COMBINED
METALS COMPANY

CMC Declaration of Product Compliance

Combined Metals Company, LLC (CMC) and its affiliates, Elgiloy Specialty Metals, Combined Service Centers and Gibbs Interwire, provide products to our customers that conform to the specifications and designs specifically dictated by that customer. Based on the regulations and the supporting guidance documents that support these regulations, the items that you purchase from CMC meet the full definition of "articles." We do not deliver, in the form of our products or packaging, any articles that involve the intentional release of hazardous substances.

Please note that this declaration applies to ALL materials processed and sold by CMC, but does not apply to any materials subsequently added, altered, converted or manufactured by others.

1. EU RoHS

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☒**Comply**

☐**Do Not Comply**

☐**Comply with exemption**

with the RoHS Directive (EU Directive 2002/95/EC and subsequent amendments). RoHS compliant means that the substances listed by the EU Directive 2011/65/EU (RoHS 2) and the EU Directive 2015/863/EU (RoHS 3), as well as subsequent amendments by the European Parliament, as restricted, are not present in a finished product above the threshold limits. EU RoHS specifies maximum levels for the following 10 substances.

RoHS guide: https://www.rohsguide.com/

2. EU REACH SVHC

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

listed substances at concentrations above de minimis (<0.1%) concentrations according to the most recent REACH SVHC regulatory listing of 2/4/2026 and the EC No 1272/2008 Annex VI CLP ATP20 list of candidate Substances of Very High Concern (SVHC).

SVHC guide: https://www.echa.europa.eu/candidate-list-table

3. EU REACH ANNEX XIV

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

listed substances at concentrations above de minimis (<0.1%) concentrations according to the most recent REACH Annex XIV list of 02/22/26.

Authorization List: https://echa.europa.eu/authorisation-list

4. EU REACH ANNEX XVII

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

listed substances at concentrations above de minimis (<0.1%) concentrations according to the most recent REACH Annex XVII list of 6/23/25.

REACH guide: https://echa.europa.eu/regulations/reach/understanding-reach

5. California Proposition 65

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

banned or restricted substances listed in California Proposition 65 list. (last updated on 07/31/2026).

List of Proposition 65 listed chemicals: https://oehha.ca.gov/proposition-65/proposition-65-list

6. US Toxic Substances Control Act (TSCA)

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

listed chemicals in the TSCA Chemical Substance Inventory. (last updated 07/2026)

USEPA TSCA - https://www.epa.gov/tsca-inventory/how-access-tsca-inventory#download

7. US TSCA – Chemicals Under Evaluation by TSCA

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

chemicals substances currently undergoing risk evaluation under TSCA Section 6 (b)(4)**.**

TSCA Chemical Risk Evaluations: https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/ongoing-and-completed-chemical-risk-evaluations-under

8. Persistent Organic Pollutants (POP)

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

listed substances in the Persistent Organic Pollutant (EU POP) regulation (EU) 2019/1021 as updated on September 23, 2025, including, but not limited to, all PFOA and PFOS restrictions listed in Annex I – those with prohibition on manufacturing, placing on the market and use, Annex II – those with restrictions on manufacturing, placing on the market and use, Annex III – those subject to release reduction provisions, Annex IV, those subject to waste management provisions.

EU POP: https://echa.europa.eu/pops-legislation

9. Per - & Polyfluoroalkyl Substances (PFAS)

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

listed Per- and Polyfluoroalkyl substances by the USEPA., updated 10/2025.

USEPA PFAS: https://www.epa.gov/pfas

10. Medium-Chain Chlorinated Paraffins (MCCP)

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

medium-chain chlorinated paraffin compounds.

European Chemicals Agency Proposal:
https://echa.europa.eu/documents/10162/2beed524-ab79-06eb-5101-15112b042f51

11. Prior Informed Consent Regulation (PIC)

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

listed substances in Annex I, Annex V or mixtures containing such chemicals in a concentration that triggers labelling obligations under the CLP Regulation (EC) No 1272/2008 (irrespective of the presence of any other substance), as well as to articles containing these chemicals in an unreacted form to the PIC regulation as of 06/04/2026.

ECHA: https://echa.europa.eu/regulations/prior-informed-consent/understanding-pic

12. EU Medical Device Regulation (MDR)

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

listed substances in the EU MDR, Annex VI, ATP23, section 10.4.1, in accordance with Part 3 of Annex VI from Regulation (EC) # 1272/2008 and EU REACH Regulation (EC) # 1907/2006 Candidate List, in any concentration.

