

January 3, 2023

<u>NUCOR CORPORATION</u> Statement on Defense Acquisition Regulations System, Department of Defense, Minimizing the Use of Hexavalent Chromium

NUCOR STEEL PRODUCT STATEMENT

Nucor steel merchant bar & rebar, cold finished steel bar, engineered bar, structural steel, carbon steel plate and sheet steel products including galvanized and galvannealed sheet products meet the U.S. Department of Defense (DoD), Defense Federal Acquisition Regulation Supplement (DFARS) policy memorandum of April 8, 2009, "Minimizing the Use of Hexavalent Chromium" as codified at 48 C.F.R. § 223.7301, and contain no more than 0.1 percent hexavalent chromium by weight.

DFARS Compliance Analysis

DFARS prohibits deliverable or construction material containing more than 0.1 percent hexavalent chromium by weight in any *homogeneous* material where proven substitutes are available that provide acceptable performance for the application. 48 C.F.R. § 223.7303(a). 48 C.F.R. § 252.223-7008 defines a "homogeneous material" as a material that cannot be mechanically disjointed into different materials and is of uniform composition throughout. Examples of homogeneous materials include individual types of plastics, ceramics, glass, metals, alloys, paper, board, resins, and surface coatings. Homogeneous material does not include conversion coatings that chemically modify the substrate. "Mechanically disjointed" means that the materials can, in principle, be separated by mechanical actions such as unscrewing, cutting, crushing, grinding, and abrasive processes.

Galvanized/galvannealed coatings applied to Nucor sheet steel product is a conversion coating that chemically modifies the steel substrate; thus, Nucor galvanized/galvannealed coated sheet steel is a homogeneous material for purposes of DFARS. All Nucor galvanized/galvannealed sheet steel products contain no more than 0.1% hexavalent chromium by weight.

Limitations of Nucor Product Statement

Nucor's certification only covers substrate steel manufactured by Nucor and any coating that Nucor subsequently applies to its substrate steel. This certification does not extend to any coating applied to a Nucor product by a customer, reseller or other third party.

If you need additional information on a specific Nucor steel product, please contact:

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