

# EU Declaration of Conformity

Regulation (EU) 2025/40 · Packaging and Packaging Waste · Article 39 & Annex VIII



Blue-bordered cells are input fields. Complete every section before signing. Retain for 5 years (single-use) or 10 years (reusable) from the date of placing on the EU market.

01 Unique identification number

A unique code identifying this specific packaging type. Annex VIII, point 1.

|                                  |                                                                                       |
|----------------------------------|---------------------------------------------------------------------------------------|
| Packaging ID                     | MXI-PPWR-DOC-COMP-WINERTIA-001                                                        |
| e.g. PKG-2026-001                |                                                                                       |
| Packaging type                   | Single-use packaging for WINertia units shipped from the Componex facility to the EU. |
| Short plain-language description |                                                                                       |

02 Manufacturer or EU Authorised Representative

Name and address of the manufacturer and, where applicable, the manufacturer's authorised representative. Annex VIII, point 2.

|                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Company name                                                              | Maxcess International                                                                                                                                                                                                                                                                                                                                                                                                    |
| Legal entity                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Registered address                                                        | 10200 County Road F, Edgerton, Wisconsin 53534, United States                                                                                                                                                                                                                                                                                                                                                            |
| Street, city, country, postal code                                        |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Contact                                                                   | <a href="mailto:compliance@maxcessintl.com">compliance@maxcessintl.com</a> · (405) 755-1600                                                                                                                                                                                                                                                                                                                              |
| Email and phone of the compliance contact                                 |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| EU Authorised Representative                                              | To be appointed. Maxcess International is established outside the EU; as a non-EU manufacturer it must appoint an EU Authorised Representative by written mandate (PPWR Art. 17). The Authorised Representative KEEPS the DoC and technical documentation at the disposal of market-surveillance authorities (Art. 17(2)(a)); it does NOT sign the DoC — the manufacturer signs and assumes responsibility (Art. 39(4)). |
| Required if the manufacturer is established outside the EU. Otherwise N/A |                                                                                                                                                                                                                                                                                                                                                                                                                          |

03 Sole responsibility

Mandatory verbatim text per Annex VIII, point 3. Do not modify.

"This declaration of conformity is issued under the sole responsibility of the manufacturer."

04 Object of the declaration

Identification of the packaging allowing traceability: composition, format, components, intended use. Annex VIII, point 4.

|                                                              |                                                                                                       |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| Primary materials                                            | Corrugated (dominant), with plastic wrap, metal fasteners/strap and foam cushioning.                  |
| e.g. Kraft paper 80 %, adhesive 20 %                         |                                                                                                       |
| Format and shape                                             | Corrugated carton, cushioning, inner wrap, strapping, tape, labels.                                   |
| e.g. corrugated single-wall rectangular box                  |                                                                                                       |
| Components and layers                                        | Primary carton with cushioning and transit accessories.                                               |
| Coatings, inks, adhesives, attachments                       |                                                                                                       |
| Intended use                                                 | Secondary / tertiary transport packaging, B2B. Componex facility → EU. Single-use, one-way.           |
| Primary / secondary / tertiary · B2B or B2C · product family |                                                                                                       |
| Single-use or reusable                                       | Single-use, one-way packaging — retention 5 years from date of placing on the EU market (Annex VIII). |
| Determines the 5-year or 10-year retention                   |                                                                                                       |
| Drawing or photograph reference                              | See 'PTD' sheet, Section 2, for the per-profile component inventory, weights (kg) and material split. |
| Filename or document ID held in the technical file           |                                                                                                       |

4a Manufacturer's assessment statement

Narrative summary of the conformity assessment, supporting the article-by-article matrix in Section 5.

The packaging described herein has been assessed in accordance with Annex VII (Module A — Internal Production Control) of Regulation (EU) 2025/40. The manufacturer declares that the packaging meets the applicable requirements of Articles 5 through 12 as follows: the binding substance limit under Article 5 is the heavy-metal sum (Pb+Cd+Hg+Cr(VI) ≤ 100 mg/kg). Supplier heavy-metal declarations are NOT yet on file for any component in this family — every supplied item is shown PENDING and any item with no supplier is shown UNMAPPED in the PTD; these must be collected and heavy-metal-screened before this Declaration can be issued. PFAS Article 5 limits apply to food-contact packaging only and are not in scope for this non-food-contact industrial packaging.