ECHA's CLP list: https://echa.europa.eu/information-on- chemicals/annex-vi-to-clp

13. EU Ozone Regulation

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

ozone depleting substances listed in EC # 1005/2009 Annex A, B, C, D, E, F.

Montreal Protocol: https://www.unep.org/ozonaction/who-we-are/about-montreal-protocol

14. IEC 62474 Declarable Substance List (DSL)

Combined Metals Company, LLC hereby certifies that products manufactured by CMC,

☐**Contain**

☒**Do Not Contain**

substances on the IAEG Declarable Substance list of 03/06/2026.

IEC 62474 database: https://std.iec.ch/iec62474/iec62474.nsf/Index?open&q=211109

15. IAEG Declarable Substance List (AD-DSL)

Combined Metals Company, LLC hereby certifies that products processed and sold by CMC,

☐**Contain**

☒**Do Not Contain**

substances on the AD-DSL list of 05/2025.

AD-DSL database: https://www.iaeg.com/chemicalrpt/addsl/

16. Chemicals Prohibition Ordinance - ChemVerbotsV (Germany)

Combined Metals Company, LLC hereby certifies that products manufactured by CMC,

☒**Comply**

☐**Do Not Comply**

with the ChemVerbotsV Ordinance last updated 08/07/2026.

ChemVerbotsV Ordinance - https://www.chemical-check.com/safety-at-work/prohibited-chemicals-ordinance-chemverbotsv/

17. End-of-Life Vehicle Act (AltfahrzeugG) (Germany)

Combined Metals Company, LLC hereby certifies that products manufactured by CMC,

☒**Comply**

☐**Do Not Comply**

with the End-of-life Vehicle Act (AltfahrzeugG) of 21 June 2002 (Federal Law Gazette I, p. 2199), which for the most part entered into force on 1 July 2002, transposes Directive 2000/53/EC on end-of-life vehicles (ELV Directive) into German law. Article 3 of the End-of-life Vehicle Act amended the End-of-life Vehicle Ordinance of 4 July 1997 (Federal Law Gazette I, p. 1666).

AltfahrzeughG Ordinance - https://www.bundesumweltministerium.de/en/topics/circular-economy/types-of-waste-and-waste-flows/end-of-life-vehicles/legislation-in-germany-end-of-life-vehicle-ordinance

18. Battery Directive (Directive 21308/88/EC)

Combined Metals Company, LLC hereby certifies that products manufactured by CMC,

☒**Comply**

☐**Do Not Comply**

with EU Battery Regulation 2023/1542 last updated on 07/2023

EU Batter Directive - https://echa.europa.eu/understanding-batteries-regulation

19. EU Waste Framework (SCIP) – (Directive 2008/98/EC)

Combined Metals Company, LLC hereby certifies that products manufactured by CMC,

☒**Comply**

☐**Do Not Comply**

with Directive 2008/98/EC.

Waste Framework - https://eur-lex.europa.eu/eli/dir/2008/98/oj/eng

20. Heavy Metals Compliance – (Directive 94/62/EC)

Combined Metals Company, LLC hereby certifies that packaging for the products,

☒Comply

☐Contains but comply with thresholds & labeling

☐Do Not Comply

with Directive 94/62/EC of 12/20/94.

Packaging Waste Directive 94/62/EC - https://eur-lex.europa.eu/eli/dir/1994/62/oj/eng

21. Recycled Content

Combined Metals Company, LLC hereby certifies the following information regarding recycled content in the packaging of CMC products.

☒Pre-Consumer Content

☐Post-Consumer Recycled Content

☐Bio-based Content

22. Global Automotive Declarable Substance List (GADSL)

Combined Metals Company, LLC hereby certifies that products manufactured by CMC,

☐Contain

☒Do Not Contain

substances on the Global Automotive Declarable Substance List, revised 03/01/2026.

Global Automotive Declarable Substance: https://www.gadsl.org/

23. Emergency Planning and Community Right-to-Know Act (EPCRA)

Combined Metals Company, LLC hereby certifies that products processed by CMC,

☒Contain

☐Do Not Contain

substances on the EPCRA hazardous chemical list that require TRI Form R submissions for each of the TRI listed chemicals in its products. These substances are reviewed and TRI Form Rs are submitted annually.

