NEXUS

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MATERIAL COMPLIANCE STATEMENT.

CONFLICT MINERALS · ROHS · REACH · ORIGIN

DOC NO.	VERSION	STATUS
NXS-MCS	1.0 · 2026	Draft for review

This statement describes how Nexus Industrial Group addresses material content and sourcing requirements for the Goods it supplies. Product-specific declarations depend on the manufacturer or mill and are issued on request for a stated part number, heat, or lot.

01
SECTION

SCOPE

This statement applies to steel, alloys, manufactured parts, and other Goods supplied by Nexus. Nexus is a distributor and contract manufacturer and relies on declarations from its mills, manufacturers, and sub-tier suppliers. Nexus requires those suppliers to provide accurate information under the Nexus Purchase Order Terms (NXS-LEGAL-POT) and Supplier Code of Conduct (NXS-SCOC).

02
SECTION

CONFLICT MINERALS

Nexus supports the goals of Section 1502 of the Dodd-Frank Act and the OECD Due Diligence Guidance for responsible mineral supply chains. Nexus does not knowingly source tin, tantalum, tungsten, or gold (3TG) that directly or indirectly finances armed groups in the Democratic Republic of the Congo or adjoining countries.

Nexus asks suppliers of Goods that may contain 3TG to complete the Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT), and cobalt and mica through the Extended Minerals Reporting Template (EMRT). Nexus provides a compiled CMRT or EMRT for specific Goods on request.

03

SECTION

ROHS

For Goods within the scope of EU Directive 2011/65/EU as amended (RoHS), Nexus provides manufacturer declarations of conformity with the substance restrictions on request. Most structural steel and raw metal products fall outside RoHS scope. Nexus will state this where it applies.

04

SECTION

REACH

For Goods supplied into the European Union, Nexus requests information from its suppliers on substances of very high concern (SVHC) on the REACH Candidate List above 0.1% weight by weight, as required by Article 33 of Regulation (EC) No 1907/2006. Nexus passes this information to customers on request.

05

SECTION

CALIFORNIA PROPOSITION 65

Some metal products, including steel and alloys, may contain substances such as nickel, chromium, or lead that are listed under California Proposition 65. Where required, Nexus provides warnings with Goods shipped to California.

06

SECTION

COUNTRY OF ORIGIN

Nexus reports the country of melt and pour and country of manufacture for steel products where available, and the country of origin for other Goods, as stated on mill test reports or manufacturer documentation. Nexus can support Buy America, Buy American, and USMCA origin requirements when they are specified on the order and the qualifying source is available.

07

SECTION

REQUESTING A DECLARATION

Customers may request a product-specific declaration using the fields below. Nexus will respond within ten (10) business days, or tell you if more time is needed to obtain information from the supplier.

COMPANY · CONTACT	
EMAIL	
NEXUS ORDER OR QUOTE NO.	
PART NO. · HEAT · LOT	

DECLARATION NEEDED	☐ CMRT ☐ EMRT ☐ RoHS ☐ REACH SVHC ☐ Prop 65 ☐ Country of origin ☐ Buy America / USMCA

LIMITATION

This statement reflects information available to Nexus from its suppliers and is provided in good faith. It is not a warranty. Product warranties are stated in the Nexus Terms and Conditions of Sale (NXS-LEGAL-TCS).