

1300 Pacific Ave  
Natrona Heights, PA 15065 USA  
July 30, 2021

**Subject:** Product Compliance Statements

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 ATI Flat Rolled Products 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 products is negligible. The Chromium in our stainless is METALLIC form (zero-valent).
- Uncoated products supplied by ATI Flat Rolled Products are compliant with the European Union Directives 2011/65/EU (RoHS2) & 2015/863/EU (RoHS3).

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

- The content of lead, mercury, cadmium, and hexavalent chromium in uncoated products supplied by ATI Flat Rolled Products 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 products is negligible. The Chromium in our stainless is METALLIC form (zero-valent).
- Uncoated products supplied by ATI Flat Rolled Products are compliant with the European Union Directive 2000/53/EC.

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

- All uncoated products supplied by ATI Flat Rolled Products (e.g., plate, sheet, strip, and Precision Rolled Strip®) 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.
- Uncoated products supplied by ATI Flat Rolled Products do not contain any significant amounts of the chemical compounds on the **July 2021 EU Candidate List of 219 Substances of Very High Concern (SVHC)** 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.

- Uncoated products supplied by ATI Flat Rolled Products are not subject to the REACH Restrictions listed on Annex XVII database of 69 entries, last updated March 23, 2021. We will continue to monitor the Annex XVII database as it is updated.

Additional Compliance and/or Applicability Statements:

- ATI Flat Rolled Products do not contain Persistent organic pollutants (POPs) as defined by ECHA List of substances subject to POPs Regulations Annex I,III,& IV on 3/25/2020. More information of substances subject to POPs regulations can be found at <https://www.echa.europa.eu/list-of-substances-subject-to-pops-regulation>
- ATI Flat Rolled Products do not contain Biocides as defined by EU Biocidal Products Regulation (BPR), Regulation (EU) 528/2012.
- EU Waste Electrical and Electronic Equipment (WEEE 2) Directive (2012/19/EU) is not applicable to products produced by ATI Flat Rolled Products.
- Uncoated products supplied by ATI Flat Rolled Products do not contain any significant amounts of the chemical compounds on the March 2020 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.
- Safety Data Sheets and California Prop 65 Labels, where applicable, are available at the following website <https://www.atimetals.com/safety-data-sheets>

If you have any additional questions, please contact our RoHS and REACH representative Kevin Hineman by email [Kevin.Hineman@ATIMetals.com](mailto:Kevin.Hineman@ATIMetals.com)