EPCRA website: https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities#q1

24. Classification, Labelling and Packaging (CLP)

Combined Metals Company, LLC hereby certifies that products processed by CMC,

☐Contain

☒Do Not Contain

substances with a harmonized classification of Carcinogenic, Mutagenic or Toxic to Reproduction (CMRs) category 1A or 1B as listed in Annex VI Part 3 of Regulation (EC) No 1272/2008 “CLP Regulation”, substances with a harmonized classification of Carcinogenic, Mutagenic or Toxic to Reproduction category 2, considered as having endocrine-disrupting properties, as listed in Annex VI Part 3 of Regulation (EC) No 1272/2008 “CLP Regulation”, and substances with a harmonized classification of Skin Sensitizers category 1 as listed in Annex VI Part 3 of Regulation (EC) No 1272/2008 “CLP Regulation”.

CLP: https://echa.europa.eu/en/information-on-chemicals/annex-vi-to-clp

25. European Union Directive 2011/65/EC

Combined Metals Company, LLC hereby certifies that products processed by CMC,

☐**Contain**

☒**Do Not Contain**

lead, mercury, chromium (VI), polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE), bis (2-ethylhexyl) phthalate (DEHP), benzyl butyl phthalate (BBP), dibutyl phthalate (DBP) diisobutyl phthalate (DIBP) at a concentration above 0.1% by weight of the homogenous material or cadmium at a concentration above 0.01% by weight of the homogenous material.

EU Directive 2011/65/EC: https://eur-lex.europa.eu/eli/dir/2011/65/2023-09-01

26. European Union Directive 1994/62/EC – Packaging and Packaging Waste (PPW)

Combined Metals Company, LLC hereby certifies that products processed by CMC,

☐**Contain**

☒**Do Not Contain**

packaging containing lead, cadmium, mercury or hexavalent chromium at a concentration above 100 ppm by weight combined.

PPW: https://eur-lex.europa.eu/eli/dir/1994/62/oj

27. Consumer Product Safety Improvement Act (CPSIA)

Combined Metals Company, LLC hereby certifies that products processed by CMC,

☐**Contain**

☒**Do Not Contain**

products containing lead and/or phthalates.

CPSIA: https://www.cpsc.gov/Regulations-Laws--Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act

28. Canada Chemicals Management Plan 2023

Combined Metals Company, LLC hereby certifies that products processed by CMC,

☐**Contain**

☒**Do Not Contain**

schedule 1 substances at a concentration equal to or above 0.1% by weight.

CMP 2023: https://canadagazette.gc.ca/rp-pr/p1/2023/2023-06-24/html/notice-avis-eng.html#na2

29. Asbestos and Asbestos Containing Material

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☐**Contain**

☒**Do Not Contain**

asbestos containing material.

EPA website: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-751/subpart-F

30. Latex

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☐**Contain**

☒**Do Not Contain**

latex containing material.

FDA website: https://www.ecfr.gov/current/title-21/chapter-I/subchapter-H/part-801/subpart-H/section-801.437

31. Toxic Substances Control Act (TSCA) – Phthalates

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☐**Contain**

☒**Do Not Contain**

phthalate chemical containing material.

EPA website: https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/phthalates

32. REACH & CLP - Nanomaterials

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☐**Contain**

☒**Do Not Contain**

nanomaterials that fall under existing REACH and CLP definitions.

European Chemicals Agency website: https://echa.europa.eu/regulations/nanomaterials

33. REACH - Polyvinyl Chloride

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☐**Contain**

☒**Do Not Contain**

polyvinyl chloride (PVC) that fall under existing REACH regulations.

European Chemical Agency website: https://echa.europa.eu/substances-restricted-under-reach

34. FDA – Bisphenol A (BPA) / Bisphenol S (BPS)

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☐**Contain**

☒**Do Not Contain**

Bisphenol A (BPA) or Bisphenol S (BPS) that fall under existing FDA and EU 2024/3190 regulations.

FDA website: https://www.fda.gov/food/food-packaging-other-substances-come-contact-food-information-consumers/bisphenol-bpa

EU 2024/3190 website: https://eur-lex.europa.eu/eli/reg/2024/3190/oj/eng

35. REACH / FDA - Melamine

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☐**Contain**

☒**Do Not Contain**

melamine that falls under existing FDA and EU REACH regulations.

European Chemical Agency website: https://echa.europa.eu/authorisation-list
FDA website: https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-177/subpart-B/section-177.1460

36. EU GMP 2023/2006 - EU 1935/2004 - EU 10/2011

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒**Comply**

☐**Do Not Comply**

with EU GMP 2023/2006 regulations related to good manufacturing practice for materials and articles intended to come into contact with food.

