Declaration of Compliance

Trade name	VINCICOAT, SERVIBOARD, HERMICOAT, TRIPLEX GRIS, SYROS ESTUCADO
Product description	White top coated recycled chipboard with grey back (GD2, according to DIN19303 definition)
Grammage	Ranges between 250 g/m^2 to 550 g/m^2 For more information see technical specification on https://rdmgroup.com
Fiber source	Recycled and virgin fibers
Production sites	Santa Giustina, Barcelona, Arnsberg, Blendecques, Paprinsa, Villa Santa Lucia
Producer	RdM Group

1. Instructions for safe and appropriate use

The paperboard complies under foreseeable conditions of use with Regulation (EC) No 1935/2004 (state of June 18, 2009) on materials and articles intended to come into contact with food.

When converting these paperboards each part of the converting chain is responsible for the suitability for the intended end-use.

The properties of the cardboard can change as a result of processing. The conformity only refers to the delivered condition, which is respecting specific Technical Data Sheets and the fulfilling the GMP applied in our mills, as requested by (EC) No 2023/2006

When packing dry foodstuffs with large surface is recommended an appropriate intermediate packaging, if migration via the gas phase onto the food is to be expected.

The information contained in this certificate is based on the Risk Analysis Assessment carried out as well as on analyses performed on representative board samples.

This recycled board grade is intended for packaging food, for secondary packaging and packaging applications involving direct contact with dry, non-fatty foodstuffs and such kind of foodstuff which are peeled, shelled or washed before consumption according to the BfR Recommendation XXXVI.
Furthermore, may also be used for packaging of frozen foodstuff, provided that the foodstuff does not freeze and defreeze in the packaging itself.

2. Compliance with European food contact legislation

All our grades are manufactured mainly from recycled fibers and only food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conforms to established technology and is in compliance with GMP.

The paperboard complies under foreseeable conditions of use with:

- Regulation (EC) No 1935/2004 (state of June 18, 2009) on materials and articles intended to come into contact with food
- (EC) No 2023/2006 (state of December 22, 2006) on good manufacturing practice for materials and articles intended to come into contact with food.
- BfR Recommendation XXXVI (state of February 1, 2023): Paper and board with limitations mentioned in Instructions for safe and appropriate use. Compliance with Food contact approved substances listed in Section A (Raw Materials) – Section B (Production aids) – Section C (Special Paper refining agents).
- Fiche MCDA nº4 /V02-01/01/2019) « Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires », as far as it is used as secondary packaging with an appropriate intermediate packaging.
- CEPI Food contact guidelines for the compliance of paper and board materials and articles (state of May 2023).

3. Analyses

Compliance with BfR Recommendation XXXVI (state of February 1, 2023) and French Fiche MCDA n°4 (state of January 1, 2019): The paperboard complies with the requirements in BfR Recommendation XXXVI, Paper and Board and Fiche MCDA n°4. Analyses have been performed on representative samples of paperboard, according to a specific Risk Analysis Assessment.

4. Substances

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance, or quality. Please note that we do not analyze the paperboard for all the substances listed below. Information below is based upon our Risk Analysis Assessment and according to the application of GMP. The occurrence of traces from the use of recycled fibers cannot be excluded.

GMO
We hereby confirm that Genetically Modified Organisms (GMO) as defined by European Union* are not intentionally added in the production paperboard. Our suppliers can however not exclude adventitious and technically unavoidable contamination**.
* *https://food.ec.europa.eu/plants/genetically-modified-organisms_en*
** Regulation 1830/2003 on traceability and labelling of GMO; "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."

ANIMAL ORIGIN
We hereby confirm that no additive of animal origin is intentionally added in the production of paperboard.

FOOD ALLERGENS
Allergens listed in (EU) N° 1169/2011, which exclusively regulates food goods production and distribution, are not intentionally added in the internal composition of our paperboards. Our GMP standards prevent contaminations along the production process.

PALM OIL
We hereby confirm that no palm oil is intentionally added in the production of paperboard, traces from recycling paper are possible.

PHTHALATES
We hereby confirm that no phthalates are intentionally added in the production of paperboard, traces from recycling paper are possible.

BISPHENOL A and BISPHENOL S
We hereby confirm that no bisphenol A or bisphenol S are intentionally added in the production of paperboard, traces from recycling paper are possible.

PULP AND BLEACHING
If virgin fibers are used for board qualities, only TCF or ECF bleached fibers are used. There is no bleaching of fibers with chlorine.

NANOMATERIALS
Nanomaterial defined as: "substances intentionally produced at nanometric scale" are not used for the production of board in the Reno De Medici group. (Decree no. 2012-232, application of article R. 523-4 of the French Environment code).

PER- AND POLY-FLUOROALKIL SUBSTANCES (PFAS)
We hereby confirm that no polyfluorinated substances are intentionally added in the production of paperboard, traces from recycling paper are possible.

