

Zapp Precision Metals GmbH, Letmather Straße 69, 58239 Schwerte, Germany

To all customers of the United States sites of
Zapp Precision Strip, Inc.,
Zapp Precision Wire, Inc., and
Zapp Tooling Alloys, Inc.

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**Declaration of our grades- General Information for Zapp Precision Strip, Inc.,
Zapp Precision Wire Inc., and Zapp Tooling Alloys Inc.**

Dear Sir or Madam,

We would like to make the following statement with reference to your inquiry:

RoHS Directive 2011/65/EU and the RoHS Amendment (EU) 2015/863.

All materials supplied by us are in accordance with this regulation.

During the production of metallic semi-finished products and metallic products, the introduction of undesirable elements such as lead (Pb), mercury (Hg) or cadmium (Cd), especially during the melting process, cannot be completely ruled out for technical reasons. Material analyses of our materials have so far shown that the concentration of these elements is below the analytical detection limit of 10 ppm. For this reason, our materials are described as free of pollutants.

The metal chromium is not present in our materials as toxic hexavalent chromium. Some of our materials contain the alloying element chromium according to international standards. However, this chromium is present in the material in metallic form and thus in valence grade zero. Hexavalent chromium is added neither during melting nor later. For thermodynamic reasons, it cannot form by itself in tool steels and in Co- and Ni-based alloys. For these reasons, it can be safely assumed that our marketed materials are free of hexavalent chromium and are therefore, for these as well as for other reasons, absolutely harmless to health when in use.

**Zapp Precision Metals
GmbH**

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REACH:

Statement on “substances of very high concern” (SVHC) according to the Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), published on the 30 December 2006 in the Official Journal of the European Union 396/1.

We comply with the information requirements on „Substances of Very High Concern” („SVHC”; Candidate List of Substances of Very High Concern for authorization) in articles according to Article 33 of Regulation (EC) No. 1907/2006 (REACH Regulation). As „downstream user” and as „supplier of an article” under REACH we are forced to pass on information along the supply chain. Unfortunately, it is unclear to many companies what these information requirements actually mean. This often results in situations where companies along the supply chain urge each other to confirm „REACH compliance” of articles. Such statements are not intended by REACH. For companies they only cause additional expenses but generate neither legal certainty nor other real benefit. Therefore, we would like to inform you what information you will receive from us as „supplier of an article” in accordance with the requirements of REACH.

Information requirements according to Article 33

The products we supply are legally defined as articles¹. According to Article 33(1) REACH, any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.

If such cases occur, we will properly comply with the information requirements in order to ensure the safe handling of our high-quality articles. Furthermore, we are in close contact with our suppliers. Based on our risk assessment there are no indications which will lead to a specific sample analysis up to now. According to the information available we currently assume that our articles do not contain any SVHC in a concentration above 0,1 % weight by weight (w/w). Therefore, we are not affected by the requirements of § 16f ChemG or art. 9 (1) (i) and art. 9 (2) of the Directive 2008/98/EC of 19 November 2008 on waste. An entry in the SCIP Database is therefore not necessary.

Once we have further information, we will inform immediately and coordinate appropriate measures. Due to our broad range of articles and due to the fact that we are depending on the information coming from our suppliers, who also have to fulfil the information requirements, you will certainly understand that we are not able to give further legally binding statements.

REACH implementation in our company

The expert group „Environment and occupational safety“ of WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. regularly informs us about proposed substances for the Candidate List, public consultations, new SVHC on the Candidate List² and about the relevance of SVHC. The published information on uses of SVHC show that the products supplied do not contain any of these substances.³

By providing this information letter, we to fulfil our information requirements as a „supplier of an article“ according to Article 33(1) REACH we are following legal provisions and recommendations of WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. This statement applies only to the article / articles supplied by us. Modifications of the article / articles within the processing are thereby not covered.

We have complied with the legally required notifications to the European Chemicals Agency (ECHA) in accordance with § 16f ChemG.

TSCA Section 6(h) Toxic Substances Control Act

Our products do not contain any chemicals listed in this regulation.

Conflict Minerals:

The European Regulation 2017/821 of the European Parliament and Council of 17 May 2017 is not relevant for our distributed products.

Our metallic materials may contain "Conflict Minerals" as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act pursuant to implementing regulations dated August 22, 2012.

Certain strip, wire, and tool steel products can be alloyed with tantalum (Ta), tungsten (W) or cobalt (Co) (especially tool steels) or consist essentially of cobalt (e.g. Co-Cr materials). We source all raw materials and merchandise exclusively from reputable manufacturers and have obtained appropriate information from our suppliers regarding the origin of potential 3TGs. All our suppliers are obliged to comply with the Conflict Minerals regulations, and we have the corresponding confirmations from all suppliers that either no conflict materials are used in their materials; or the corresponding CMRT and/or EMRT templates have been provided for the relevant materials.

¹Art. 3 no. 3 REACH: article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition

²<http://echa.europa.eu/candidate-list-table> and <http://www.reach-clp-biozid-helpdesk.de/de/REACH/Kandidatenliste/Kandidatenliste.html>

³<http://echa.europa.eu/web/guest/information-on-chemicals/candidate-list-substances-in-articles-table>

Radioactivity:

Initially, it has been established that radioactivity is inevitably to be found everywhere in nature. In this way our environment exhibits natural and, in this form, non-hazardous radiation everywhere. This also applies to steel products without restrictions. We have already taken several measures at an early stage to avoid any contamination above the natural level.

We have been conducting a dialog with our primary material suppliers about the measures they have implemented against the – in particular radioactive – contamination of their products. We have received confirmation from our suppliers in this regard that their products conform to the pertinent legal regulations and that these products are within admissible limits, particularly with regard to radioactivity.

We also confirm that the materials supplied are free of artificial radioactivity.

POPs / Bisphenol A / Phtalate / PAH Ingredients:

These substances are organic compounds. They are not an alloying element and no component in steel making. They cannot exist in steel.

PFAS / PFOS / PFOA / Silicones / Halogens / Latex / Substances & tissues of animal origin:

These substances are not an alloying element or a component in metal production. The ingredients cannot be found in our supplied materials.

Nanoparticles:

Our semi-finished products do not contain any nanoparticles that are harmful to health.

For any further questions do not hesitate to contact us.

Best regards



Dr.-Ing. Wolfgang Püttgen

Quality Management Representative of the Zapp Group