

EU Declaration of Conformity for Packaging

in accordance with Regulation (EU) 2025/40 (PPWR)

1. Manufacturer

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2. Subject matter of the declaration

This Declaration of Conformity applies to all packaging used by Granula AG in connection with the delivery of products to customers.

The types of packaging concerned include, in particular:

- Retail packaging (e.g. bags, liners, films)
- Outer packaging (e.g. cartons, octabins)
- Labelling elements (e.g. labels)
- Transport packaging (e.g. stretch film, pallets)

A detailed list of the individual packaging items is provided in **Annex A (Packaging Overview)**. **Annex B** sets out typical combined packaging scenarios.

3. Conformity assessment procedure applied

Conformity assessment is carried out in accordance with **Annex VII – Module A (Internal Production Control)** of Regulation (EU) 2025/40.

Granula AG declares, on its own responsibility, that the packaging items mentioned comply with the applicable requirements of Articles 5 to 12 of the Regulation, insofar as these apply to the respective packaging items.

4. Basis of the assessment

The conformity assessment is based on the following sources of information:

- Supplier declarations regarding packaging materials
- Raw material specifications and technical data sheets
- Internal assessments and plausibility checks
- Available information on material composition and recyclability

The underlying documents are referenced in **Annex C (Supporting Documentation)**.

5. Assessment of regulatory requirements

5.1 Substance restrictions (Article 5)

Based on the supplier declarations and specifications provided, it is assumed that the packaging used meets the requirements regarding:

- heavy metals (Pb, Cd, Hg, Cr VI) < 100 ppm
- PFAS (where applicable)
- other relevant substance restrictions.

This assessment is based on the supplier confirmations provided by the suppliers regarding the packaging we use. No SVHC/SoC substances are intentionally used. Traces resulting from recycled materials cannot be completely ruled out, but are below regulatory limits. We have not carried out our own analytical tests on the packaging.

5.2 Recyclability and proportions (Article 6)

The packaging used consists predominantly of established materials (e.g. PE, PP, paper/cardboard) for which existing collection and recycling infrastructure is in place.

Where relevant information is available from suppliers, recyclability is confirmed.

A comprehensive assessment in accordance with future harmonised criteria (e.g. performance classes A–C) is not yet possible at this stage.

Corrugated cardboard: Recyclable, recycled content approx. 50–70%

Stretch film (LDPE): Recyclable

Pallets (wood): Reusable

5.3 Proportion of recycled material (Article 7)

Information on the use of recycled materials is currently only partially available.

A full assessment of compliance with future minimum requirements is not yet possible at the time of drafting this statement and is not legally required until 2030.

Specific PCR data is currently being requested from suppliers. Availability is expected in the course of 2026/2027.

5.4 Reusability (Article 11)

The packaging used is predominantly designed as single-use packaging. Requirements for reusable packaging are therefore only of limited relevance. Upon request, outer packaging can be reused once a certain sales volume has been reached. Please contact our sales department for further details.

Pallets: reusable

Cardboard boxes: single-use, but recyclable

6. Restrictions and scope of the declaration

This declaration of conformity is based on the information available at the time of its preparation.

In particular, the following should be noted:

- The quality and level of detail of the supplier declarations vary.
- In some cases, only general or generic declarations of conformity are available.
- For individual packaging items, the supporting evidence is still incomplete.
- The regulatory requirements of the PPWR are being clarified in stages (e.g. through delegated acts and technical specifications).

Granula AG is continuously monitoring regulatory developments and will update the technical documentation and this declaration accordingly.

7. Declaration

Granula AG hereby declares that, based on the available information and internal assessments, the packaging mentioned above complies with the applicable requirements of Regulation (EU) 2025/40, insofar as these are currently binding and assessable.

This declaration is made to the best of our knowledge and belief, and subject to the above-mentioned limitations.

Merenschwand, 3rd September 2026

Jürg Weibel, Member of the Board of Directors

Document valid without a signature.

Appendix A – Packaging Overview

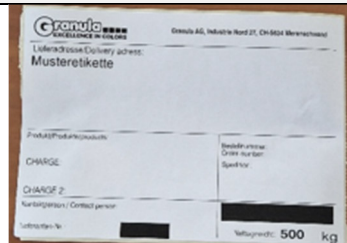
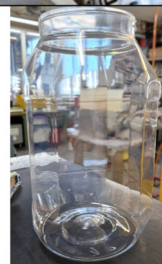
Appendix A provides a general overview of packaging and is not product-specific. A detailed breakdown by item will be provided.

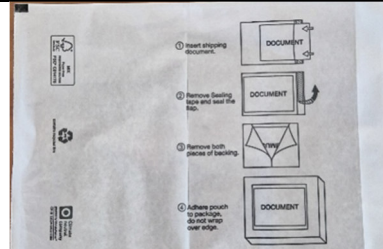
The order of the packaging types is based on their relevance (frequency and proportion by weight) at Granula AG.

