



European Union REACH Initiative

Effective June 2007, the European Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) entered into force.

On June 1, 2008, the European Chemicals Agency (ECHA) began its pre-registration of chemical substances that are placed on the EU market, either on their own in preparations, or in articles.

Purpose of this letter: United Performance Metals provides this discussion to customers and downstream users regarding our intentions under the new REACH legislation.

What is the objective of REACH? The objective of REACH is to improve the protection of human health and the environment. An estimated 30,000 chemical substances in use today will be registered over a period of 11 years.

What does United Performance Metals supply to the EU? As you are aware United Performance Metals is a leading supplier of specialty stainless steel and high temperature alloys typically in the form of sheets, coils or plates. We also provide certain formulated products to our customers. United Performance Metals provides SDS and technical data sheets for each of its products.

Where Does United Performance Metals fit in? This is a complicated law and requires cooperation throughout the supply chain to avoid disruption in the supply chain and ensure uninterrupted access to the European market. United Performance Metals is a supplier of articles and preparations into the European Union as typically consumed by our customers. As a US supplier United Performance Metals is not regulated under REACH. As such we do not plan, at this time, to (pre) register any of the substance contained in our articles or formulated products. We do want to cooperate and assist our customers in the execution of their REACH implementation strategies.

What is the definition of an Article? Within the scope of REACH an Article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition. Article 3(3) indicates that an article is composed of one or more substances or preparations and it may contain one or more materials. The material may be of natural origin, such as wood or wool, or they may be processed such as polyvinyl chloride (PVC) or steel. We are not aware of circumstances in which our metals are further chemically processed. Further it is

our understanding that processing of our metals is limited to 'light processing'. However, if a customer consumes our products in such a way that they would be considered a preparation we will continue to fully cooperate in providing information on the composition of the alloys.

Do Customers need to pre-register and register substances in articles purchased from United Performance Metals under REACH? Not in our opinion. United Performance Metals only Imports into the EU articles of specialty stainless steel and high temperature alloys, which do not contain any substances that are intended to be released under normal and foreseeable conditions of use.

Do Customers need to pre-register and register substances in formulated products purchased from United Performance Metals under REACH. This is dependent on the volume of material imported and other considerations. We do not plan to (pre) register substances contained in these products under the REACH regulation. However, we will cooperate with our customers as they implement their REACH strategies. United Performance Metals provides SOS and other information, which can be used by our customers to evaluate their obligations in this area.

Do Customers need to notify substances in articles purchased from United Performance Metals under REACH?

At this time certain articles provided by United Performance Metals are made of alloys containing substances that may meet the criteria of Article 57 and are present in our alloys at concentrations greater than 0.1% weight by weight. The constituents and their concentrations of our alloys are identified on our SOS and technical data sheets. Customers are encouraged to monitor the publication of the candidate list of substances of very high concern and take applicable action.

How will United Performance Metal communicate to our consumers?

Upon request, United Performance Metal will continue to provide SDS and technical data sheets containing information on the constituents of our products.

Please note the comments above reflect our opinion relative to the products provided by United Performance Metals. Customers are advised to seek counsel relative to their specific application and use of these products.

Questions? Questions concerning REACH and United Performance Metals may be directed to:

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