

## DECLARATION OF CONFORMITY

This declaration is the sole responsibility of VPK.

This declaration applies to all solid cardboard packaging (production code Sxxx...), unprinted and printed, including printed on the inside, in specific cases with an additional polyethylene layer or a polypropylene window, intended for the packaging of foodstuffs, produced at the VPK Group sites listed below (hereinafter referred to as 'Packaging'). Solid cardboard products are marketed under the brand name 'Smart Packaging Solutions' (SPS).

### The production sites

Smart Packaging Solutions Dendermonde  
Oude Baan 120, 9200 Dendermonde, Belgium.

Smart Packaging Solutions Meer  
Europastraat 28, 2321 Meer, Belgium.

Smart Packaging Solutions Loenen  
Voorsterweg 38, 7371 GC Loenen, Netherlands.

### Chapter I: Declaration

Smart Packaging Solutions declares that all Packaging complies with the applicable regulations and recommendations as stated in chapter II of this Declaration of Conformity.

The packaging may come into direct contact with dry, non-greasy or permanently deep-frozen food and foodstuffs that need to be peeled, shelled or washed before consumption (fresh produce). Indirectly, all foodstuffs may be packaged in all Packaging, provided that suitable primary packaging is used as a buffer. If a modified liner is used as an inner liner or a suitable coating is applied to the inner liner, direct contact with greasy foodstuffs is possible. For example, the PE layer in specifically selected liners is suitable for direct contact with dry, moist, acidic, frozen and greasy food. Use for other purposes falls outside the scope of this Declaration of Conformity. This declaration does not imply any guarantee of suitability for a specific commercial purpose or use outside the specified context.

This statement applies only insofar as the Packaging is used correctly, which implies the following:

- When storing for use, protect from moisture and extreme temperatures (recommendation: between 30 and 70% RH and +5 and +25°C). If possible, use the packaging within six months of the production date. Only use for its intended purpose and in accordance with the following restrictions.
  - shock freezing can be done at -45°C;
  - storage in cold rooms can be done at -25°C;
  - never defrost in packaging;
  - never use in hot preparations.

### Chapter II: Argumentation and Documentation

II. A. All liners comply with the requirements and recommendations regarding purity, migration and organoleptic integrity as laid down in:

- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC, Current consolidated version: 27/03/2021;
- Belgian Royal Decree of 11 May 1992 on materials and articles intended to come into contact with foodstuffs (total migration in all types of paper is < 60 mg per 6 dm<sup>2</sup>/kg of food);
- Duitse BfR (Bundesinstitut für Risikobewertung) aanbeveling XXXVI. "Paper and board for food contact", version: 01/02/2023;
- Dutch Commodities Act regulations on packaging and consumer goods, version: 12/07/2025
- For board grades cartons with a PE coating (low-density polyethylene LDPE) and polypropylene windows (biaxially oriented polypropylene BOPP): Commission Regulation (EU) No 10/2011 of 14 January 2011 on materials and

articles intended to come into contact with food, consolidated version of 31/08/2023 and Articles 3, 11(5), 15 and 17 of Regulation (EC) No 1935/2004, consolidated version of 27/03/2021.

II. B. The composition of the raw materials from recycled paper complies with and is communicated in accordance with standard NBN EN 643 (2014). The ratios between industrial and post-consumer sources are known.

### Chapter III: Analyses

Every two years, the following targeted analyses are carried out in external, ISO 17025 accredited laboratories:

- specific migration tests on all standard paper types, with extra attention to current points of interest;
- specific tests on representative blank cardboard
- migration tests linked to printing on representative 100% printed cardboard, printing on the outside ...and/or on the inside;
- LDPE is tested at the suppliers in accordance with EN 1186, EN 13130 and CEN/TS 14234 and 14235. The choice of simulants and contact conditions are in accordance with Annex III and V of Regulation (EU) No 10/2011.

All results confirm that there are no objections to using these materials as described in chapter I of this Declaration of Conformity..

All suppliers of raw materials, as well as suppliers of relevant auxiliary materials, are systematically requested to provide all available documents relating to their position on food safety and traceability. All reports and documents are provided on request. In a B2B context, Smart Packaging Solutions accepts no liability for damage resulting from incorrect or incomplete information provided by these third parties, insofar as this does not conflict with mandatory legal provisions..

### Chapter IV: Additives

SMART Packaging Solutions and the suppliers do not use Bisphenol A in the production of Packaging and thus complies with French 'Law No. 2010-729 of 30 June 2010, amended by Law No. 2012-1442 of 24 December 2012' and Constitutional Council Decision No. 2015-480 of 17 September 2015.

The following substances are also not used or added anywhere in the processes by VPK Packaging NV:

- anthraquinone, phthalates, TOF, PFAS, PFOA, PFOS, PFNA, PFHxS, LC-PFCAs, mineral oils;
- active and/or intelligent materials;
- substances that are only permitted behind a functional barrier in paper and cardboard.

The inks comply with the requirements set out in the French Loi AGECE, l'arrêté du 13 avril 2022.

### Chapter V: Certificatie

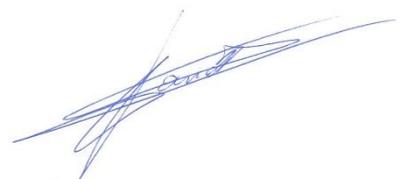
The above-mentioned production sites have been certified to BRC/IOP since 2005 and BRC Global Standard Packaging Materials since April and May 2016, and thus meet the management requirements laid down in Regulation (EC) 2023/2006 of 22 December 2006 on good manufacturing practices for materials and articles intended to come into contact with food, consolidated version of 17/04/2008.

This statement is valid until 23 December 2027, unless changes are required before then.

Dendermonde, 24 December 2025.



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