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ENGLISH TRANSLATION OF THE SIGNED GERMAN ORIGINAL

This document is an English translation of the signed German original Declaration of Conformity issued by Lahnpaper GmbH. In the event of any discrepancy, inconsistency or conflict between this translation and the signed German original, the German original shall prevail.

EU DECLARATION OF CONFORMITY (DoC)

in accordance with Regulation (EU) 2025/40 (Packaging and Packaging Waste Regulation – PPWR)

Unique Identification:	DoC-R1a-2026-01
Packaging Group:	R1a – Paper Tubes / Cores (internal DoC classification)
Producer:	Lahnpaper GmbH Auf Brühl 15-27 56112 Lahnstein, Germany
Contact:	Sustainability Management, sustainability@lahnpaper.de
Date of Issue:	31 July 2026
Scope:	Winding board / hard paper; no direct food contact; no added PFAS, SVHCs or heavy metals above the applicable legal limit values.

1. Subject of Declaration

This declaration is issued under the sole responsibility of Lahnpaper GmbH and applies to all packaging assigned to the internal DoC group R1a – Paper Tubes / Cores (12 articles). The group comprises packaging and packaging components based on winding board / hard paper that are used by Lahnpaper GmbH for securing, protecting or shipping products.

The articles covered by this declaration differ only in dimensions, format and cut, but not in material, structure or material composition. A grouped declaration is therefore permissible, provided that none of the material requirements of Articles 5 to 12 of Regulation (EU) 2025/40 are affected. The material and structural classification of the individual articles is documented in Annex 1 of this declaration and in the technical documentation (Section 4) and can be demonstrated at article level in the event of a market surveillance inspection.

2. Declaration of Conformity

Lahnpaper GmbH hereby declares under its sole responsibility that the packaging group described in Section 1 complies with the substance restrictions applicable to it under Article 5 of Regulation (EU) 2025/40 (PPWR).
This declaration relates exclusively to the packaging described in Section 1 and not to the product packed therein. It is intentionally limited to Article 5. Assessment of the requirements of Articles 6 to 12 (including recyclability, recycled content, packaging minimisation and reuse) is not covered by this declaration and is addressed separately.

3. Substance Restrictions under Article 5

Article 5(4) – Heavy Metals
The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium in the packaging or packaging components does not exceed the limit value of 100 mg/kg.

Article 5(5) – PFAS
The restriction on per- and polyfluoroalkyl substances pursuant to Article 5(5) is not applicable to this packaging group, as there is no direct food contact within the meaning of the Regulation.

4. Technical Documentation and Basis of Assessment

Conformity is demonstrated through internal technical documentation in accordance with Annex VII of Regulation (EU) 2025/40.

This documentation includes in particular:

- Material and product specifications for each article within the packaging group
- Internal substance compliance assessments
- Available supplier information and declarations regarding heavy metals and PFAS

As of the date of issue, no harmonised standards or common technical specifications within the meaning of Article 39(2) were available for assessment under Article 5. The assessment is therefore based on the internal technical documentation referred to above.
The involvement of a notified body is not required for this conformity assessment; accordingly, no notified body participated.
Supplier-specific raw data do not form part of this declaration but are part of the underlying technical documentation, which is retained for at least five years after placing on the market in accordance with Article 39(3) for single-use packaging.

5. Validity and Updates

This declaration applies to all packaging assigned to the above-mentioned packaging group as of the date of issue (see Annex 1).
Changes in material, structure or specification of one or more articles within this group require an immediate reassessment and, where necessary, a new or revised version of this declaration.

Lahnstein, 31 July 2026

This English translation is valid without a separate signature. The signed German original remains the legally binding version.

Thomas Fuhrmann
CEO

Kai-Alexander Klein
CFO

Annex 1 List of Articles

The following table lists all articles assigned to packaging group R1a – Paper Tubes / Cores as of the date of issue of this declaration and covered by this declaration:

Raw Material No.	Product Name
RH6100.0109	Huelse 2600 x 76 x 12 mm
RH6100.0315	Huelse 2300 x 71 x 12 mm