



January 24, 2012

RE: REACH COMPLIANCE- ULBRICH STAINLESS STEELS and SPECIAL METALS, INC.

To Whom it may concern:

Ulbrich Stainless Steel and Special Metals, Inc. provides customers with three core products - strip coil, wire and rods of custom shapes and profiles. We have reviewed the REACH Directive and various Guidance documents and have determined that our products are classified as Articles. In particular, Article 3 of REACH defines an Article as:

“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”.

Further, Appendix 3 Example 1-Metal Processing of ECHA's Guidance on Requirements for Substances in Articles, notes that sheets, coils, extrusion of metal are considered by REACH as Articles. Therefore, it is Ulbrich's opinion that we are not required to register our products under REACH; however we are aware of our potential Notification and Communication obligations. As such, we are monitoring ECHA for listings of SVHCs and will take appropriate actions as SVHCs are listed.

Additional requirements for suppliers of products to certain markets have been added for ingredients of concern specifically any of the following elements: Phthalates, DEHP, BPA or Animal Derived Ingredients. It is Ulbrich's position that none of our products contain Any of these elements and are in compliance with your specific requirements.

Ulbrich Stainless Steel and Special Metals, Inc's REACH contact is:

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If you any questions please do not hesitate to contact me at 203-265-8205.

Sincerely,

Ulbrich Stainless Steels and Special Metals, Inc

Gerard P. Goudreau