

Appleton Group

Appleton Grp LLC
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**BUY AMERICAN PROVISIONS OF ARRA SECTION 1605**

DATE: April 16, 2019

The following products (on the attached page) were manufactured in one of Appleton Group's US facilities located in Stephenville, TX, Houston, TX, Rainsville, AL, or East Granby, CT.

As manufacture and substantial transformation of the products occurred in the United States, these products comply with the Buy American Provisions of the American Recovery and Reinvestment Act (Section 1605).

Question for Determining Whether Substantial Transformation Has Occurred in the U.S.		
QUESTION	YES	NO
1. Were all of the components of the manufactured good manufactured in the United States, and were all of the components assembled into the final product in the U.S.? (If the answer is yes, then this is clearly manufactured in the U.S. and the inquiry is complete)		X
2. Was there a change in character or use of the good or the components in America? (these questions are asked about the finished good as a whole, not about each individual component)	X	
a. Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good?	X	
b. Did the manufacturing or processing operation result in a change of a product(s) with one use into a product with a different use?	X	
c. Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multi-use product?	X	
3. Were the processes performed in the U.S. (including but not limited to assembly) complex and meaningful?	X	
a. Did the processes take a substantial amount of time?	X	
b. Were the processes costly?	X	
c. Did the processes require particular high level skills?	X	
d. Did the processes require a number of different operations?	X	
e. Was substantial value added in the processes?	X	

Regards,

Darren Lenox
 Director of Trade Compliance
 Appleton Group

NOTE: ARRA eligibility is subject to change without notice.

Certificate of Compliance

Buy American requirements of the American Recovery and Reinvestment Act of 2009

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4SSLEK**Description**CVR 4X2-1/8 TGL SW
BX HNDY 4X2-1/8 2-1/8 DP WELDE**Compliance Code**USA
USA