

September 19, 2011

Statement of Compliance
REACH – Substances of Very High Concern (SVHC)

Thank you for your enquiry seeking clarification about how ThyssenKrupp Materials NA – Copper and Brass Sales Division is fulfilling our obligations under the REACH Regulation, specifically those obligations related to registration, notification and / or communication requirements related to substances contained in the metallic products that we supply identified as **articles**.

The chemical substances contained within the current REACH Regulation 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 REACH - SVHC. REACH – SVHC are 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 metals suppliers of the REACH Regulation and have requested that they notify us of their use of the SVHC.

Rush D. Williams
Director of Quality
ThyssenKrupp Materials NA
Copper and Brass Sales Division