

Finnco Iberflex Papéis Transformados, S.A.

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Products referred to this statement:**70+11Grs Gloss polyethylene coated offset paper**

Finnco Iberflex - Papéis Transformados, S.A. declares that the products mentioned above are formulated with raw materials complying with EU Legislation, in particular:

- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food (including current amendments).
- Regulation (EU) 2025/40 the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, which replaces Directive 94/62/EC, adhering to the maximum limit of 100 ppm by weight for the sum of concentration of lead, cadmium, mercury, and hexavalent chromium.
- Regulation (EU) No. 10/2011 of the Commission relating to plastic materials and articles intended to come into contact with foodstuffs (including current amendments up to and including 2025/351 of 25 February 2025). The product does not contain recycled materials and fully complies with the requirements of Regulation (EU) 2025/351.
- Regulation (EC) n°. 2023/2006, of the Commission on good manufacturing practices for materials and articles intended to get in contact with food (including current amendments).

A. Specification of the intended use or limitations:

1. Types of food intended to come into contact with material: all types off food.
2. Durations and temperature of treatment and storage while in contact with food: all storage times under refrigeration and freezing conditions for all food types, any long-term storage at or below room temperature, including hot filling and / or heating to a temperature T where $70^{\circ}C \leq T \leq 100^{\circ}C$ for a maximum period of $t = 120/2^{((T-70)/10)}$ minutes.
3. Regarding the overall migration values, material compliance was determined using a ratio between the surface area in contact with food and the volume of 6 dm² / kg.

Please be informed that, in accordance with Regulation (EU) n. ° 10/2011 of the Commission, the determination of migration should be made from the final articles in contact with the foodstuff or simulant in a manner representing the conditions in actual use, during a period of time and at a temperature chosen by reference to the contact conditions in actual use. Finnco conducts tests under standard conditions that reach the widest range of foods.

It is the customer's responsibility to test our products for suitability for the intended end application whenever the food or packaging conditions are not covered by the test conditions. It

is also necessary to test the mutual compatibility between finished products and food substances, in particular the non-alteration of their organoleptic properties.

This declaration of conformity does not present any guarantee (either explicit or implied) if the product is subjected to thermal conditions other than those mentioned above. If the referred product is used in heat treatment conditions different from those mentioned, the user of the product must ensure that the product is technically suitable for use.

B. Overall Migration Limit (OML)

A representative sample was tested in independent laboratory did not exceed the limit of 10 mg/dm² for overall migration, for the food simulants (representative of all kind of foods) and teste conditions:

Table 1 – Results of migration testing (Test report N° 35543)

| Simulant | Test Conditions | Limit | Results |
|------------------------------------|------------------------|--------------|--------------------------|
| Simulant A 10% ethanol (v/v) | 10 days 40°C ±1°C | 10 | < 2,0 mg/dm ² |
| Simulant B 3% acetic acid (m/v) | 10 days 40°C ±1°C | 10 | < 2,0 mg/dm ² |
| Simulant D2 Isooctane | 24 hours 40°C ±1°C | 10 | < 2,0 mg/dm ² |

C. Specific Migration Limits (SML), Restrictions and Specifications

According to the information provided by raw material suppliers regarding restricted substances, a representative sample of the worst possible exposure scenario produced by Finnco was tested in an independent laboratory and was found to comply with the established specific migration limits, as shown in the table below:

Table 2 – Results of migration testing (Test report N° 35251)

| Substance | CAS/REF | Simulant | Specification (mg/kg) | Results (mg/Kg) |
|---|---------------------------|----------------------|------------------------------|------------------------|
| 3-(3,5-Di-terc-butil-4-hidroxifenil)propionato de octadecilo (Irganox 1076) | - | Vegetable oil | 6 | <0.5(LQ) |
| 1,1,1 - trimethylolpropane | - | 10% ethanol (v/v) | 6 | <0,6(LQ) |
| | | 3% acetic acid (p/v) | 6 | <0,6(LQ) |
| | | Vegetable oil | 6 | <0,6(LQ) |
| 2,6-Di-terc-butil-p-cresol (BHT) | CAS 128-37-0 | 10% ethanol (v/v) | 3 | <2,0(LQ) |
| | | 3% acetic acid (p/v) | 3 | <2,0(LQ) |
| 1-Amino-3-amino-methyl-3,5,5-trimethylcyclohexane | REF 12670 | 10% ethanol (v/v) | 6 | < 0,019 (LD) |
| | | 3% acetic acid (p/v) | 6 | < 0,019 (LD) |
| | | Vegetable oil | 6 | < 0,38 (LD) |
| 2,6-Di-terc-butil-p-cresol (BHT) | REF 46640 CAS 128-37-0 | Vegetable oil | 3 | < 0,7 (LD) |

