

**US-Mexico-Canada Agreement  
Country of Origin Certification**

This Country of Origin Certification (Certification) is being provided to comply with the US-Mexico-Canada Agreement (USMCA), applicable laws and regulations of the United States (US), and to facilitate the documentation requirements of the US Customs and Border Patrol (CBP).

**Certification Information**

1. Hanna Steel Corporation is the Certification party and producer of the goods specified in Section 4 below.
  - a. Location: 4527 Southlake Parkway, Hoover, Alabama 35244.
  - a. Tax Identification Number: 63-0353411
  - b. Authorized Signatory: Randy Raiford, Chief Financial Officer
  - c. Primary Telephone Number: 205-820-5200, Primary Email: [rraiford@hannasteel.com](mailto:rraiford@hannasteel.com)
2. Exporter: Various
3. Blanket Period: January 1, 2022 – December 31, 2022
4. This Certification pertains to the following specified goods:


| General Description of Goods                                                                                       | HS Tariff Classification Number | Criterion | Producer | Net Cost | Country of Design |
|--------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------|----------|----------|-------------------|
| Hot-rolled products of iron or nonalloy steel, of width of Less than 600 mm, not clad, plated or coated. (pickled) | 7211.19.60                      | C         | YES      | NO       | USA               |
| Flat-Rolled products of iron or nonalloy steel, of width of less than 600 mm, painted.                             | 7212.40                         | C         | YES      | NO       | USA               |
| Welded steel mechanical tubing of circular cross section. (nonalloy)                                               | 7306.30                         | C         | YES      | NO       | USA               |
| Welded steel mechanical tubing of non-circular cross section. (nonalloy)                                           | 7306.61                         | C         | YES      | NO       | USA               |

**Certification**

Hanna Steel, through its Authorized Official, Randy Raiford, hereby acknowledges the requirements of the USMCA and applicable US laws and regulations and represents and warrants the information provided herein to be true and accurate as of the date of this Certification.

I certify that the goods described in this document qualify as originating and the information contained in this document is true and accurate. I assume responsibility for providing such representations and agree to maintain and present upon request or to make available during a verification visit, documentation necessary to support this certification.

Hanna Steel Corporation

By:   
Randy Raiford, Chief Financial Officer, Authorized Officer  
November 1, 2021  
Date of Certification

## General Guidance for Certification

Pursuant to the USMCA and applicable US law, Certificates of Origin (CoO) must be preserved for record and reporting, and provided to CBP upon request. The USMCA and enabling US regulations permit that CoOs may be provided in various ways, including statements, invoices any other documents. Section 202 of the USMCA Implementation Act specifies the rules of origin (RoO) used to determine whether a good qualifies as an originating good under the Agreement. Additionally, the Harmonized Tariff System – US (HTSUS) also includes rules of origin, definitions, and other related provisions. In general, a good is originating when:

- A good is wholly obtained or produced entirely in a USMCA country;
- A good is produced entirely in the territory of one or more of the USMCA countries using non-originating materials provided the good satisfies all applicable requirements of product-specific rules of origin;
- A good is produced entirely in the territory of one or more of the USMCA countries exclusively from originating materials; or
- Except for a good provided for in HTSUS Chapter 61 to 63, the good is produced entirely in the territory of one or more of the USMCA countries, is classified with its materials or satisfies the “unassembled goods” requirement, and meets a regional value content threshold of not less than 60% if the transaction value method is used or not less than 50% if the net cost method is used (not including RVC for autos); and
- A good satisfies all other applicable origin requirements.

Wholly obtained goods. A good is originating in a USMCA country if the good is:

- a mineral good or other naturally occurring substance extracted from one or more of the USMCA countries;
- waste and scrap derived from production in one or more of the USMCA countries, or
- used goods collected in one or more of the USMCA countries, provided the goods are fit only for the recovery of raw materials; or
- a good produced in one or more of the USMCA countries, exclusively from a good meeting the other RoO requirements, or from their derivatives, at any stage of production.

Goods produced from non-originating materials. A good, produced entirely in the territory of one or more of the USMCA countries, is originating in a USMCA country if each of the non-originating materials used in the production of the good satisfies all applicable requirements of RoO rule.

Goods produced exclusively from originating materials. A good is originating in a USMCA country if the good is produced entirely in one or more of the USMCA countries exclusively from originating materials and the good satisfies all other applicable RoO rules.