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EU Declaration of Conformity

pursuant to Article 39 and Annex VIII of Regulation (EU) 2025/40 (PPWR) Markmann Oberflächentechnik GmbH

Document ID: Markmann-Oberflächentechnik-PPWR-DoC-001 • **Revision:** 1.1 • **Last updated:** Salzgitter, 14/08/2026

Dear Sir or Madam,

We are pleased to provide you with an overview of the current status regarding EU Regulation (EU) 2025/40 on packaging and packaging waste (PPWR), which enters into force on 12/08/2026. Individual additional requirements will enter into force gradually up to 2040. At the same time, the existing Packaging Directive 94/62/EC will be gradually replaced. The regulation applies to all packaging, including packaging-related components throughout the entire supply chain.

1. Applicability to our products

As an authorised converter of abrasives and adhesive and occupational safety products, we define ourselves as the producer/placer on the market (Annex VIII Nos. 2+3). For all other packaging and packaging products where Markmann Oberflächentechnik GmbH does not act as the producer (contract manufacturing/supplier), **general duties of care/information apply**. This means that we have checked whether our upstream suppliers comply with their obligations pursuant to Articles 5-12 of PPWR 2025/40 and maintain separate documentation for this purpose.

2. Product changes/reformulations

At present, we have received no information from our raw material or upstream suppliers regarding changes to the packaging products we purchase (changes to ingredients). Following completion of the conformity assessment, we will inform our customers of additions/changes to the Declaration of Conformity through our information service.

3. Subject matter of the declaration (Annex VIII No. 4)

All packaging articles referred to here, together with the relevant packaging components, have been assessed as harmonised as part of the conformity assessment: cardboard packaging, cardboard cores and tubes, plastic cores and tubes, closure/adhesive tape, shipping label, filling material, kraft paper, PE product overpackaging, delivery note pouch, PET strapping (2030) and stretch film (2030). All items mentioned are intended for single use without direct contact with food. The exception is the wooden pallets, with regard to their reusability.



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4. PPWR conformity pursuant to Art. 39

A significant new feature of the PPWR is the obligation to prepare Declarations of Conformity for packaging, including packaging-related components, from 12/08/2026.

The Declaration of Conformity is based on technical documentation and upstream supplier declarations and includes, among other things, compliance with the following requirements:

- Limitation of substances of very high concern (SVHCs pursuant to the REACH Candidate List) to below 0.1%
- Compliance with the restrictions according to REACH Annex XVII
- Limit values for lead, cadmium, mercury and chromium VI (total content < 100 mg/kg) (PPWR Art. 5)
- PFAS limits for packaging intended to come into contact with food (PPWR Art. 5)

In accordance with Article 5 of the PPWR Regulation, we confirm that the product packaging placed on the market by us, including the relevant packaging components, demonstrably complies with the applicable requirements.

5. Standards and specifications applied (Annex VIII No. 6)

Fully applied standards: PPWR 2025/40 Articles 5, 6, 10, 11 and 12 (Module A, Annex VII)

SVHCs pursuant to the REACH Candidate List

6. Sustainability requirements applied (Annex VIII No. 5)

	<u>Status:</u>
Art. 5 Heavy metals: $\sum (Pb + Cd + Hg + CrVI) \leq 100\text{mg/kg}$ per component	compliant
PFAS limits – only for contact with food	not applicable
Art. 6 Design for recycling	compliant
Art. 7 Minimum recycled content of plastic packaging	from 2030
Art. 8 Bio-based plastics pursuant to Directive (EU) 2018/2001	from 12/02/2028
Art. 9 Compostability	from 12/02/2028
Art. 10 Packaging minimisation	compliant
Art. 11 Reusability (only reusable packaging)	not applicable
Art. 12 Labelling (material codes, HS label)	compliant

Note on exceptions and non-applicability

Individual product-specific components of composite products cannot always be provided, as the respective component accounts for less than 5% of the total weight per packaging unit.



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7. Involvement of a notified body (Annex VII No. 7)

Not applicable, conformity assessment according to Module A

8. General information

We will communicate any changes to this Declaration of Conformity resulting from the gradual expansion of the requirements in good time.

If you have any questions, please use the email address below.

compliance@markmann.de

We hope that this has been helpful to you and are happy to answer any questions you may have.

Kind regards,



Petros Karatzovalis
Management Director
Markmann Oberflächentechnik GmbH



Karsten Garn
Head of Contract Manufacturing
Markmann Oberflächentechnik GmbH



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