

February 12, 2025



This memo certifies that all Whitegoods products featuring the BAA / BABA logo are in compliance with both the Buy America Act and the Build America, Buy America Act.

BUY AMERICA ACT (BAA):

The Buy America Act (BAA) requires that federal agencies use domestic products and construction materials for certain projects.

BAA Requirements:

- Manufactured products must be manufactured in the United States and have more than 65% of their components mined, produced, or manufactured in the United States.

Whitegoods products comply with BAA:

- Final point of assembly and testing is the Inter-lux factory in Baltimore, MD.
- Housings and gear trays are produced from partially-recycled aluminum by companies located in the USA. All miscellaneous hardware is either aluminum or stainless steel. All paint finishing is applied in the USA.
- Machined-aluminum parts are from US producers, while cast-aluminum parts are sourced worldwide. Both represent less than 3% of the total cost of the product.
- LEDs, LED Drivers, and related electronic components are sourced worldwide as there is limited manufacturing of comparable components taking place within the USA.

BUILD AMERICA, BUY AMERICA ACT (BABA):

The Build America, Buy America Act (BABA) requires that certain materials used in federally-funded infrastructure projects are produced in the United States. The act applies to iron, steel, manufactured products, and construction materials.

BABA Requirements:

- All iron and steel used in the project must be produced in the United States.
- All manufactured products used in the project must be produced in the United States.
- The cost of components of manufactured products that are produced in the United States must be greater than 55% of the total cost.
- All construction materials used in the project must be produced in the United States.

Whitegoods products comply with BABA:

- Extruded Aluminum manufactured construction materials primarily used for housing or enclosures in fixtures contributes to the manufactured product's compliance.
- PCB Boards made in the USA are considered part of the manufactured product (electronics fall under this category).
- Acrylic Lenses are typically classified as plastic/polymer-based construction material, which is covered under BABA.