Table 3 – Results of migration testing (Test report N° 35251)

Conformity Declaration

| | Substance | CAS/REF | Specification (mg/kg) | Results (mg/Kg) |
|--------------------------------|---|-------------------------|-----------------------|-----------------|
| Primary aromatic amines (PAAs) | o-Dianisidine | CAS 119-90-4 | ND (LD = 0,002) | <0,002 (LQ) |
| | o-toluidine | CAS 95-53-4 | ND (LD = 0,002) | <0,002 (LQ) |
| | 2-methoxy-5-methylaniline | CAS 120-71-8 | ND (LD = 0,01) | <0,002 (LQ) |
| | 4,4'-methylenedi-o-toluidine | CAS 838-88-0 | ND (LD = 0,002) | <0,002 (LQ) |
| | 4,4'-methylenedianiline | CAS 101-77-9 | ND (LD = 0,002) | <0,002 (LQ) |
| | o-Anisidin | CAS 90-04-0 | ND (LD = 0,002) | <0,002 (LQ) |
| | 2,4,5-trimethylaniline | CAS 137-17-7 | ND (LD = 0,002) | <0,002 (LQ) |
| | Benzidine | CAS 92-87-5 | ND (LD = 0,002) | <0,002 (LQ) |
| | 4,4'-Diaminodiphenyl Ether | CAS 101-80-4 | ND (LD = 0,002) | <0,002 (LQ) |
| | 4-Aminoazobenzene | CAS 60-09-3 | ND (LD = 0,002) | <0,002 (LQ) |
| | 4,4'-Methylene-bis(2-chloroaniline) | CAS 101-14-4 | ND (LD = 0,002) | <0,002 (LQ) |
| | 2,4-Diaminotoluene | CAS 95-80-7 | ND (LD = 0,002) | <0,002 (LQ) |
| | 4-Chloro-2-methylaniline | CAS 95-69-2 | ND (LD = 0,002) | <0,002 (LQ) |
| | 2-Amino-6-ethoxynaphthalene | CAS 293733-21-8 | ND (LD = 0,01) | <0,002 (LQ) |
| | m-Phenylenediamine + P-Phenylenediamine | CAS 108-45-2 + 106-50-3 | ND (LD = 0,01) | <0,002 (LQ) |
| | 2,4-Dimethylaniline | CAS 95-68-1 | ND (LD = 0,01) | <0,002 (LQ) |
| | 3,3'-Dimethylbenzidine | CAS 119-93-7 | ND (LD = 0,002) | <0,002 (LQ) |
| | 2-Amino-4-nitrotoluene | CAS 99-55-8 | ND (LD = 0,002) | <0,002 (LQ) |
| | 2,6-Diaminotoluene | CAS 823-40-5 | ND (LD = 0,01) | <0,002 (LQ) |
| | 4-amino-2'3-dimethylazobenzene | CAS 97-56-3 | ND (LD = 0,002) | <0,002 (LQ) |
| | 3,3'-Dichlorobenzidine | CAS 91-94-1 | ND (LD = 0,002) | <0,002 (LQ) |
| | 2,6-Dimethylaniline | CAS 87-62-7 | ND (LD = 0,01) | <0,002 (LQ) |
| | 4-Amino-3-chlorophenol | CAS 399-95-1 | ND (LD = 0,01) | <0,002 (LQ) |
| | 2-Naphthylamin | CAS 91-59-8 | ND (LD = 0,002) | <0,002 (LQ) |
| | 4-methoxy-m-phenylenediamine | CAS 615-05-4 | ND (LD = 0,002) | <0,002 (LQ) |
| | Aniline | CAS 62-53-3 | ND (LD = 0,01) | <0,002 (LQ) |
| | 4-Chloroaniline | CAS 106-47-8 | ND (LD = 0,002) | <0,002 (LQ) |
| | 4-Aminodiphenyl | CAS 92-67-1 | ND (LD = 0,002) | <0,002 (LQ) |
| 4,4'-Diaminodiphenyl sulfide | CAS 139-65-1 | ND (LD = 0,002) | <0,002 (LQ) | |
| Sum of Primary Aromatic Amines | | | ND (LD = 0,01) | <0,002 (LQ) |
| Total aromatic amines | | | ND (LD = 0.01) | <0,004 (LQ) |

