



RoHS 3 Compliance Statement

January 01, 2023

Waste Electrical and Electronic Equipment Regulations 2013

Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012, Directive (EU) 2015/863 of 31 March 2015 (also known as “RoHS 3”).

These directives implement environmental legislation which seeks, via the RoHS, to reduce the quantity of hazardous material in electrical and electronic products and, via the WEEE Directive, to promote more environmentally friendly design and greater recycling of material in similar products.

The EU Government added four additional substances in the RoHS 3 directive (2015/863), the additional four substances shall be applied by 22 July 2019 except where exemptions permit.

RoHS specifies maximum levels for the following 10 restricted substances; the first six apply to the original RoHS while the latter four were added under RoHS3:

Lead (Pb): < 1000 ppm

Mercury (Hg): < 1000 ppm

Cadmium (Cd): < 100 ppm

Hexavalent Chromium: (Cr VI) < 1000 ppm

Polybrominated Biphenyls (PBB): < 1000 ppm

Polybrominated Diphenyl Ethers (PBDE): < 1000 ppm

Bis(2- Ethylhexyl) phthalate (DEHP): < 1000 ppm

Benzyl butyl phthalate (BBP): < 1000 ppm

Dibutyl phthalate (DBP): < 1000 ppm

Diisobutyl phthalate (DIBP): < 1000 ppm

Ascent Tubular Products (formerly known as Brismet) products are manufactured from materials melted by others.

These substances are not intentionally added during manufacturing processes performed at our facilities and are consequently only present as technically unavoidable trace impurities in concentrations well below the specified limits in materials as procured. Ascent Tubular Products does not have visibility of where or how the end user will use procured products.

Ascent Tubular Products has determined that it has no compliance obligations under RoHS or RoHS 3 which deals with heavy metals in electrical equipment. As part of its due diligence, we have contacted our current suppliers to verify their continued compliance with the regulations. The only exception to compliance is where a grade of material is ordered by a customer where the British, European or International Standard covering the grade requires a deliberate addition of one or more of the substances in order to comply with the standard/grade requirements. In this case, the material will contain a value of each substance in line with the standard requirements.

The situation will be reviewed annually and this statement up-dated accordingly.

A handwritten signature in black ink, appearing to read 'James R. Baines III'.

James R. Baines III

Director of Product Development & Quality

Ascent Tubular Products