

MANUFACTURED GOODS/SUBSTANTIAL TRANSFORMATION
BUY AMERICAN PROVISIONS OF ARRA SECTION 1605

DATE: May 25, 2023

IRON/ALUMINUM

Appleton Group has an Iron and Aluminum Foundry located in South Milwaukee, WI. The iron or aluminum for the products listed on the attached page were cast in this facility.

STEEL

Appleton Group has a manufacturing plant located in Stephenville, TX. Steel Box products listed on the attached page were stamped in this facility from US steel.

SUBSTANTIAL TRANSFORMATION

While the finishing and minor assembly was performed in our Mexico facility, substantial transformation of the product occurred during the casting or stamping process in the United States as demonstrated in the questionnaire below.

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	

Question for Determining Whether Substantial Transformation Has Occurred in the U.S.

QUESTION	YES	NO
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	

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

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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APPLETON GROUP CATALOG NUMBER

DESCRIPTION

COMPLIANCE CODE

EC50

1/2 IN 3 PIECE UNION

Substantial Transformation

EC75

3/4 IN 3 PIECE UNION

Substantial Transformation



EASYHEAT

NELSON

OZGEDNEY

SOLAHD

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EasyHeat, Inc. is a wholly owned subsidiary of Appleton Grp LLC.