



JSW Steel USA

January 1, 2025

**Re: JSW Steel USA Product Stewardship Declarations
Melted & Manufactured Carbon Steel Products**

To Whom it May Concern:

JSW Steel (USA) Inc. and JSW Steel USA Ohio, Inc. (collectively “JSW Steel USA”) has completed a detailed technical analysis of the raw materials, intermediate products, and production processes related to the melting and manufacturing of carbon steel products at its Mingo Junction, Ohio, and Baytown, Texas operating locations in the context of product stewardship. The carbon steel products manufactured by JSW Steel USA include slabs, coils, plates, and pipe and any associated coatings that may be applied. Specifically, the product stewardship reviews included a regulatory analysis to determine whether the carbon steel products that JSW Steel USA manufactures contain substances / ingredients that are:

- Listed as carcinogenic or a reproductive toxin under California’s Safe Drinking Water and Toxic Enforcement Act of 1986 (**Proposition 65**),
- Substances/ingredients subject to reporting under the Conflict Minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 via CMRT v6.01 (**Conflict Minerals**),
- Listed as Substances of Very High Concern (SVHC) published in accordance with Article 59(10) of EU Regulation (EC) 2006/1907 as currently amended (**EU REACH SVCH**)
- Regulated under EU Directive 2015/863 (**RoHS 3**), or
- Chemical compounds listed in United States Toxic Substances Control Act (**TSCA**), Section 6(h) regarding chemicals that are Persistent, Bio-accumulative and Toxic (**PBT**).

As a result of the product stewardship review, the following declarations can be made:

California Proposition 65 (Safe Drinking Water & Toxic Enforcement Act)

California Proposition 65, also known as the “Safe Drinking Water and Toxic Enforcement Act of 1986”, is a list of chemical substances developed by the State of California, which are known to the State to cause cancer or reproductive toxicity. This list was generated under the requirements of the State’s Safe Drinking Water and Toxic Enforcement Act of 1986. Based on the criteria set forth under California’s Proposition 65. Processing of products produced by JSW Steel USA can result in exposure to chemicals including the following:

- Quartz Silica
- Arsenic
- Lead
- Nickel
- Crystalline silica
- Hexavalent chromium compounds

Conflict Minerals / Dodd-Frank Wall Street Reform and Consumer Protection Act

The law known as H.R. 4173, the Dodd-Frank Wall Street Reform and Consumer Protection Act, was signed into law on July 21, 2010, which contains an obscure provision related to conflict minerals. Conflict minerals are defined to mean, “(A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives. While our products have not been chemically analyzed for the minerals columbite-tantalite (coltan), cassiterite, gold and wolframite or their derivatives, they are not anticipated to be present in our products. They are not intentionally added and, to the best of our knowledge, are not present in the raw materials used to make our products.

REACH / SVHC (substances of Very High Concern)

None of the substances listed in the ECHA Candidate List of Substances of Very High Concern, updated on November 7, 2024, are intentionally used in the formulation or during the manufacturing process of above-mentioned product in a content > 0,1%. Furthermore, none of the substances listed in the recent version of Annex XIV of Regulation EC 1907/2006 are intentionally used in the formulation or during the manufacturing process of this product. None of the substances listed in the recent version of Annex XVII of Regulation EC 1907/2006 are intentionally used in the formulation or during the manufacturing process of this product.

Radiation

The products shipped by JSW Steel USA does not utilize radioactive raw materials and is not subject to radiation by JSW Steel USA or the raw materials suppliers.

RoHS

This product complies with the requirements of Article 4.1 of EU Directive 2011/65/EU (RoHS 2), as amended (Directive (EU) 2015/863 inclusive) (RoHS 3).

Toxic Substances Control Act (TSCA), Section 6(h)

The United States Toxic Substances Control Act (TSCA), Section 6(h), outlines certain chemicals that are designated as Persistent, Bio-accumulative, and Toxic (PBT) due to their hazardous effects on human health and the environment. Under Section 6(h), the Environmental Protection Agency (EPA) targets these chemicals (Decabromodiphenyl ether, Phenol, isopropylated phosphate, 2,4,6-Tris(tert-butyl) phenol, Hexachlorobutadiene and Pentachlorothiophenol) for risk management to reduce or restrict their use. JSW products do not use any of the five (5) chemicals designated under TSCA Section 6(h) as PBT.