Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) "Heavy Metals" (Article 5.4)

This statement concerns the Regulation (EU) 2025/40's requirement on heavy metals and is issued on **2026.07.17** to **Luboš Bašta, Kartonážní výroba, Dolní Město 57, 582 33 Dolní Město** (the "Customer").

This statement applies to the portfolio of products supplied by Smurfit Westrock sites as described in Annex 1 (the "Products").

Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) entered into force on 11 February 2025 and will apply from 12 August 2026.

Article 5 sets requirements on substances in packaging, including limits on certain hazardous substances. Article 5(4) specifies that the sum of concentrations of lead, cadmium, mercury and hexavalent chromium present in packaging or its components shall not exceed 100 mg/kg.

Based on information as received from our suppliers, and analytical results available to date, Smurfit Westrock declares the following for the Products supplied to the Customer in the E.U.:

- The Products do not contain intentionally added heavy metals; and
- Levels of lead, cadmium, mercury and chromium VI I the Products are regularly monitored and remain below the 100 mg/kg limit.

This declaration is based on the absence of intentionally added heavy metals in our production process, the analytical testing performed to date and a representative assessment of our materials. It is based on information from our suppliers and reflects Smurfit Westrock's current understanding of applicable requirements at the date of issue. Given the diversity of our product portfolio, it should be noted that not every individual packaging has been tested. Smurfit Westrock will continuously monitor compliance to article 5(4) of the PPWR.

Risk assessments would be available upon request to competent authorities during official controls or to third-party auditors during audits.

Smurfit Westrock is actively monitoring relevant legislative developments, and reserves the right to update or amend this statement where required.

This statement shall remain valid until **2027.07.17**, unless it is withdrawn, amended, or rendered invalid at an earlier date as a result of changes in applicable laws, regulations, or authorities' guidance.

Any material changes will be communicated as appropriate.

Petr Dokoupil
Managing director – Brno plant
Smurfit Westrock

Annex 1 – Products covered by this statement

This statement applies to all products delivered from sites listed below:

Site Name	Plant Adress
Smurfit Westrock Czech s.r.o. – Brno plant	*Tovární 15. 643 00 Brno*

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) "PFAS" (Article 5.5)

This statement concerns the Regulation (EU) 2025/40's requirements on PFAS and is issued on **2026.07.17** to **Luboš Bašta, Kartonážní výroba, Dolní Město 57, 582 33 Dolní Město** (the "Customer").

This statement applies to the portfolio of products supplied by Smurfit Westrock sites as described in Annex 1 (the "Products").

Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) entered into force on 11 February 2025 and will apply from 12 August 2026.
Article 5(5) sets limits on PFAS in packaging intended for food contact, including:

- 25 ppb for individual targeted PFAS;
- 250 ppb for the sum of targeted PFAS;
- 50 ppm for PFASs assessed via total fluorine.

There is currently no harmonised EU testing methodology for PFAS in food contact packaging. In this context, the European Commission has recommended a stepwise enforcement approach, based on current available methodologies:

- As a first step Total Fluorine (TF) screening. Packaging with total fluorine below 50 ppm would be considered compliant.
- Additional analyses (e.g. determination of organic fluorine and/or targeted PFAS analysis) are only required if the total fluorine level exceeds this value.

Based on information as received from our suppliers, and analytical results available to date, Smurfit Westrock declares the following for the Products supplied to the Customer in the E.U.:

- The Products do not contain intentionally added PFAS.
- In accordance with the European Commission guidance, total fluorine (TF) analysis has been used as a first step, showing a total fluorine content in the Products below the 50 ppm threshold.

This declaration is based on the absence of intentionally added PFAS in our production process, the analytical testing performed to date and a representative assessment of our materials. It is based on information from our suppliers and reflects Smurfit Westrock's current understanding of applicable requirements at the date of issue. Given the diversity of our product portfolio, it should be noted that not every individual packaging has been tested. Smurfit Westrock will continuously monitor compliance to article 5(5) of the PPWR.

Risk assessments would be available upon request to competent authorities during official controls or to third-party auditors during audits.

Smurfit Westrock is actively monitoring relevant legislative developments and reserves the right to update or amend this statement where required.

This statement shall remain valid until **2027.07.17**, unless it is withdrawn, amended, or rendered invalid at an earlier date as a result of changes in applicable laws, regulations, or authorities' guidance.

Any material changes will be communicated as appropriate.

Petr Dokoupil
Managing director – Brno plant
Smurfit Westrock

Annex 1 – Products covered by this statement

This statement applies to all products delivered from sites listed below:

Site Name	Plant Adress
Smurfit Westrock Czech s.r.o. – Brno plant	*Tovární 15. 643 00 Brno*