



Samuel Son and Co. Inc-Denver

Quality Management System

Quality Products for World Class Customers by Dedicated People

QMS Dependencies:

Samuel Son and Co, Inc Denver, Quality Management System is dependent upon the following:

Corporate Management, Corporate Quality Assurance and Corporate Environmental Health and Safety:

To provide Policy and objectives, including corporate strategic objectives, which lend themselves to the development of business plans, both short and long term. To provide, as applicable, necessary audits, guidance and/or instruction on how corporate policy/objectives and continual improvement through best practices are to be maintained.

Corporate Finance/Credit: To provide support to the processes and process owners through financial reporting, as well as managing the credit process and accounts receivable support processes as identified within this QMS. Corporate financial reports provide data used for monitoring and measuring the processes and for monitoring the financial budget.

Corporate Information Systems (IS): To provide support in developing and maintaining electronic communications. The corporate IS group maintains the electronic environment which is vital to our day-to-day business activities. These activities are noted within this manual under the processes which they support. Many of these support activities also act as part of our contingency plans. (Examples include virus protection/Server (computerized data) backup/ASN and EDI capabilities/security for computer access and Help Desk). The IS Group also provides and controls, through the Samuel Intranet, documented guidance on the use of the server (also known as the LAN and the AS400). These "guidance" documents acts as a valuable aid for process owners/managers in training the various process users in specific tasks of the various business units defined within this QMS. IT projects are approved and controlled to provide "fixes" to systemic electronic breakdowns/failures as reported by the organization. The "fixes" are noted as projects by the IT Group, and can be referenced through the Samuel Intranet. Also, daily IT communication through e-mail is used to advise the Users of the completion of approved projects.

Corporate Engineering: To provide support in the scoping, acquisitions and installment of manufacturing equipment used to handle and/or transport product and to process product to the customers' requirements. Engineering oversees all regulatory requirements pertaining to the installment of equipment such as guarding, and maintains all records of equipment validation. Engineering supplies the manufacturing process AutoCAD drawings of the equipment and the plant layouts

Corporate Purchasing: To establish and/or provide guidance for selection of suppliers, to negotiate and advise on pricing and availability of product including offshore, to establish business programs and, to interact with the suppliers pertaining to corrective actions. Corporate Purchasing also act as buyers and controls/provides for all Samuel, RoHS and MSDS documentation that may be used to support a customer's specific requirement/request. The documentation is controlled through the Samuel website and/or the LAN specifically. Note RoHS (LAN/G drive), MSDS (website). Note: Corporate Purchasing is not responsible for the selection and approval of Mill suppliers used by the respective branches to satisfy their specific product needs which are controlled through the respective Quality System controls for supplier's approval.

Corporate Marketing: To provide support in the advertising and growth of the business designed to attract potentially new or expanded business.

In addition to the dependencies noted above, additional dependencies are utilized to save on cost through the utilization of other Samuel locations, or personnel that specialize in various tasks that may be required within the processes on occasion. An Example is drafting/drawings for plasma burning. When required this task is performed by another Samuel location that has the technology and knowledge, and specialize in the ability to create drawings for the plasma burning equipment/process.

Approved by: Dave Hollar
Effective: 05/14/10
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ACCIAIERIE VALBRUNA s.p.a.



Vicenza, 13/02/2017

To whom it may concern

“Subject: usage of our material according to DM 104/1973 and following revisions,
DM140/2013 and CE1935/2004 and 2023/2006.

Acciaierie Valbruna Spa states that 300 series stainless steel material, listed in the EN 10088- and produced in our Vicenza and Bolzano plants, are conform to what requested by Italian national norm DM 104/1973 and following revisions DM 140/2013, Euronorm 1935/2004 and 2023/2006 and can be hence declared suitable to be used for the production of items intended to be in close and direct contact with human food and beverage.

Best regards.”

QUALITY MANAGER
Bertelli Ing. Roberto



NORTH AMERICAN STAINLESS



6870 Highway 42 East
Ghent, KY 41045-9615

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January 27, 2017

Dear Valued Customer,

This letter is regarding material that has been manufactured by North American Stainless (NAS) and supplied to you. This letter applies to all grades of stainless steel manufactured by NAS.

All material meets the EU directive regarding the End of Life Directive (ELV Directive 2000/53/EC) and the certification that Mercury, Cadmium, Zinc, Lead and Hexavalent Chromium are not present in levels above the thresholds established by the aforementioned directive and are not intentionally added or desired components (Rohs Directive 2002/95/ED). In addition, the EU Directive was amended via EU document C (2005) 3143, 2005/618/EC on Aug. 18, 2005 that excluded all grades of Stainless Steels from compliance with the EU RoHS requirements. NAS also complies with RoHS2 (Directive 2011/65/EU).

RoHS Directive Maximum Concentration Values

	Maximum Concentration Value (by weight in <u>homogeneous</u> <u>material</u> *)
Lead	0.1%
Mercury	0.01%
Cadmium	0.01%
Hexavalent Chromium	0.1%
Polybrominated Biphenyls (PBB's)	0.1%
Polybrominated Diphenyl Ethers (PBDE's)	0.1%
Bis(2-ethylhexyl) Phthalate (DEHP)	0.1%
Benzyl butyl phthalate (BBP)	0.1%
Dibutyl phthalate (DBP)	0.1%
Diisobutyl phthalate (DIBP)	0.1%

Our stainless steels do not contain Teflon or other such organic VOC containing materials (PBB, BDE, PFOS, or PBDE) and are not intentionally added as part of the manufacturing process. Any such organics that would qualify as a VOC that may be attached to or commingled with our scrap would vaporize due to the extremely high temperatures required to produce molten metal and produce a desired grade through addition of alloys.

I certify this to be true and accurate to the best of my knowledge based upon process knowledge, industry standards, and/or chemical testing.

If I can be of further assistance please do not hesitate to contact me with any questions or additional requests regarding our product.

Sincerely,

A handwritten signature in cursive script, appearing to read "Maria Eichelberger".

Maria Eichelberger
Environmental Manager
North American Stainless