



February 27, 2024

Subject: REACH Regulation (EC 1907/2006), RoHS 3 Directive (EU 2015/863), End of Vehicle Life (ELV Directive 2000/53/EC), and other Substances of Concern (SOC).

To Whom It May Concern:

REACH Regulation

The REACH Regulation generally requires the registration of substances that are manufactured in or imported into the European Union (EU) either as the substance or as part of a mixture. In general, if greater than 1 tonne is imported, registration is required. Different rules apply, however, to imports of articles.

The steel products produced by Metallus Inc. and its affiliated entities (collectively, "Metallus") are classified as articles under the REACH Regulations. An article requires registration under the REACH Regulation if the article contains a substance that is intended to be released under normal or reasonably foreseeable conditions of use. Metallus steel products are not designed to release substances under normal or reasonably foreseeable conditions of use. Therefore, under Article 7 and the ECHA guidance, registration is not required. An article requires notification under the REACH Regulation if an article contains a substance on the latest candidate list of Substances of Very High Concern (SVHC List) and the substance is present in the article in concentrations greater than 0.1 percent by weight. We reviewed the SVHC List, in effect as of January 24, 2024, and concluded that these substances are not present in the base steel material of our products at a concentration greater than 0.1%.

The potential exists that some of these substances on the REACH SVHC List could be present in trace amounts in the non-metallic coatings and finishes (paints, oils, etc.) that may be applied to the base steel material to produce the final steel products. However, if these substances were present in trace amounts in any of the coatings, the residual amount of coating that remains on the steel would be negligible. This would equate to an insignificant amount of the substance relative to the total weight of the steel product, certainly below 0.1% of the total product weight. Accordingly, if any of the substances were to be present in the coating materials, they would not trigger the notification requirements.

RoHS, ELV, and SOC

Metallus' steel products are RoHS 3 and ELV compliant and do not contain levels of restricted substances in excess of applicable threshold limits. The steel products produced by Metallus are 100 percent recyclable and should not pose any environmental concerns if scrapped in accordance with general industry practices.

Additionally, Metallus has eliminated the use of all ozone depleting chemicals from our manufacturing operations. Therefore, all steel products that are manufactured by Metallus do not contain any of the listed Class I or Class II ozone depleting substances. Further, the steel products

manufactured and supplied by Metallus do not contain or exceed the reporting requirements for any forms of Substances of Concern (SOC), including but not limited to Asbestos, Beryllium, Cadmium, Hexavalent Chromium, Mercury, Lead, Polybrominated Biphenyls (PBB) and Polybrominated Diphenyl Ethers (PBDE).

The declarations stated above are subject to the following qualifications and reservations:

- i. The information is true and correct as of the date noted above;
- ii. The declarations stated above do not cover non-metallic packaging, markings, coatings, paints, and other peripheral materials concerning our steel products; and
- iii. This statement is made solely for information purposes and shall not, unless otherwise explicitly agreed in writing, be part of any agreement between Metallus and any third party.

Regards,

Shawn Crites,
Senior Manager - Health and Safety