

November 3, 2021

Subject: REACH Legislation EC 1907/2006  
REACH Annex XIV  
REACH Annex XVII  
REACH Candidate List

To Whom It May Concern:

The European Chemicals Agency ("ECHA") prioritizes substances of very high concern ("SVHC") from the Candidate List ("REACH Candidate List") to determine which substances should be included in the Authorization List Annex XIV ("REACH Authorization List"). These substances cannot be placed on the market or used after a given date unless an authorization is granted for their specific use. The Authorization List ("REACH Annex XIV") is regularly updated with substances from the Candidate List (which itself is regularly updated). Restrictions on substances, mixtures or articles are set out in the Restricted Substance List Annex XVII ("REACH Restricted Substance List") and the REACH Restricted Substance List refers to the conditions attached to the substance restrictions.

Once a substance is included on the Candidate List, it creates certain legal obligations for the European Union ("EU") importers, producers, and suppliers of an article that contains such a substance. REACH defines an "article" as an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition. The steel products supplied to your company by Cleveland-Cliffs Steel LLC or Cleveland-Cliffs Steel Corporation (collectively, "Cleveland-Cliffs Steel") are considered articles consistent with REACH definitions.

EU/EEA manufacturers or importers of an article which contain a SVHC (i.e., is on the Candidate List or the Authorization List):

- in quantities of 1 tonne or more per year (tonnage of the SVHC not the article); and
- the concentration of the SVHC in the relevant part of the article is above 0.1% weight by weight (w/w)

are required to make a notification to ECHA unless the substance has already been registered for that specific use.

As of the date of this letter the steel products we deliver contain no SVHC above the current REACH notification thresholds. We monitor the Candidate List of SVHC and will inform our customers in the event any changes to the requirements include a substance contained in our steel products.

Under REACH guidelines, a North American company that exports product to the EU is not obligated by REACH to register or make notifications itself as REACH only obligates EU based companies or nominated EU representatives of the non-EU exporter. REACH obligations for non-EU exporters must therefore be fulfilled by the EU importers or by an EU appointed representative. Consequently, the registration or notification with ECHA of a substance covered by REACH is not the responsibility of Cleveland-Cliffs Steel.

The information in this letter is provided for the general information of customers and does not imply any warranty. The interpretation or use of this information is the sole responsibility of the user. This information is provided to you on the following conditions: (1) Cleveland-Cliffs Steel makes no representations or warranties as to any tests used in preparing this letter or correctness of its contents; (2) Cleveland-Cliffs Steel shall not be liable to you or any other person for the performance, merchantability, suitability or fitness for any purpose of any material or item tested or investigated in the preparation of this letter, whether such liability is asserted on the basis of express or implied representations, warranties or conditions, in contract or tort, by statute or common law, or on any other basis; and, (3) you agree to hold Cleveland-Cliffs Steel harmless against any liability that may be imposed on it in connection with this letter, the manufacture of any item in reliance on it, the use of any item so manufactured or the breach of any of these conditions.

Should you have any questions or require further information, please contact the undersigned at [evelyn.hoffman@clevelandcliffs.com](mailto:evelyn.hoffman@clevelandcliffs.com).

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