



ULBRICH STAINLESS STEELS & SPECIAL METALS, INC.

March 10, 2022

Subject: EU REACH Regulation (EC 1907/2006)

The uncoated strip stainless steel, nickel alloys, titanium, niobium and zirconium manufactured at Ulbrich Specialty Strip Mill (USSM) are in the form of coils, which are classified as “finished” products in accordance with the REACH guidance documentation. These products are classified as “articles” which do not contain “substances” intended for release. In accordance with the REACH regulations, products classified as “articles” are not required to register their constituent “substances”. In particular, Article 3 of REACH defines an “article” as: “An object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition”. Therefore, it is Ulbrich’s opinion that there are no registration requirements for the uncoated metal under REACH.

In addition, these materials do not contain any of the Substances of Very High Concern published on January 17, 2022 in amounts at or exceeding the regulated concentrations. This list of substances triggers notification requirements for articles if certain criteria are met, primarily the substance being present in the article at a concentration greater than 0.1%. Based on certifications from our suppliers, we believe that none of these chemicals are present in the uncoated metal produced at our mill in concentrations equal to or greater than 0.1% of the total product weight.

If you purchase coated/plated materials or purchase materials from a different Ulbrich site, please contact your Ulbrich sales representative for information on those products.

Sincerely,

Debra DeFelice

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