

Packaging and Packaging Waste Regulation (PPWR) Compliance and Circular Packaging Statement

Faes Group B.V. hereby declares that it is fully aware of the European **Packaging and Packaging Waste Regulation (PPWR – Regulation (EU) 2025/40)** and its implications for the development, production, and supply of packaging solutions, including industrial packaging.

The PPWR introduces a harmonised and legally binding framework for all packaging placed on the European market, with the objective of reducing the environmental impact of packaging, minimising packaging waste, and promoting the circular economy. These requirements apply to all packaging, including industrial packaging such as transport and storage packaging, regardless of material type or application.

Applicability to Industrial Packaging

Faes Group B.V. acknowledges that industrial packaging falls within the scope of the PPWR. While specific conditions or flexibilities may apply to certain applications—such as reusable systems, internal logistics, or packaging not placed on the consumer market—the fundamental principles of the Regulation remain fully applicable.

Recyclability and Circular Design

Faes Group B.V. is committed to the obligations relating to sustainable design and circularity, including

- Designing packaging solutions that are fully recyclable by 2030 and comply with applicable design-for-recycling requirements.
- Optimising packaging concepts to support high-quality recycling and material recovery.
- Applying recycled materials in plastic packaging in accordance with the prescribed minimum content requirements, where this can be achieved without compromising functionality or product protection.
- Integrating relevant customer-specific sustainability, material, and compliance requirements into the design and evaluation process for packaging solutions, including—where applicable—the ASML General Specification for Suppliers (GSA) and comparable customer guidelines concerning circularity, material use, recyclability, and product compliance.

Reuse and Industrial Packaging Systems

For industrial packaging, Faes Group B.V. recognises the importance of reuse within circular value chains:

- Development and deployment of reusable packaging solutions with a long service life.
- Support for closed-loop logistics systems for transport packaging such as pallets, crates, and containers.
- Alignment throughout the supply chain with reuse objectives applicable to industrial applications.

- Application of the **RTM (Return-to-Manufacturer Management) process**, whereby packaging is returned after use, inspected, repaired, refurbished, and reintroduced into service, with the aim of extending the functional lifespan of packaging, reducing waste, and maximising the reuse of materials and packaging systems.

Minimisation of Packaging Use

Faes Group B.V. ensures that its packaging solutions comply with requirements for efficient material usage:

- Packaging is designed with a minimum of weight and volume, without compromising functionality or product protection.
- Unnecessary packaging features and excessive material use are avoided.
- Empty space within transport and e-commerce packaging is minimised wherever possible.

Restriction of Hazardous Substances

Faes Group B.V. ensures that its packaging solutions comply with applicable substance-related requirements:

- The combined concentration of lead, cadmium, mercury, and hexavalent chromium does not exceed 100 mg/kg.
- The use of substances of concern is minimised wherever possible.
- Preparation for additional restrictions, including PFAS bans in relevant applications.

Labelling and Information Requirements

Faes Group B.V. will anticipate future obligations regarding:

- Indication of material composition on packaging to support proper waste sorting and recycling.
- Implementation of harmonised labelling and digital information systems (for example through QR codes) for reusable packaging systems.

Responsibility and Reporting

Faes Group B.V. recognises its role and responsibilities within the supply chain and is committed to:

- Compliance with registration and reporting obligations relating to packaging and packaging waste.
- Participation in systems for the collection, recycling, and reuse of packaging.

Conformity Assessment and Documentation

Faes Group B.V. intends to implement obligations relating to:

- Establishing a packaging technical file for each packaging type.
- Conducting conformity assessments prior to placing packaging on the market.
- Maintaining technical documentation and declarations of conformity for competent authorities.

Declaration

Faes Group B.V. confirms its full commitment to the PPWR and actively integrates its requirements into its business processes. Industrial packaging forms an important part of the transition towards circular value chains, and Faes Group supports its customers with future-proof, compliant, and sustainable packaging solutions.

Should you require further clarification or a customer-specific interpretation of this statement, we will be pleased to provide additional information.

Faes Group B.V.

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