

February 24, 2020

Subject: The European Union restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS Directives).

Uncoated stainless steel, titanium, zirconium and niobium from Ulbrich Specialty Strip Mill and Ulbrich of Illinois complies with Directives 2002/95/EC, 2011/65/EU (RoHS2), 2015/863 and the January 2017 scope change (RoHS3). This includes the materials prohibitions that went into effect on July 22, 2019.

We certify that the following listed substances are not present in quantities exceeding the stated maximum concentration levels. The content of RoHS hazardous substances (see list below) is at or near zero. The chromium in our stainless steel is metallic which is zero-valent.

RoHS Hazardous Substance List:

Compliance Definition: RoHS Restricted Substances in Parts and Materials	
Substance Category	Threshold Level
Cadmium/Cadmium Compounds	100 ppm per homogeneous materials
Mercury /Mercury Compounds	100 ppm per homogeneous materials
Hexavalent Chromium	1000 ppm per homogeneous materials
Lead/Lead Compounds	1000 ppm per homogeneous materials
Polybrominated Biphenyls (PBB)	1000 ppm per homogeneous materials
Polybrominated Diphenyl Ethers (PBDE)	1000 ppm per homogeneous materials
Bis(2-Ethylhexyl) phthalate (DEHP)	1000 ppm per homogeneous materials
Benzyl butyl phthalate (BBP)	1000 ppm per homogeneous materials
Dibutyl phthalate (DBP)	1000 ppm per homogeneous materials
Diisobutyl phthalate (DIBP)	1000 ppm per homogeneous materials

In addition, Ulbrich makes no intentional additions of Mercury, Radium, Alpha source or low melting point elements during processing of uncoated steel.

Sincerely,

Debra DeFelice

Debra DeFelice Environmental, Health and Safety Manager Ulbrich Stainless Steels and Special Metals, Inc.