ThyssenKrupp Materials NA Copper and Brass Sales Division



March 19, 2012

Statement of Compliance Restriction of Hazardous Substances Directive or RoHS

Thank you for your enquiry seeking clarification about how ThyssenKrupp Material NA – Copper and Brass Sales Division is fulfilling our obligations under the RoHS Directive, specifically those obligations related to obligations related to compliance reporting and material content disclosure related to substances contained in the metallic products that we supply identified as "Homogeneous Material".

The chemical substances contained within the current RoHS Directive are, to the best of our knowledge, not used in any of Copper and Brass Sales' processes, or intentionally added to any of the metals supplied and/or processed by Copper and Brass Sales. The metals we supply are produced from a list of elements, predetermined by known industry specifications, which do not include chemicals from the RoHS Directive, except for items 6(a), 6(b), 6(c) and 8(b) in the current RoHS exemption listing. RoHS chemicals, other than exempt items 6(a), 6(b), 6(c) and 8(b) not expected to be present in the metals we supply; but the exact P.P.M. content cannot be stated since the substances are not analytically tested for by our metal producing mill suppliers. Copper and Brass Sales has informed all of our major metal suppliers of the RoHS Directive and have requested that they notify us of their use of the listed chemicals. In addition, a chemical breakdown of each metal alloy is contained in the Material Certification (MTR) and/or Material Safety Data Sheets (MSDS) that Copper and Brass Sales supply's with every order shipped.

James K. Baber

Sr. V.P. of N.A. Operations

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