



# Compliance Statement

**EU RoHS • EU REACH & SVHC • Conflict Minerals • CA Prop 65**  
VMI Quality Management System

QMS05-L1-02

Revision Date:  
**7/24/2023**

Revision: 1.1

## Subject:

Vested Metals International, LLC **Compliance Statement** regarding the environmental directives/regulations:

- **EU RoHS,**
- **EU REACH/SVHC**
- **Conflict Minerals (Frank-Dodd Act)**
- **CA Prop 65**

## RoHS

Regarding the European Union Directives 2011/65/EU (RoHS2) & 2015/863/EU (RoHS3) – the restriction of the use of certain hazardous substances in electrical and electronic equipment:

- The content of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) or Diisobutyl phthalate (DIBP) in products supplied Vested Metals International, LLC do not exceed the maximum concentration values for such substances in homogenous materials of up to 0.01% by weight for cadmium and 0.1% for the other substances. The content of these substances in our products is negligible. Chromium is either negligible or not present in titanium.
- Products supplied by Vested Metals International, LLC are compliant with the European Union Directives 2011/65/EU (RoHS2) & 2015/863/EU (RoHS3).

For more information, visit:

[https://ec.europa.eu/environment/waste/rohs\\_eee/index\\_en.htm](https://ec.europa.eu/environment/waste/rohs_eee/index_en.htm)

## REACH & SVHC

Regarding the application of European Union Regulation (EC) No 1907/2006 (REACH) to our products and our intention to comply with the requirements. Vested Metals International, LLC can assure our customers that:

- All products supplied by Vested Metals International, LLC (e.g., bar, plate, sheet, including stainless, nickel, aluminum and titanium alloy) are considered articles under REACH. However, these articles have no intended release as outlined in the European Chemical Agency's 'Guidance on requirements for substances in articles' (RIP 3.8), and, therefore, Vested Metals International, LLC does not have any registration obligation under REACH for these articles.
- Products supplied by Vested Metals International, LLC do not contain any significant amounts of the chemical compounds on the current EU Candidate List of Substances of Very High Concern (SVHC) (as of February 1st, 2023) and the maximum concentration for such substances in homogenous materials does not exceed 0.1% by weight.
- Vested Metals International, LLC will continue to monitor the candidate list as it is updated.
- More information on Substances of Very High Concern can be found at the European Chemicals Agency's website, [echa.europa.eu](http://echa.europa.eu).

For more information, visit:

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



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## Conflict Minerals (Frank-Dodd Act)

Regarding the restriction of use of the “3TG Conflict Minerals” (tantalum, tin, tungsten, and gold) originating from the Democratic Republic of the Congo (aka DRC) and/or its “adjoining countries” as outlined in the Dodd-Frank Wall Street Reform and Consumer Protection Act - Section 1502... • Vested Metals International, LLC declares that none of its products contains and/or uses any of the 3TG’s and is in full compliance.

For more information, visit: [www.sec.gov/info/smallbus/secg/conflict-minerals-disclosure-small-entitycompliance-guide.htm](http://www.sec.gov/info/smallbus/secg/conflict-minerals-disclosure-small-entitycompliance-guide.htm)

## California Proposition 65

Proposition 65, officially known as the “Safe Drinking Water and Toxic Enforcement Act of 1986”, is a California statute that requires businesses to provide warnings to Californians about significant exposures to chemicals that can potentially cause cancer, birth defects, or other reproductive harm. These chemicals can be in the products that Californians purchase. By requiring that this information be provided, Proposition 65 enables Californians to make informed decisions about their exposure to these chemicals.

Regarding Vested Metals International, LLC compliance to California Proposition 65...

- Vested Metals International, LLC has reviewed California Proposition 65 and has determined that its products and/or operations does not contain and/or use any of the listed chemicals listed on the website ([www.p65warnings.ca.gov/chemicals](http://www.p65warnings.ca.gov/chemicals)) and does not pose any risk and/or is NOT likely to expose the people of California (or any other locale) to these chemicals.

For more information, visit:

<https://oehha.ca.gov/proposition-65>

## Please note:

Vested Metals International, LLC is a warehouse and distributor of domestic-sourced, raw stock titanium products and is not a manufacturer. All material supplied by Vested Metals International, LLC is DFARS Compliant.

The information provided in this statement regarding these environmental directives and/or regulations is based upon the data provided to us by the manufacturers and/or our suppliers of the material (i.e., material certifications, SDS, etc.) and Vested Metals International, LLC declares that, *to the best of our knowledge*, that this information is accurate and true.

Vested Metals International, LLC makes no representation, warranty, or guarantee of the accuracy of this information and in no event, shall our liability arising out of such misinformation, exceed the agreed upon purchase price of the Vested Metals International, LLC items sold to our customers.

Vested Metals International, LLC provides a copy of the original melt/manufacturer's material certification for each item of every order sold to our customers, and a copy of our company's Safety Data Sheet is available by request.

This information shall allow the customer to make any final determinations on compliance and/or whether to take further actions of these items with these (or any other) directives and/or regulations.

If you have any additional questions, please contact our Director of Quality, Daniel Brown by email at: [dbrown@vestedmetals.net](mailto:dbrown@vestedmetals.net)



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Reviewed by:	Daniel R. Brown	Approved by:	Viv Helwig
Signature:	<u>Daniel Brown</u> <small>Daniel Brown (Jul 24, 2023 13:42 EDT)</small>	Signature:	
Date:	Jul 24, 2023	Date:	Jul 24, 2023

**Revision Table**

Date:	Description of change:	Reviewer	Approver	Revision #:
3/1/2023	New document to combine EU RoHS; EU REACH & SVHC – Conflict Minerals and CA Prop 65.	Director of Quality	President	1.0
7/24/2023	Included “aluminum” into articles to clarify substances under REACH definition.	Director of Quality	President	1.1







# QMS05-L1-02 VMI COMPLIANCE STATEMENT

Final Audit Report

2023-07-24

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