Table 4 – Results of migration testing (Test report N° 35251)

| | Substance | Specification (mg/kg) | Results (mg/Kg) |
|-------------|-----------------|-----------------------|-----------------|
| Lanthanides | Europium (Eu) | 0,05 | <0,01 (LQ) |
| | Terbium (Tb) | 0,05 | <0,01(LQ) |
| | Lanthanum (La) | 0,05 | <0,01(LQ) |
| | Gadolinium (Gd) | 0,05 | <0,01 (LQ) |

D. REACH compliance

Finnco Iberflex – Papéis Transformados, S.A. hereby provides information relating to the requirements set out in Regulation (EC) n. ° 1907/2006 of the European Parliament and of the Council, of 18 December, concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

As part of our activity, Finnco Iberflex – Papéis Transformados, S.A. is integrated in the chain of information required by REACH, as a downstream user, making sure along with our suppliers of the existence of pre-registration and registration of substances (when applicable), as well as ensuring that these do not contain substances of high concern in concentrations $\geq 0.1\%$ (w/w), which are defined in Annex XIV of Regulation.

By the analysis of the compliance statements provided by our suppliers, we confirm that the substances included in the Candidate List of "Substances of Very High Concern" (SVHC) mentioned in the same regulation, updated on June 25, 2025 and described in the link: <https://echa.europa.eu/pt/candidate-list-table> , are not intentionally added to the products we provide, thus not being expected its presence in concentrations $\geq 0.1\%$ (w/w) in its composition.

Updates to this list will be duly considered and, if it is found that any of the substances reported to be present in the composition of our products, we will contact to inform of this.

This statement refers only to products in their original form, as provided by Finnco Iberflex. and does not extend to any subsequent changes.

E. Dual use additives

According to raw material supplier declarations, the product does not contain any additives that are subject to restrictions in food as referred to in Article 11.3 of EU Regulation 10/2011 (including current amendments). However, this product has not been tested for the presence of these substances.

F. Absence of substances and chemicals

Finnco Iberflex - Papéis Transformados, S.A. states that, according to information provided by its raw material suppliers, in the manufacture of the above product, the following substances are not used or intentionally added, and are not expected to be present:

Bisphenol A (BPA)

Based on the available information on the raw-materials used in the production of the films, we deem that Bisphenol A (BPA) is neither used nor intentionally added in their formulations. However, the raw-materials as well as the film have not been tested for this substance.

Food Allergens

The food ingredients listed in the Annex II of European Directive 1169/2011/EC, are not used in the manufacture of or formulation of this product. However, this product has not been tested for the presence of these substances.

Genetically Modified Organisms (GMO)

Additives derived from Genetically Modified Organisms (GMO's) are not intentionally used in the manufacture of or formulation of this product.

Non-intentionally added substances (NIAS) and degradation products

This information is based on our current state of knowledge and the results of tests performed for the worst-case finished product scenario.

Table 5 – Results of NIAS test (Test report 23-4196)

| CAS | Substance | Potential specific migration (mg/kg food) | SML Reg. 10/2011 (mg/kg food) |
|-------------|--|---|-------------------------------|
| 77-90-7 | Tributyl-O-Acetylcitrate | 0.200 | Listed without SML |
| 60-33-3 | Linoleic acid | 0.004 | Listed without SML |
| 112-84-5 | Erucamide | 0.030 | Listed without SML |
| 71-23-8 | 1-Propanol | 0.270 | Listed without SML |
| 78-83-1 | 1-Propanol, 2-methyl- | 0.013 | Not listed |
| 71-36-3 | 1-Butanol | 0.025 | Listed without SML |
| 107-98-2 | 2-Propanol, 1-methoxy- | 0,606 | Not listed |
| 109-60-4 | n-Propyl acetate | 0.007 | Not listed |
| 1569-02-4 | 2-Propanol, 1-ethoxy- | 0.432 | Not listed |
| 625-54-7 | Propane, 2-ethoxy- | 0.016 | Not listed |
| 66-25-1 | Hexanal | 0.006 | Not listed |
| 872513-20-7 | 1-Heptene, 2,6,6-trimethyl- | 0.006 | Not listed |
| 10059-13-9 | 2-Undecanethiol, 2-methyl- | 0.005 | Not listed |
| 41446-60-0 | 7-Tetradecene, (Z)- | 0.006 | Not listed |
| 108-87-2 | Cyclohexane, methyl- | 0.21 | Not listed |
| 1640-89-7 | Cyclopentane, ethyl- | 0.09 | Not listed |
| 112-23-2 | Formic acid, heptyl ester | 0.08 | Not listed |
| 108-88-3 | Toluene | 0.11 | Not listed |
| 150-46-9 | Triethyl borate | 0.11 | Not listed |
| 111-65-9 | Octane | 0.21 | Not listed |
| 111-84-2 | Nonane | 0.14 | Not listed |
| 301-02-0 | 9-Octadecenamide, (Z)- | 0.83 | Listed without SML |
| 199685-42-2 | Dodecyl acrylate | 0.18 | Not listed |
| 6607-34-7 | 1.4.7-trioxacyclotridecane-8.13-dione | 0.200 | Not listed |
| no CAS | cyclic oligoester Diethyleneglycol- adipic acid-Diethyleneglycol-adipic acid | 0.011 | Not listed |
| no CAS | cyclic oligoester Diethyleneglycol-adipic acid- propyleneglycol-adipic acid | 0.034 | Not listed |
| no CAS | cyclic oligoester ethyleneglycol- adipic acid-1.4- butanediol-adipic acid | 0.017 | Not listed |
| no CAS | cyclic oligoester propyleneglycol adipic acid- propyleneglycol-adipic acid | | Not listed |
| 126-73-8 | Tributyl phosphate | 0.060 | Not listed |
| 126-71-6 | Triisobutyl phosphate | | Not listed |
| 77-94-1 | Tri-n-butyl citrate | 0.016 | Not listed |
| 95906-11-9 | Tris(2.4-di-tert-butylphenyl)phosphate | 0.013 | Not listed |