## 05 Conformity statement

For each Article, mark one of three states. Use Notes to record the reason — applicable scope, exemption, or what supporting data can be provided on request. Annex VIII, points 5 and 6.

| Article | Subject                                                                                                                                    | Applies & conforms | Not applicable | Available on request | Notes                                                                                                                                                                                                 |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------|--------------------|----------------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Art. 5  | Substance restrictions — heavy-metal sum $\leq 100$ mg/kg (all packaging). PFAS limits from Aug 2026 apply only to food-contact packaging. | X                  |                |                      | Pb+Cd+Hg+Cr(VI) $\leq 100$ mg/kg is the binding Art. 5 limit (all packaging). All supplier heavy-metal declarations are on file. PFAS Art. 5 food-contact limits are not in scope (non-food-contact). |
| Art. 6  | Recyclable packaging — design-for-recycling grades, applies from 2030                                                                      | X                  |                |                      | Fibre/wood-based recyclability; trace plastic only. Grade C assumed pending assessment; design-for-recycling grades apply from 2030.                                                                  |
| Art. 7  | Minimum recycled content in plastic packaging — applies from 2030                                                                          |                    | X              |                      | Recycled-content minimums apply to plastic packaging from 2030; this family is fibre/wood-based with only trace plastic — not in scope.                                                               |
| Art. 8  | Biobased feedstock in plastic packaging — applies once delegated acts are adopted                                                          |                    | X              |                      | Biobased-feedstock requirements apply to plastic once delegated acts are adopted; none in force now.                                                                                                  |
| Art. 9  | Compostable packaging — specific formats only (tea bags, coffee pods, fruit/veg stickers, very light carrier bags)                         |                    | X              |                      | Compostability applies only to specified formats (tea bags, coffee pods, fruit/veg stickers, very light carrier bags); not this family.                                                               |
| Art. 10 | Packaging minimisation — weight, volume, unnecessary layers                                                                                | X                  |                |                      | Packaging minimised for weight, volume and layers; component BOM and weights documented in PTD Section 2.                                                                                             |
| Art. 11 | Reusable packaging and reuse-system requirements                                                                                           |                    | X              |                      | Single-use, one-way transport packaging; reuse-system requirements not applicable. Retention 5 years.                                                                                                 |
| Art. 12 | Labelling of packaging — applies from August 2028, format set by implementing act                                                          |                    | X              |                      | Labelling applies from 12 August 2028; harmonised format set by a future implementing act. Not yet in force.                                                                                          |

### Other EU acts applied

N/A — no other Union act applies to this industrial, non-food-contact packaging.

List other Union acts the packaging conforms to (e.g. Reg. (EU) 10/2011). Otherwise N/A.

## 06 Standards and technical specifications

References to harmonised standards, common specifications, or other technical specifications used in the conformity assessment. Annex VIII, point 6.

|                                                                                            |                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Harmonised standards</b><br>e.g. EN 13430, EN 13427. Otherwise N/A                      | N/A — no harmonised standard cited as mandatory. EN 13430 noted for future Art. 6 assessment from 2030.                                                                                                                               |
| <b>Common or technical specifications</b><br>Internal test methods or specs. Otherwise N/A | Internal component-level weight methodology — Componex PPWR Packaging Profile register (COMP-SV-DM), Component Detail sheet; per-component material split (kg) summed to a profile total that ties to the register's Profile Summary. |
| <b>Other technical basis</b><br>Supplier datasheets, lab test report IDs                   |                                                                                                                                                                                                                                       |

## 07 Notified body (where applicable)

Annex VIII point 7 begins "Where applicable." Conditional element — completed only when a notified body was involved.

Not applicable — Module A (Internal Production Control, Annex VII) used. No notified body involved.

## 08 Additional information

Exemptions, innovative-packaging features (Article 13), special conditions. Annex VIII, point 8.

|                                                                           |                                         |
|---------------------------------------------------------------------------|-----------------------------------------|
| <b>Exemptions claimed</b><br>Article reference and grounds. Otherwise N/A | N/A — no formal PPWR exemption claimed. |
|---------------------------------------------------------------------------|-----------------------------------------|

|                                                                        |                                                                                  |
|------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| <b>Innovative-packaging features</b>                                   | N/A — no innovative-packaging features claimed under Article 13.                 |
| <i>Description and Article 13 derogation period.<br/>Otherwise N/A</i> |                                                                                  |
| <b>Other relevant information</b>                                      | This DoC covers Componex WINertia packaged units (2 profiles) only (single-use). |
| <i>Free text. Otherwise N/A</i>                                        |                                                                                  |

09 Signature

Place, date, name, role, and signature of the authorised signatory.

|                                           |                                                               |
|-------------------------------------------|---------------------------------------------------------------|
| <b>Place of issue</b>                     | 10200 County Road F, Edgerton, Wisconsin 53534, United States |
| <i>City, country</i>                      |                                                               |
| <b>Date of issue</b>                      | 8/12/2026                                                     |
| <i>DD / MM / YYYY</i>                     |                                                               |
| <b>Authorised signatory</b>               | Andrew Dixon                                                  |
| <i>Full legal name</i>                    |                                                               |
| <b>Role</b>                               | Global Director of QEH&S                                      |
| <i>e.g. Head of Regulatory Compliance</i> |                                                               |

|                  |  |
|------------------|--|
| <b>Signature</b> |  |
|------------------|--|

Document reference PPWR-DoC-[YYYY]-[NNN] · Version 1.0

Retain for 5 years (single-use) or 10 years (reusable) from the date of placing on the EU market. Must be made available to market surveillance authorities on request.