



ATI Specialty Materials  
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**Subject: RoHS, POPs, REACH Registration, SVHC, and ODS**

RoHS:

Regarding the European Union Directives 2011/65/EU (RoHS2) and 2015/863/EU (RoHS3) – the restriction of the use of certain hazardous substances in electrical and electronic equipment:

- The content of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE), Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP), Di-isobutyl phthalate (DBP), Di-isobutyl phthalate (DIBP) in ATI Specialty Materials products do not exceed the maximum concentrations values for such substances in homogenous materials of up to 0.01% by weight for cadmium and 0.1% for the other substances. The content of these substances in our products is negligible. The chromium in our products is metallic form (zero-valent).
- Products supplied by ATI Specialty Materials are compliant with the European Union Directives 2011/65/EU (RoHS2) and 2015/863/EU (RoHS3).

POPs:

Products supplied by ATI Specialty Materials do not contain Persistent organic pollutants (POPs) as defined by the ECHA List of substances subject to POPs Regulations Annex I, III, & IV and by the ECHA List of substances proposed as POPs, both lists as of October 31, 2024. More information on substances subject to POPs regulations and proposed as POPs can be found at <https://echa.europa.eu/list-of-substances-subject-to-pops-regulation> and <https://echa.europa.eu/list-of-substances-proposed-as-pops>, respectively.

REACH Registration:

With respect to the application of European Union Regulation (EC) No 1907/2006 (REACH), the products supplied by ATI Specialty Materials (e.g. bar, billet, forgings, rod, coil, wire, and engineered parts) are articles under REACH. These articles have no intended release, as outlined in the European Chemical Agency's Guidance on requirements for substances in articles (RIP 3.8), and, therefore, there is no registration obligation under REACH for the articles.

Products supplied by ATI Specialty Materials as ingots or powder are not considered to be articles, and therefore are subject to REACH Registration. We have appointed an Only Representative for these REACH requirements.

Our Registration numbers are referenced below:

Substance	Registration Numbers
Nickel	01-2119438727-29-0100
Titanium	01-2119484878-14-0033

SVHC:

ATI Specialty Material's products do not contain any significant amounts of the 241 chemical compounds on the EU Candidate List of Substances of Very High Concern (SVHCs) as of June 27, 2024, and the maximum concentration for such substances in homogenous materials does not exceed 0.1% by weight.

Additional information on Substances of Very High Concern is found at the European Chemicals Agency's website, [echa.europa.eu](https://echa.europa.eu).

ODS:

Products supplied by ATI Specialty Materials are not manufactured with Class I Ozone Depleting Substances (ODS) and do not contain either Class I or Class II ODS. Phaseout of ODS is mandated by the Montreal Protocol. Information on the phaseout of ODS can be found at <https://www.epa.gov/ods-phaseout/phaseout-ods-under-clean-air-act>.

If you have any questions, please contact me.

Best Regards,



Michael J Shuble  
Sr. Director EHS&S  
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