be notified accordingly.

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