



March 12, 2020

RE: REACH and RoHS Compliance

Dear Customer:

Crucible Industries LLC (Crucible) is aware of the European Regulation (EC) 1907/2006 concerning Registration, Evaluation Authorization and Restriction of Chemicals (REACH) and the requirements and exemption set by the European Restrictions on Hazardous Substances (RoHS) Directive. Based on the evaluation and declarations outlined below, Crucible is compliant with the requirements for REACH and RoHS.

REACH Declaration

According to the regulation, stainless steel products, including steel bars, flats, squares, etc. are considered as articles. This position is adopted by all European stainless steel producers as presented in the EUROFER (European Confederation of iron and steel industries) position paper determining the borderline between preparation and articles for steel and steel producers. Based on the regulation and guidance of EUROFER, Crucible is a manufacturer of articles to our EU customers.

Article 33 of REACH requires producers to communicate information on substances in articles. Crucible's products do not contain any of the 205 substances (as updated January 16, 2020) in quantities at or above 0.1% listed on the most recently published Candidate List of Substances of Very High Concern (SVHC) list. In addition, Crucible's products do not contain the substances in the Conditions of Restriction as outlined in Article 67.

RoHS Declaration

Crucible complies with the EU RoHS /WEEE and amendments, including RoHS 3 (Directive 2015/863). Crucible's Steel contains chromium in a zero valence state; therefore, Hexavalent Chromium is not present in or on our products. In addition, lead, mercury, cadmium, polybrominated biphenyl (PPB), polybrominated diphenyl ether (PBDE), or phthalates (DEHP, BBP, DBP or DIBP) are not specifically added to Crucible's steelmaking process. Any residual amounts contained in raw materials would be eliminated as part of our manufacturing process, resulting in any trace levels well below the maximum concentration thresholds specified in the directives.

Crucible is committed to meeting its legal obligations under the REACH and RoHS regulations. We further encourage our customers to refer to our Safety Data Sheet (located on our website) and the Safety Information Sheet (<http://www.eurofer.org/Eurofer%20Stainless/Safety%20Information%20Sheet/ws.res/2016%20SIS.pdf>) developed for Stainless Steel by the EUROFER members to obtain information on the safe use of stainless steel and its potential impacts on both human health and the environment.

If you have any questions pertaining to this letter, please contact Donia Zilles at (315) 470-9014. Thank you for your assistance in this matter.

Respectfully yours,

A handwritten signature in black ink that reads 'Donia Zilles'.

Donia Zilles
Director Environmental, Health and Safety
Crucible Industries LLC