



QUALITY SOLUTIONS. TRUSTED PARTNERS WWW.UPMET.COM

Corporate Office – 3475 Symmes Rd
Hamilton, OH 45012 USA

February 16, 2023

Subject: Product Compliance Statements –

Applicability: Applicable to all United Performance Metals locations and affiliates

RoHS2 and RoHS3

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

The content of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) or Diisobutyl phthalate (DIBP) in uncoated products supplied by United Performance Metals do not exceed the maximum concentration values for such substances in homogenous materials of up to 0.01% by weight for cadmium and 0.1% for the other substances.

The content of these substances in our uncoated metallic products is negligible. The Chromium content contained in our alloy grades is METALLIC form (zero-valent).

Uncoated metallic products supplied by United Performance Metals are compliant with the European Union Directives 2011/65/EU (RoHS2) & 2015/863/EU (RoHS3).



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REACH

With respect to the application of European Union Regulation (EC) No 1907/2006 (REACH) and Annex XVII to our uncoated metallic products and our intention to comply with the requirements, we can assure you that:

All uncoated metallic mill products supplied by United Performance Metals (e.g., plate, coil, sheet, strip, bar, tubes, pipe, ingots etc.) are articles under REACH.

These articles have no intended release, as outlined in the European Chemical Agency's "Guidance on requirements for substances in articles" (RIP 3.8), and, therefore, we have no registration obligation under REACH for the articles. Registration of products can only be accomplished by the European manufacturer or by the organization importing the item into the EU, provided it meets the registration criteria. In some instances, customers producing products using materials supplied by United Performance Metals may need to submit a REACH registration for THEIR end product. In such a case, the Safety Data Sheet (SDS) pertaining to the applicable alloy grade may be needed to facilitate the registration process.

Uncoated metallic products supplied by United Performance Metals do not contain any significant amounts of the chemical compounds on the January 2023 EU Candidate List of 233 Substances of Very High Concern (SVHC) and the maximum concentration for such substances in homogenous materials does not exceed 0.1% by weight. UPM will continue to monitor the candidate list as it is updated.

More information on Substances of Very High Concern can be found at the European Chemicals Agency's website, <https://echa.europa.eu>



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ELV Directive

Regarding the European Union Directive 2000/53/EC on end-of life vehicles:

The content of lead, mercury, cadmium, and hexavalent chromium in uncoated metallic products supplied by UNITED PERFORMANCE METALS do not exceed the maximum concentration values for such substances in homogenous materials of up to 0.01% by weight for cadmium and 0.1% for the other substances. The content of these substances in our uncoated metallic products is negligible. The Chromium in our stainless is METALLIC form (zero-valent). Uncoated metallic products supplied by UNITED PERFORMANCE METALS are compliant with the European Union Directive 2000/53/EC.

POPs Regulation – ECHA

Products supplied by UNITED PERFORMANCE METALS do not contain Persistent organic pollutants (POPs) as defined by ECHA List of substances subject to POPs Regulations Annex I,III,& IV on 9/24/2021. More information of substances subject to POPs regulations can be found at <https://www.echa.europa.eu/list-of-substances-subject-to-pops-regulation>

BPR

Products supplied by UNITED PERFORMANCE METALS do not contain Biocides as defined by EU Biocidal Products Regulation (BPR), Regulation (EU) 528/2012.



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WEEE II

EU Waste Electrical and Electronic Equipment (WEEE II) Directive (2012/19/EU) is not applicable to products produced by the mills used by UNITED PERFORMANCE METALS for 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 five (5) persistent, bioaccumulative and toxic (PBT) chemicals identified in the January 6, 2021 final rules issued by EPA in accordance with the Toxic Substances Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act.

CALIFORNIA PROP 65

Safety Data Sheets that provide information regarding California Prop 65 , where applicable, are available when requested from compliance@upmet.com

If you have any additional questions, please contact our Compliance Department, by email (compliance@upmet.com).

Josh Fields

Josh Fields
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