ERP item no.	Internal designation	Packaging category PPWR	Recycling code, PPWR	Material	Recycled content (%)	Document reference: Suppliers	Design / Photo	Assessment status
48230	PE bags with Granula logo, transparent	Retail packaging	Flexible plastic	PE	0 %	PPWR Explanation		OK
48248	OKTABIN LARGE [1100x1100x1800mm] (Base, lid: see item no. 50440; stretch film: see item no. 48637)	Outer packaging	Cardboard	Paper/cardboard/paperboard	44 %	PPWR Explanation		OK

ERP item no.	Internal designation	Packaging category PPWR	Recycling code, PPWR	Material	Recycled content (%)	Document reference: Suppliers	Design / Photo	Assessment status
50440	Octagonal Oktabin base/lid	Outer packaging	Cardboard	Paper/cardboard/paperboard	72 %	PPWR Explanation		OK
51920	Inliner for Octabin (side-gusseted tubular film)	Retail packaging	Flexible plastic	PE	0 %	PPWR Explanation		OK
n/a	EURO ISPM 15 pallets (CP1, CP7, half-pallets, EURO pallets)	Transport packaging	Wood	Wood	0 %	not available		open
48637	Pallet stretch film	Transport packaging	Flexible Plastic	PE	0 %	PPWR Explanation		OK

ERP item no.	Internal designation	Packaging category PPWR	Recycling code, PPWR	Material	Recycled content (%)	Document reference: Suppliers	Design / Photo	Assessment status
48247	OKTABIN SMALL [1100x1100x1250mm]	Outer packaging	Cardboard	Paper/cardboard/paperboard	0 %	PPWR Explanation		OK
48974	Cartons for 25kg masterbatch bags	Outer packaging	Cardboard	Paper/cardboard/paperboard	0 %	PPWR Explanation		OK
48101	PE labels 105 x 74 (small)	Retail packaging	Flexible Plastic	PE	0 %	PPWR Explanation		GAP

ERP item no.	Internal designation	Packaging category PPWR	Recycling code, PPWR	Material	Recycled content (%)	Document reference: Suppliers	Design / Photo	Assessment status
48102	SK Labels, paper, 150 x 210 (large)	Transport packaging	Paper	Paper	0 %	PPWR Explanation		GAP
48661	Pallets – Cardboard blank MK 600 / 75 x 115 cm	Transport packaging	Cardboard	Cardboard	0 %	PPWR Explanation		OK
51206	Granula PVC adhesive tape 50 mm x 66 m, printed	Transport packaging	Flexible Plastic	PVC	0 %	PPWR Explanation		open
50830	PET cans 100SP400, 3,250 ml, clear	Retail packaging	Rigid plastic	PET	0 %	PPWR Explanation		GAP
50831	100SP400, white closure	Retail packaging	Rigid plastic	PE	0 %	PPWR Explanation		OK

ERP item no.	Internal designation	Packaging category PPWR	Recycling code, PPWR	Material	Recycled content (%)	Document reference: Suppliers	Design / Photo	Assessment status
n.a.	Inka pallet, compressed chipboard pallet 800 x 600 mm	Transport packaging	Wood	Wood	0 %	open		open
n/a	DHL display bags, others	Transport packaging	Flexible plastic	PE	0%	open		open

Appendix B – typical packaging scenarios – delivery to customers

Typical customer order	Typical packaging and quantities of materials*	Typical image
25 kg masterbatch	1 carton (cardboard box, 1 bag (PE, 160 grams) 1 bag label (PE, 0.4 grams) 1 adhesive tape (PVC, 8 grams)	
Masterbatch or compounds > 100 kg or multiples up to 500 kg	1 wooden pallet (8–16 kg) 1 sack (PE, 160 grams) 1 sack label (PE, 0.4 grammes) 1 stretch film (PE, 0.3 kg per 50 cm of pallet height) 1 label on stretch film (paper, 2 grams)	
Masterbatch or compounds > 500 kg in 25 kg bags	2 wooden pallets (8–16 kg) >1 bag (PE, 160 grams) > 20 bag labels (PE, 0.4 g per label) 1 stretch film (PE, 0.6 kg per 100 cm of pallet height)	
Masterbatch or compounds in octabins	1 wooden pallet (12–14 kg) 1 octabin (cardboard box, 10.7 kg each) 2 lids/bases (cardboard, 1.25 kg each) 1 large label (paper, 1.2 grams) 1 inner liner (PE, 1.5 kg) 1 stretch film (PE, 1.2 kg)	
Rotomoulding in Octabin	1 wooden pallet (12–14 kg) 1 Octabin (cardboard, 10.7 kg each) 2 lids/bases (cardboard, 1.25 kg each) 1 large label (paper, 1.2 grams) 1 liner (PE, 1.5 kg)	See above, but without stretch film

* For details of the packaging, see Appendix A

Appendix C – Supporting Documentation

This documentation has been compiled from the PPWR compliance records of our packaging suppliers and is based on information current up to the end of August 2026. It will be versioned and made available for our customers to download online in future

We are currently in the process of compiling our own supporting documentation and are awaiting further data from our packaging suppliers. The suppliers' declarations indicate that technical documentation is available upon request from the authorities.