

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-WHQ-FLATPACK-001                                                                                        |
| e.g. PKG-2026-001                |                                                                                                                      |
| Packaging type                   | Single-use flat corrugated boxes (small/medium/large/x-large) used for shipments from the Eureka 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                              | Rotometrics                                                                |
| Legal entity                              |                                                                            |
| Registered address                        | RotoMetrics Main Office 800 Howerton Lane Eureka MO 63025                  |
| Street, city, country, postal code        |                                                                            |
| Contact                                   | <a href="mailto:Compliance@maxcessintl.com">Compliance@maxcessintl.com</a> |
| Email and phone of the compliance contact | +1 (405) 755 1600                                                          |

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 paper / cardboard flat boxes (small 21x17x1 to x-large 41x41x1) with trace plastic. Non-food-contact. |
| e.g. Kraft paper 80 %, adhesive 20 %                         |                                                                                                                  |
| Format and shape                                             | Flat corrugated boxes (small / medium / large / x-large); paper accessories; trace plastic. Single-use.          |
| e.g. corrugated single-wall rectangular box                  |                                                                                                                  |
| Components and layers                                        | Corrugated paper / cardboard (recyclable fibre); trace plastic; tape. Non-food-contact.                          |
| Coatings, inks, adhesives, attachments                       |                                                                                                                  |
| Intended use                                                 | Secondary / tertiary transport packaging, B2B. Eureka 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: substance concentration limits under Article 5 are addressed via supplier declarations held in the technical file (currently PENDING for this family); packaging weight and volume have been minimised under Article 10; the packaging is fibre/wood-based with only trace plastic, so Article 7 recycled-content minimums (plastic) are not in scope; Article 6 design-for-recycling grades for the fibre fraction phase in from 2030; labelling under Article 12 applies from 12 August 2028. This packaging is single-use, one-way, and is not placed on the market as reusable, so Article 11 reuse-system requirements do not apply. Covers the Eureka FCBS/FCBM/FCBL/FCBXL flat corrugated boxes; component weights (kg) are in the PTD sheet. |
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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 ≤ 100 mg/kg (all packaging). PFAS limits from Aug 2026 apply only to food-contact packaging. | X |   |  | Pb+Cd+Hg+Cr(VI) ≤ 100 mg/kg. Supplier declarations ON FILE for this family — see PTD Section 5.                                      |
| Art. 6  | Recyclable packaging — design-for-recycling grades, applies from 2030                                                                 | X |   |  | Fibre-based recyclability; trace plastic. Grade C default; design-for-recycling grades apply from 2030.                              |
| Art. 7  | Minimum recycled content in plastic packaging — applies from 2030                                                                     |   | X |  | Art. 7 recycled-content minimums apply to plastic packaging; 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 rules apply to plastic once delegated acts adopt — none in force now.                                                       |
| Art. 9  | Compostable packaging — specific formats only (tea bags, coffee pods, fruit/veg stickers, very light carrier bags)                    |   | X |  | Compostable rules cover only specific formats (tea bags, pods, stickers). Not applicable.                                            |
| Art. 10 | Packaging minimisation — weight, volume, unnecessary layers                                                                           | X |   |  | Minimised to necessary weight/volume/layers. Component BOM in PTD Section 2.                                                         |
| Art. 11 | Reusable packaging and reuse-system requirements                                                                                      |   | X |  | Single-use, one-way packaging — not placed on the market as reusable. Art. 11 reuse-system requirements not applicable.              |
| Art. 12 | Labelling of packaging — applies from August 2028, format set by implementing act                                                     |   | X |  | Labelling applies from 12 Aug 2028; format pending implementing act.                                                                 |

|                                                                                                          |                                                                                  |
|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| <b>Other EU acts applied</b>                                                                             | N/A — no other Union act applies to this industrial, non-food-contact packaging. |
| List other Union acts the packaging conforms to (e.g. <i>EN 13430</i> , <i>EN 13427</i> ). 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>                            | N/A — no harmonised standard cited as mandatory. EN 13430 noted for future Art. 6 assessment from 2030.                                                              |
| e.g. <i>EN 13430</i> , <i>EN 13427</i> . Otherwise N/A |                                                                                                                                                                      |
| <b>Common or technical specifications</b>              | Internal component-level weight methodology — Eureka PPWR Packaging Profile register (MXI-PPWR-REG-001), weights in kg per component.                                |
| Internal test methods or specs. Otherwise N/A          |                                                                                                                                                                      |
| <b>Other technical basis</b>                           | Supplier PPWR/EPR declarations for this family are PENDING (see PTD Section 5). Packaging suppliers vary by component and have not been mapped to specific profiles. |
| 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>                                   | N/A — no formal PPWR exemption claimed.                                              |
| Article reference and grounds. Otherwise N/A                |                                                                                      |
| <b>Innovative-packaging features</b>                        | N/A — no innovative-packaging features claimed under Article 13.                     |
| Description and Article 13 derogation period. Otherwise N/A |                                                                                      |
| <b>Other relevant information</b>                           | This DoC covers Eureka FCBS/FCBM/FCBL/FCBXL flat corrugated boxes only (single-use). |
| Free text. Otherwise N/A                                    |                                                                                      |

## 09 Signature

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

|                       |                 |
|-----------------------|-----------------|
| <b>Place of issue</b> | 800 Howerton Ln |
|-----------------------|-----------------|

City, country

Eureka, MO 63025

Date of issue

8/11/2026

DD / MM / YYYY

Authorised signatory

Andrew Dixon

Full legal name

Role

Global Director of QEH&S

e.g. Head of Regulatory Compliance

Signature

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.