



ATI Specialty Alloys & Components

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July 8, 2020

Subject: Product Compliance Statement

Products supplied by ATI Specialty Alloys & Components (SAC) are compliant with the European Union Directives 2011/65/EU (**RoHS2**) and 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, asbestos, natural rubber latex, polybrominated biphenyls (PBB), or polybrominated diphenyl ethers (PBDE), Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP), Diisobutyl phthalate (DIBP) in products supplied by ATI SAC does 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 chromium present in some of our products is metallic form (zero-valent).

With respect to the application of **European Union Regulation (EC) 1907/2006 (REACH)** to our products, and our intention to comply with the requirements:

- Products supplied by ATI SAC do not contain any significant amounts of the chemical compounds found in the **EU Candidate List of Substances of Very High Concern (SVHC) as of July 8, 2020** and the maximum concentration for such substances in homogenous materials does not exceed 0.1% by weight. We 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 Chemical Agency's website, echa.europa.eu.
- Concerning REACH Annex XVII, products produced by ATI SAC do not contain any of the substances listed above the applicable threshold, except nickel, which if present is listed on the corresponding Safety Data Sheet.
- Many of ATI SAC products 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, have no registration obligation under REACH.
- We have appointed an Only Representative under REACH.
- We have registered the following substances under REACH that are contained within products supplied by ATI Specialty Alloys & Components:
 - Zirconium: 01-2119490102-49-0002
 - Nickel: 01-2119438727-29-0100
 - Titanium: 01-2119484878-14-0033

Products produced by ATI Specialty Alloys & Components do not contain any of the substances above any applicable thresholds of the following inventories, lists, or regulatory standards:

- Japanese Chemical Substances Control Law (Class I Specified Chemical Substances)

- Industrial Safety and Health Act (Substances Prohibited of Manufacturing etc.)
- CLP (Annex VI Table 3.2 CMR-cat. 1.2)
- POPs Annex x I
- ESIS (PBT list, now part of ECHA)
- IEC62474/JIG

Concerning the Poisonous and Deleterious Substances Control Law (Specified Poisonous Substances):

- Products produced by ATI SAC do not contain any of the substances listed above the applicable threshold, except barium, which if present is listed on the corresponding Safety Data Sheet.

Concerning the Global Automotive Declarable Substance List (GADSL):

- Products produced by ATI SAC do not contain any of the substances listed above the applicable threshold, except barium, nickel, copper, and cobalt, which if present are listed on the corresponding Safety Data Sheet.

Concerning the End-of Life Vehicles (ELV) Directive:

- Products produced by ATI SAC are not found to contain lead, mercury, cadmium or hexavalent chromium. Because all of our products contain naturally-occurring ingredients, trace amounts of certain metal elements could theoretically be present in any of our products without our knowledge.



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