In sample tested was find the compound 2-Propanol,1-methoxy- (0,606 mg/kg food) which is classified as Cramer Class III since the semi-quantification is above 0,09 mg/kg food, so an evaluation has been performed based on the structure and activity of molecule. Based on

toxicological data the SML the self-derived Specific Migration Limit is established at 60 mg/kg food. This value was derived according to EU 10/2011 standards. With this SML, no further investigations are required.

The results obtained for the analyses of the NIAS with the operative and instrumental conditions adopted, do not highlight critical aspects to consider the material not suitable for coming into contact with food.

Heavy metals

In accordance with Regulation (EU) 2023/195, an independent laboratory tested a representative sample of the worst possible exposure scenario produced by Finnco and confirmed its compliance with the established specific migration limits, as shown in the table below:

Table 6 – Results of migration testing (Test report N° 35251)

| Heavy metals | Specification (mg/kg) | Results (mg/Kg) |
|----------------|-----------------------|-----------------|
| Cadmium (Cd) | ND (LD = 0,002) | <0,0005(LQ) |
| Manganese (Mn) | 0,6 | 0.013 |
| Arsenic (As) | ND (LD=0,01) | <0,005(LQ) |
| Copper (Cu) | 5 | <0,015(LQ) |
| Mercury (Hg) | ND (LD=0,01) | <0,0005(LQ) |
| Zinc (Zn) | 5 | <0,015(LQ) |
| Iron (Fe) | 48 | 0.036 |
| Nickel (Ni) | 0,02 | <0,005(LQ) |
| Cobalt (Co) | 0,05 | <0,01(LQ) |
| Chromium (Cr) | ND (LD=0,01) | <0,005(LQ) |
| Barium (Ba) | 1 | <0,05(LQ) |
| Lead (Pb) | ND (LD=0,01) | <0,006(LQ) |
| Aluminum (Al) | 1 | 0.063 |
| Antimony (Sb) | 0,04 | <0,015(LQ) |
| Lithium (Li) | 0,6 | <0,015(LQ) |

Phthalates

Phthalates are not used in the manufacture of or the formulation of this product. However, this product has not been tested for phthalates.

Nanomaterials

NANOMATERIALS (defined as a natural, incidental or manufactured material, containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm - 100 nm.) are not used in the manufacture of or the formulation of this product. However, this product has not been tested for the presence of these chemical substances.

Styrene

According to raw material supplier declarations, the product does not contain styrene. However, this product has not been tested for the presence of these substances.

Important Note: Substances are not intentionally incorporated and not expected to be present, however their absence has not been determined by specific chemical analysis on the products supplied and therefore the presence of traces such as impurities or others cannot be excluded.

This declaration is based on our latest knowledge and has been updated as of the date of issuance. All information contained herein reflects the current state of our understanding and may be subject to future revisions as new data or applicable regulations emerge.

Samora Correia, 23rd July 2025

A handwritten signature in blue ink that reads 'Tânia Figueiredo'.

(Quality Manager,
Compliance and Safety)