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## **CMC Declaration of Product Compliance**

Combined Metals Company, LLC (including Gibbs Interwire) provides products to our customers which conform to the specifications and designs specifically dictated by that customer. Based on the regulations and guidance documents that support the 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 only applies to materials processed and sold by Combined Metals and does not apply to any materials subsequently added, altered, converted or manufactured by others.

### **1. EU RoHS**

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

- Comply**
- Do Not Comply**
- Comply with exemption**

with EU RoHS - as defined in Commission Delegated Directive (EU) 2015/863 of 31 March 2015 containing the 10 substances amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances.

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

### **2. EU REACH SVHC**

Combined Metals 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 11/6/2025 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 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.

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

### **4. EU REACH ANNEX XVII**

Combined Metals 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.

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

### **5. California Proposition 65**

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



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Contain

Do Not Contain

banned or restricted substances listed in California Proposition 65 list. (last updated on 1/3/2025).

List of Proposition 65 listed chemicals: <https://oehha.ca.gov/proposition-65/proposition-65-list>. Many of the alloys contain Nickel, but there is an exemption for Nickel in alloys which allows the parts to be considered "compliant."

#### **6. US TSCA- PBT Section 6(h)**

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

Contain

Do Not Contain

TSCA-PBT listed chemicals as per the US EPA Persistent, Bioaccumulative, and Toxic Chemicals, TSCA Section 6(h). (last updated 1/2025)

US EPA TSCA-PBT: <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/persistent-bioaccumulative-and-toxic-pbt-chemicals-under>

#### **7. US TSCA – Chemicals Under Evaluation by TSCA**

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

Contain

Do Not Contain

listed substances in the Persistent Organic Pollutant (EU POP) regulation (EU) 2019/2021 as updated on September 16, 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 hereby certifies that products processed and sold by CMC,

Contain

Do Not Contain

listed Per- and Polyfluoroalkyl substances by the US EPA. US EPA

PFAS: <https://www.epa.gov/pfas>

#### **10. Medium-Chain Chlorinated Paraffins (MCCP)**

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

Contain

Do Not Contain



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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 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 8/31/2023.

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

### **12. EU Medical Device Regulation (MDR)**

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

Contain

Do Not Contain

listed substances in the EU MDR, Annex VI, ATP22, section 10.4.1 in any concentration.

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

### **13. EU Ozone Regulation**

Combined Metals 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://ozone.unep.org/treaties/montreal-protocol/montreal-protocol-substances-deplete-ozone-layer>

### **14. IEC 62474 Declarable Substance List (DSL)**

Combined Metals hereby certifies that products manufactured by CMC,

Contain

Do Not Contain

substances on the IAEG Declarable Substance list of 8/7/2024.

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

### **15. IAEG Declarable Substance List (AD-DSL)**

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

Contain

Do Not Contain

substances on the AD-DSL list of June, 2024

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

### **16. Chemicals Prohibition Ordinance - ChemVerbotsV (Germany)**



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Combined Metals hereby certifies that products manufactured by CMC,

- Comply**
- Do Not Comply**

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

### **17. AltfahrzeughG - End-of-Life Vehicle Ordinance (Germany)**

Combined Metals hereby certifies that products manufactured by CMC,

- Comply**
- Do Not Comply**

AltfahrzeughG Ordinance - [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.bmuv.de/fileadmin/Daten\\_BMU/Download\\_PDF/Abfallwirtschaft/altfahrzeug-gesetz\\_en.pdf](chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.bmuv.de/fileadmin/Daten_BMU/Download_PDF/Abfallwirtschaft/altfahrzeug-gesetz_en.pdf)

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

Combined Metals hereby certifies that products manufactured by CMC,

- Comply**
- Do Not Comply**

Batteries Directive - <https://echa.europa.eu/understanding-batteries-regulation>

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

Combined Metals hereby certifies that products manufactured by CMC,

- Comply**
- Do Not Comply**

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

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

Combined Metals hereby certifies that packaging for the products,

- Comply**
- Contains but comply with thresholds & labeling**
- Do Not Comply**

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

### **21. Recycled Content**

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

- Pre-Consumer Content**
- Post-Consumer Recycled Content**
- Bio-based Content**



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**22. Global Automotive Declarable Substance List (GADSL)**

Combined Metals hereby certifies that products manufactured by CMC,

**Contain**

**Do Not Contain**

substances on the Global Automotive Declarable Substance List, revised 2025, <https://www.gadsl.org/>

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

Combined Metals hereby certifies that products processed by CMC,

**Contain**

**Do Not Contain**

substances on the EPCRA hazardous chemical list that require that a TRI Form R be submitted for each of the TRI listed chemicals in its products. EPCRA website: <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities#q1>

**24. Classification, Labelling and Packaging (CLP)**

Combined Metals 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 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.

<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 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>



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METALS COMPANY

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**27. Consumer Product Safety Improvement Act (CPSIA)**

Combined Metals 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 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>

For communications related to product compliance, please contact:

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