EU GMP 2023/2006 website: https://eur-lex.europa.eu/eli/reg/2006/2023/oj/eng
EU 1935/2004 website: https://eur-lex.europa.eu/eli/reg/2004/1935/oj/eng
EU 10/2011 website: https://eur-lex.europa.eu/eli/reg/2011/10/oj/eng

37. Food and Drug Administration (FDA) GRAS

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒**Comply**

☐**Do Not Comply**

with FDA sections 201(s) and 409 and are not intentionally added to food as a food additive, therefore not requiring a GRAS statement.

FDA website: https://www.fda.gov/food/food-ingredients-packaging/generally-recognized-safe-gras

38. Canadian – Packing Material Food Packaging Regulations

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒**Comply**

☐**Do Not Comply**

with Canadian Division 23 Section B.23.001, Food Packaging Regulations.

Canadian Division 23 website: https://www.canada.ca/en/health-canada/services/food-nutrition/food-safety/packaging-materials.html

39. CoE Resolution AP (2004) – Coatings

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒**Comply**

☐**Do Not Comply**

with the Council of Europe's framework resolution on coatings intended to come into contact with foodstuffs

CoE website:
https://search.coe.int/cm#{%22CoEIdentifier%22:[%2209000016805db883%22],%22sort%22:[%22CoEValidationDate%20Descending%22]}

40. Heavy Metals

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒**Comply**

☐**Do Not Comply**

with REACH, RoHS, Consumer Product Safety Improvement Act (CPSIA), California Proposition 65, Federal Hazardous Substances Act, Consumer Product Safety Act and Model Toxics in Packaging legislation.

FHSA website: https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/FHSA-Requirements
CPSIA website: https://www.cpsc.gov/Regulations-Laws--Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act
California Proposition 65 website: https://oehha.ca.gov/proposition-65

41. Mercosur Product Compliance

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒**Comply**

☐**Do Not Comply**

with Mercosur product safety standards.

Mercosur website: https://www.mercosur.int/en

42. Mineral Oils & Hydrocarbons

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒**Comply**

☐**Do Not Comply**

with FDA standards for mineral oils and hydrocarbons.

FDA website: https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-178/subpart-D/section-178.3620

43. China National Standard GB 4806.9-2023

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒**Comply**

☐**Do Not Comply**

with GB 4806.9-2023 Metal Materials and Products for Food Contact.

GB 4806.9-2023: https://www.chinesestandard.net/PDF.aspx/GB4806.9-2023?English_GB%204806.9-2023

44. Mercury Free Statement

Combined Metals Company, LLC hereby certifies that products processed by CMC, and all associated packaging,

☒ **Does not contain greater than detection limits of 0.1% (1000 ppm)**

☒ **Has not come into direct contact with**

mercury, mercury compounds or any mercury containing device.

Mercury free is defined as a product in which concentration values of mercury by weight in homogeneous materials do not exceed 0.1% (1000 ppm).

45. Halogen Free Statement

Combined Metals Company, LLC hereby certifies that, based on information received from our suppliers, as well as a knowledge of our manufacturing and packaging processes, the material processed by CMC,

☒ Does not contain greater than the IEC standard IEC 61249-2-21 definition of Halogen free

☒ Has not come into direct contact with Halogens

The definition of "Halogen Free" used by the International Electrochemical Commission (IEC) is defined in standard IEC 61249-2-21. This states that a product can be called "Halogen Free' if it contains less than

- 900 ppm Chlorine
- 900 ppm Bromine
- 1500 ppm total halogens

Understanding Halogen free standards: https://www.regilient.ai/blog/understanding-halogen-free-standards-iec

46. Radiation Free Statement

Combined Metals Company, LLC hereby certifies that, based on information received from our suppliers, as well as a knowledge of our manufacturing and packaging processes, the material processed by CMC

☐ **Does**

☒ **Does Not**

emit ionizing radiation in excess of 0.5µSv/hr (50 microrems/hr) above background levels as measured no more than 1 meter from source.

Understanding radiation: https://www.nrc.gov/about-nrc/radiation/health-effects/radiation-basics
https://www.nrc.gov/materials/types

47. EU Ship Recycling Regulation

Combined Metals Company, LLC hereby certifies that, based on information received from our suppliers, as well as a knowledge of our manufacturing and packaging processes, the material processed by CMC

☐ **Does**

☒ **Does Not**

contain substances on the EU-SRR substance list above threshold.

Information on the EU SRR: https://www.varuna-sentinels.com/what-is-eu-ship-recycling-regulation

For communications related to CMC's product compliance, please contact:

Matt Rubas

Combined Metals Company, LLC

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