



## **Company Policies for Compliance with Domestic and International Environmental and Material Directives- Revision 11-Dec-18**

### **Policy For DFARS Compliance**

Regarding Precision Fittings' policy for compliance with Defense Federal Acquisition Regulation Supplement (DFARS) 252.225-7014, Preference for Domestic Specialty Metals.

In agreement with the intention of these regulations, whenever possible Precision Fittings purchases materials falling under the Specialty Metals category from distributors who represent domestic U. S. mills or who procure from qualifying countries under "Alternate I" (Apr 2003 or subsequent issues.)

When Manufacturing orders are initiated to fill requirements for a specific customer who has requested DFARS compliance, only compliant materials are used in accordance with contract requirements.

Precision Fittings also manufactures military and commercial standard pipe plugs for stock and distribution, and qualifying materials are not always available in the necessary alloys and sizes when schedules allow production. In these cases, Precision Fittings offers some items made of materials that originate from countries not included in the qualifying countries list in DFAR 225.872-1. When manufactured this way, products can be sold if DFARS 252.225-7104 is not a requirement or when the requirement can be waived.

Revision History: Issued 23 March 2007; Reaffirmed November 12, 2013

### **Policy For RoHS Compliance**

Regarding Precision Fittings' policy for compliance with restriction of hazardous substances per EU Directives 2002/95/EC and 2015/863/EU (RoHS 3.)

All of the uncoated catalog pipe plug items we offer are made to SAE or ASME/ANSI standards, and are made of materials that do not contain the substances restricted by the RoHS directives. We manufacture some products to customer designs that specify cadmium plating or zinc with yellow chromate coating. For those products, we use the customer-specified materials and coatings, which may not meet EU directives.

If customers require supplemental coatings and request them to comply with RoHS, then we arrange with our subcontract sources to apply compliant coatings. For products ordered with clear zinc plating, our plating subcontractor has been using RoHS compliant plating since 2004.

Since we do not design products, we rely on our customers to inform us when material or coating specification requirements are changed, whether customer-initiated or to comply with changing regulations that affect their markets.



We hope this information is sufficient. If something else is needed, please contact the quality department at 440-647-4143, or e-mail sales@precisionfittings.com.

Best regards,

Richard Ross  
QA Engineer

Directive 2002/95/EC and Directive 2015/863/EU requirements:

The restriction of the use of certain hazardous substances	Abbreviation	The maximum concentration value <sup>1</sup>	Lead as an alloying element in steel containing up to %	Lead as an alloying element in Aluminum containing up to %	Lead as an alloying element in Copper containing up to %
Lead	Pb	0.1	0.35	0.4	4.0
Mercury	Hg	0.1	N/A	N/A	N/A
Cadmium	Cd	0.01	N/A	N/A	N/A
Hexavalent Chromium	CrVI	0.1	N/A	N/A	N/A
Polybrominated diphenyl ethers	PBDE	0.1	N/A	N/A	N/A
Polybrominated diphenyl	PBB	0.1	N/A	N/A	N/A
(Bis(2-Ethylhexyl) phthalate	DEHP	0.1	N/A	N/A	N/A
Benzyl butyl phthalate	BBP	0.1	N/A	N/A	N/A
Dibutyl phthalate	DBP	0.1	N/A	N/A	N/A
Diisobutyl phthalate	DIBP	0.1	N/A	N/A	N/A

<sup>1</sup>All limits are in percentage of weight.

In case of surface treatments, the weight refers to the weight of the surface treatment material.

**Policy for REACH Compliance:** Revision 04Jun2014

Regarding Precision Fittings' policy for compliance with REACH, (Registration, evaluation, Authorisation and Restriction of Chemicals,) per (EC) N. 1907/2006:

All of the uncoated catalog pipe plug items we offer are made to SAE or ASME/ANSI standards, and are made of materials that do not contain the substances restricted by REACH regulations (SVHC.)

When plating or coatings are applied, they are considered as finishes integral to the function of the part and not intended to be released into the air, ground or water.

When requested by customers, we supply declarations listing the most recent SVHC's and affirming that none are present in the products being supplied.

Since we do not design products, we rely on our customers to inform us when material or coating specification requirements are changed, whether customer-initiated or to comply with changing regulations that affect their markets.



## Policy For Conflict Minerals Compliance

Regarding Precision Fittings' policy for compliance with the August 22, 2012 Securities and Exchange Commission ruling mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act:

As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, H.R 4173, Section 1502(e)(4):

CONFLICT MINERAL.—The term “conflict mineral” means—  
(A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or  
(B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.  
(available at <http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>)

Precision Fittings is not required to report to the SEC. None of our products require for manufacturing, or intentionally contain any tantalum, gold or tungsten. Use of any of the specified material derivatives is limited to tin plating, which is subcontracted.

To ensure continuing compliance, Precision Fittings periodically affirms with our subcontractor(s) that the source of their tin is not from the Republic of the Congo of its adjoining countries.

Revisions:

02 Nov 2012 – Issued

12 Feb 2013 – Added definition sub-paragraph

10 Oct 2014 – Added that products do not contain Tantalum, Gold or Tungsten

## Policy For Compliance With California Proposition 65

Regarding Precision Fittings' policy for compliance with the State of California Safe Drinking Water and Toxic Enforcement Act of 1986, known as Proposition 65:

Proposition 65 requires the State of California to publish annually, a list of chemicals known to cause cancer or birth defects or other reproductive harm. Businesses are required to notify Californians about significant amounts of chemicals in the products they purchase, in their homes or workplaces, or that are released into the environment.

When they are available, current lists of chemicals published under Proposition 65 are reviewed with our suppliers to ensure compliance is maintained. Currently, nickel, a material used in stainless steel is listed as a reportable substance. Where customers require labeling of reportable substances, Precision Fittings Sales works with customers and manufacturing to determine if labeling requirements can be met and assists in making arrangements with Shipping to obtain and apply labels as required.