ENDOCRINE DISRUPTORS & POP
Our products do not contain substances that have undergone the full evaluation process for endocrine disruption as regulated in the EU under REACH legislation (the Candidate - and Authorization Lists) and by the French legislation AGEC (Arrêté du 28 septembre 2023 and Arrêté du 30 août 2023).
None of the active substances listed in EU Regulation 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (POPs), updated by regulations (EU) 2022/2291 and (EU) 2022/2400, is intentionally and directly added in the final products of the Reno de Medici group. These ubiquitous substances cannot be totally excluded. The substances listed have not been detected in our cards for several years.

OBA
Optical brighteners are present in all recycled cartons, whether used or not. However, there is no migration via the gas phase, so that no migration takes place in dry, non-fatty foods.

LATEX
Latex is the commercial name of natural rubber which is not used in our board manufacturing process. In our production we are using styrene-butadiene co-polymer water-based dispersion as binder in our top and back coatings.

MINERAL OILS
MOSH and MOAH, which are mainly coming from inks used in printing and therefore present in our raw materials, are monitored both for their content in our products and for their migration to food according to methods recognized at European level (National Reference Laboratory for Food Contact Materials at the Federal Institute for Risk Assessment - BfR Germany). More specific statements are available throughout our Technical Customer Service.

5. Additional legislation and regulations, not food related

- Directive (EC) 2018/852 (state of May 30, 2018) amending Directive 94/62/EC on packaging and packaging waste.
- REACH Regulation (EC) 1907/2006 (Updated RdM Reach statement available on our website https://rdmgroup.com):
  - Substances in the Candidate List of SVHCs (incl. Annex XIV, Authorization) in a concentration > 0.1% (w/w).
  - Substances included in Annex XVII, Restrictions, where the restriction is applicable on our use. Traces from recycled raw materials are possible.
  - "Microplastics Restriction": Regulation (EU) 2023/2055 regarding the limitations on the use of synthetic microplastics.
- EN 71 – 3 rd. part, "Safety of toys – Migration of certain elements.
- Regulation (EU) 2023/1115 (EUDR – European Deforestation-free products Regulation): the raw materials used comply with the requirements of the Regulation, according to the mandatory checks carried out regarding their origin.
- Raw materials selected according to EN643:2013.

6. Certified Management System in our production sites

All certificates and recognitions related to our production sites, Sustainability and Ethic reports are available on our website https://rdmgroup.com

7. Storage and handling requirements

To ensure its safety and technical properties, the product must be stored indoors in a dry place at temperatures from 5 to 25 °C and RH% from 45 to 65% without the influence of odors and sheltered from weathering. We recommend converting of the paperboard within 6 months from delivery date and after this time rights of claims normally disappear.

8. Disclaimer

It is the responsibility of the manufacturer of the finished packages to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications, and limitations in the intended application. This declaration and its contents are subject to the following additional limitations and disclaimers:

- This document is valid and applicable for a proper use of the product as declared in Section 1 "Instructions for safe and appropriate use" and Section 7 "Storage and handling requirements" of this document.
- The product user is recommended to avoid any possible product misuse that could have, as a consequence, a legal infringement or risk for health or environmental impact.
  RDM Group will not be responsible of any consequence related to a product improper use.
- Based on our risk analysis, the information set out herein is accurate to our current best knowledge only. We take no responsibility for information that has been provided to us by our suppliers and on which we have relied when manufacturing the products to which the present document refers to.
- This declaration is only valid as of its date of publication and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, European regulatory requirements, European applicable legislation and rules or otherwise.
- This declaration is only valid to the extent it has been signed and delivered by an authorized responsible of the RdM Group.
- Nothing in this declaration shall be interpreted as a warranty (direct or implied) with respect to (a) anything beyond what is expressly set out herein, (b) the merchantability or fitness for a particular purpose (other than the product's defined purpose), (c) the use, or the suitability for use, in connection with other products or materials, or (d) the safety or legality in any use, processing and handling of our products.
- This declaration forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in such delivery contract shall apply to this certificate. In the event of a discrepancy, the contract signed, the purchase order confirmed and the RDM Group General Terms and Conditions will prevail.
- No one other than the addressee may rely on this declaration and we assume no liability whatsoever to any third party.
- RDM Group will not be responsible in case of a lack of any specific additional information herein. This document has been prepared according to legal and mandatory information requirements and any further information, not required to be included by law, may be provided upon request.
- RDM Group will not be responsible in case of export of finished products with our materials to countries that require different and/or additional declarations to those listed in this document
- The validity of this declaration refers to the last release available on our website (https://rdmgroup.com/products/catalogue/)

Approved by:

Krzysztof Krajewski

Krzysztof Krajewski
RdM Chief Sustainability & Innovation Officer