



06/26/2023

To: All Howard Precision Metals Customers

RE: Compliance with European Parliament Directive 2011/65/EU – Restriction of Hazardous Substances (RoHS2) and Directive 2015/863/EU (RoHS3)

Based on a good faith diligent inquiry, we do not have any reason to believe that the materials we supply have any substances added that are regulated by the RoHS directive in effect as of the date of this statement in amounts in excess of the maximum concentration values with the exception of alloy 6262.

Annex II and Annex III Exception 6b listed below are the only Annexes and Exceptions that applies to our aluminum metals industry.

ANNEX II

Restricted substances referred to in Article 4(1) and maximum concentration values tolerated by weight in homogeneous materials

- Cadmium(Cd): 0.01%
- Mercury: 0.1%
- Lead(Pb) : 0.1%
- Hexavalent chromium (Cr6+) : 0.1%
- Polybrominated biphenyls (PBB): 0.1 %;
- Polybrominated diphenyl ethers (PBDE): 0.1 %
- Bis(2-Ethylhexyl) phthalate (DEHP): Max 0.1% (added in 2015);
- Benzyl butyl phthalate (BBP): Max 0.1% (added in 2015);
- Dibutyl phthalate (DBP): Max 0.1% (added in 2015);
- Diisobutyl phthalate (DIBP): Max 0.1% (added in 2015).

Exemption per Annex III 6b: "Lead as an alloying element in steel containing up to 0.35 % lead by weight, aluminium containing up to 0.4 % lead by weight and as a copper alloy containing up to 0.4 % lead by weight"

All HPM purchase orders submitted to our mill suppliers contain the specification that materials supplied must be RoHS compliant.

The only exception to that specification is as follows:

The mill suppliers that service HPM state the only non RoHS/ RoHS2/RoHS3 compliant alloys that we currently purchase are alloy 6262 and 2011. Both of these alloys may exceed the maximum RoHS level of 0.40% lead (Pb).

All HPM material quotation and confirming sales orders supplied to our customers for alloys 6262 and 2011 contain a notation that these are not RoHS compliant.

It is essential that all statements included on your quotation and/or confirming sales orders are understood.

If you have any further question regarding this issue, please do not hesitate to contact me.

Thank you,

Howard Precision Metals Quality Department