

July 28, 2026

Subject: Product Compliance Statement

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 as of November 18, 2025 and by the ECHA List of substances proposed as POPs as of January 5, 2026. The ECHA List of substances proposed as POPs contains all substances that have been proposed for listing in Annex A, Annex B, and/or Annex C of the Stockholm Convention. 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:



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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 253 chemical compounds on the EU Candidate List of Substances of Very High Concern (SVHCs) as of February 4, 2026, 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.

REACH Restrictions:

With respect to Annex XVII of European Union Regulation (EC) No 1907/2006 (REACH Restrictions), two of the restrictions apply to nickel and cobalt containing products in certain end uses. ATI Specialty Materials' products are not manufactured for end uses with REACH Annex XVII restrictions on uses in the 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>.

California Proposition 65

The corresponding Safety Data Sheet for each product produced by ATI Specialty Materials indicates whether that product may contain California Proposition 65 substances and, if so, which one(s).

TSCA PBT Substances

TSCA Persistent, Bioaccumulative, and Toxic (PBT) substances are not present in products supplied by ATI Specialty Materials.

Bisphenol A

Bisphenol A (BPA) is not present in products supplied by ATI Specialty Materials.
EU Medical Device Regulation

With respect to Medical Device Regulation (MDR, per 2017/745/EU), devices cannot contain Category 1A or 1B substances above 0.1% weight-by-weight without strict clinical justification. Cobalt is a CMR 1A or 1B substance, so the EU Medical Device Regulation applies to ATI's products containing 0.1% or more cobalt used in medical devices in the EU. See the corresponding Product Data Sheet for the cobalt content of the alloy.



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Per- and Polyfluoroalkyl Substances (PFAS)

ATI Specialty Materials has determined that the products that ATI Specialty Materials manufactures do not contain per- and polyfluoroalkyl substances (PFAS). ATI Specialty Materials has also determined that its processes do not contain any of the 196 PFAS presently listed under EPA's Supplier Notification Requirements. Effective November 30, 2023, EPA removed the de minimis exemption for Toxics Release Inventory reporting and Supplier Notification Requirements for certain PFAS. ATI Specialty Materials has evaluated the potential presence in ATI Specialty Materials' process supplies of any of the 196 PFAS presently listed under EPA's Supplier Notification Requirements by reviewing all SDS and product Environmental Data Sheets in its possession that were issued on or after November 30, 2023.

If you have any questions, please contact me.

Best Regards,

Michael J Shuble
Sr. Director EHS&S
ATI Specialty Materials