



March 18, 2021

RE:

www.rohsguide.com

Restriction of Hazardous Substances 2002/95/EC (Jan. 27, 2003)

Recast Directive 2001/65/EU aka RoHS 2 (June 8, 2001)

Revision to Annex II 2015/863 aka RoHS 3 (March 31, 2015)

www.rohsguide.com/rohs-reach.htm

REACH Legislation as per Amended Legislation of April 7, 2020

REACH Annex XIV & Annex XVII as included in Amended Legislation of February 7, 2020

REACH Candidate List Updated 06-25-2020

To Whom it May Concern,

The European Union Chemicals Agency has issued various directives that control substances of concern in their RoHS and REACH directives.

The RoHS directive was first implemented in the EU and restricted 6 hazardous substances in electronic components: lead [Pb], hexavalent chromium [Cr-VI], mercury [Hg], polybrominated biphenyls [PBB], polybrominated diphenyl ethers [PBDE] and cadmium [Cd]. The scope of RoHS has expanded to include 4 more chemicals in Europe (DEHP, BBP, DBP, DIBP), but countries outside Europe have adopted only the original 6 substances. (Refer to www.rohsguide.com for hazardous substance list and thresholds.)

The REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) regulates chemicals manufactured in or imported into the European Union. REACH requires manufacturers or importers of substances to register them with the central European Chemicals Agency (ECHA). REACH prioritizes Substances of Very High Concern (SVHC) from the Candidate List to determine which substances should be included in the Authorization List Annex XIV. Once a substance is included in the Candidate List, it creates certain legal obligations for the importers, producers and suppliers of an article that contains such a substance. REACH defines an "Article" in Chapter 2, Article 3, as an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition. An Article is usually considered a finished product. Accordingly, the steel products supplied to your company by AM/NS Calvert are considered Articles consistent with REACH definitions and are not considered a "Substance" under the REACH definitions. (Refer to www.rohsguide.com/rohs-reach.htm for list of restricted chemicals or <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1907-20210215> for the applicable REACH definitions.)

As of the date of this letter we do not routinely analyze for the presence of these SVHC's because they are not a part of the manufacturing process, add no inherent quality to the products, and are typically, if present, below threshold concentrations:

The information in this letter is provided for the general information of customers and does not imply any warranty. The interpretation or use of this information is the sole responsibility of the user. This information is provided to you on the following conditions: (1) ArcelorMittal and AM/NS Calvert make no representations or warranties as to any tests used in preparing this letter or correctness of its contents; (2) ArcelorMittal and AM/NS Calvert shall not be liable to you or any other person for the performance, merchantability, suitability or fitness for any purpose of any material or item tested or investigated in the preparation of this letter, whether such liability is asserted on the basis of express or implied representations, warranties or conditions, in contract or tort, by statute or common law, or on any other basis; (3) you agree to hold ArcelorMittal and AM/NS Calvert harmless against any liability that may be imposed on it in connection with this letter, the manufacture of any item in reliance on it, the use of any item so manufactured or the breach of any of these conditions

1. "Lead, Cadmium and Nickel" are inherent in steel as a residual material. Lead may be present in either the steel or the galvanized coating below the 0.1% max (1000 ppm). Cadmium may be present in either the steel or the galvanized coating below the 0.01% max (100 ppm). Mercury, if present, would be below the 0.1% (1000 ppm). Chromium is routinely added to certain steel products, but our manufacturing process prevents the formation of chromium+6 phase in the final product, with the exceptions noted below.
2. Environmentally persistent transformer fluids / flame retardants are not part of the steelmaking process.
3. Likewise, the other chemical compounds noted are also not part of the steelmaking processes.

This letter applies to AM/NS Calvert flat rolled products.

The following products are currently compliant:

1. Hot Rolled and Cold Rolled Steel Sheet (Dry or oiled)
2. Hot Dipped Galvanized (Dry or oiled, passivated/chem treated with RoHS compliant trivalent chromium)
3. Hot Dipped Galvannealed (Dry or Oiled)
4. Aluminized (Dry or oiled, passivated/chem treated with RoHS compliant trivalent chromium)

The following products cannot be used where EU RoHS or ELV directives apply. The non-compliant products under current standard operating practices with hexavalent chromium requirements are:

- A) Passivated/chem treated hot dipped galvanized/galvannealed steel sheet.
- B) Hot dipped galvanized/galvannealed steel sheet that gets paintable passivation sold for post painting applications.
- C) Painted steel sheet that is toll painted at coil coaters under single bill that have not been qualified to an alternative pretreat system.

Under the REACH guidelines, a North American company that exports product to the European Union cannot register itself. REACH obligations for exporters must be fulfilled by the importers or by a company established in the European Union and nominated as the company's representative. Consequently, the registration with the ECHA of a substance covered by REACH is not ArcelorMittal North America's or AM/NS Calvert's responsibility.

If you have an interest in discussing this information further, please feel free to contact ArcelorMittal NA or AM/NS Calvert representatives noted below.



Theodore W. Fenicle
Director of Quality
ArcelorMittal North America
T: 1-219-787-4515
Theodore.Fenicle@ArcelorMittal.com



Yasunori Iwasa
Director of Quality Management
AM/NS Calvert
T: 1-251-289-3115
Yasunori.Iwasa@ArcelorMittal.com

The information in this letter is provided for the general information of customers and does not imply any warranty. The interpretation or use of this information is the sole responsibility of the user. This information is provided to you on the following conditions: (1) ArcelorMittal and AM/NS Calvert make no representations or warranties as to any tests used in preparing this letter or correctness of its contents; (2) ArcelorMittal and AM/NS Calvert shall not be liable to you or any other person for the performance, merchantability, suitability or fitness for any purpose of any material or item tested or investigated in the preparation of this letter, whether such liability is asserted on the basis of express or implied representations, warranties or conditions, in contract or tort, by statute or common law, or on any other basis; (3) you agree to hold ArcelorMittal and AM/NS Calvert harmless against any liability that may be imposed on it in connection with this letter, the manufacture of any item in reliance on it, the use of any item so manufactured or the breach of any of these conditions