

Supplier's Declaration of Conformity for Plastic Articles (containing recycled material)

Supplier:

SHB GmbH
Roßfelder Str. 64
74564 Crailsheim
Germany

We hereby confirm that the **uncolored standard items** we supply, made from **plastics with recycled content or made from recycled raw materials (PE, PP, PET) (PE, PP, PET)**, comply with the legal regulations listed below in their currently valid versions.

These statements are based on current knowledge and information provided by upstream suppliers. Plastic products containing recycled content are assessed on a risk-based basis due to material-specific variations. Compliance is evaluated based on available supply chain information and appropriate quality assurance procedures. Continuous monitoring is conducted as part of the supplier evaluation and quality assurance processes.

Masterbatches are used for the final coloring of the articles; their compliance (particularly regarding the specific migration limits and requirements set forth in Annex II of Regulation (EU) No. 10/2011) is confirmed by respective masterbatch manufacturers' declarations of conformity. These product-specific documents supplement this declaration and are to be considered as independent evidence.

1. Applicable laws and regulations

According to information provided by our suppliers, the raw materials and additives used comply, in particular, with the requirements of the following directives, as currently in force:

- Regulation (EU) No. **1223/2009** Cosmetics Regulation
- Regulation (EU) No. **1907/2006 (REACH)** including the current list of candidates (SVHC)
- Directive **94/62/EG** – Packaging and packaging waste -> Valid until the PPWR takes effect on August 12, 2026; national transitional regulations and implementation requirements must be reviewed separately
- Regulation (EU) Nr. **2025/40 (PPWR)** – Packaging and Packaging Waste Regulation -> Effective as of August 12, 2026
- Regulation (EU) No. **2022/1616** – Recycled plastic materials and articles intended for food contact (for regulatory purposes only; no approval for direct food contact is granted)

2. Material compliance / Migration

- Since there is currently no specific EU framework regulation governing materials and articles intended to come into contact with cosmetic products, the safety assessment of the plastic materials used is based—to the extent that it is technically and regulatory feasible—on selected requirements for food contact materials set forth in Regulation (EU) No. 10/2011.
- Based on this and according to current knowledge, the product qualities supplied by SHB are suitable **exclusively as primary packaging material for cosmetic products and for their intended use**, provided they are used properly and within the specified scope of application. This does not, however, imply suitability for direct contact with food.

SHB GmbH

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Amtsgericht Ulm | HRB 722553 | Geschäftsführer: Kim-Nadine Stolle, Jens-Olaf Stolle,

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- The assessment of the materials used is based on the available supplier information and, to the extent applicable to their intended use as cosmetic packaging, is guided by the requirements of Regulation (EU) No. 10/2011:
 - **Overall Migration Limit (OML) von 10 mg/dm²** as a benchmark,
 - **Specific Migration Limit (SML)** for restricted substances listed in Annexes I and II, insofar as they are relevant to the raw materials used and the intended scope of application.
- The requirements for **metals and metal compounds** set forth in **Annex II of Regulation (EU) No. 10/2011** (in particular lead, cadmium, mercury, and hexavalent chromium) are assessed based on the available supplier information and quality assurance procedure.

The evaluation of raw materials used with regard to migration-related requirements is based on available supplier information and appropriate quality assurance procedures. Upon request, product-specific determination of OML and SML values can be performed externally in accordance with the testing conditions defined in Regulation (EU) No. 10/2011. Responsibility for the conformity of the final product lies with the respective distributor.

3. Additional Regulatory Statements

Our products contain:

- **NO SVHC substances** from the current REACH Candidate List in concentrations exceeding 0.1% by weight (w/w), relative to the respective component,
- **NO Phthalates, bisphenols (including BPA), PAHs, asbestos, latex** oder **nanomaterials**, to the extent that this can be determined based on the available supplier information,
- Based on current knowledge, **PFAS** are **not intentionally added**. The assessment is based on available supplier information and risk-based analytical testing, to the extent that such testing is required due to the material's origin or customer requirements
- **NO dual-use additives** as defined in Regulations (EC) No. **1333/2008** and **1334/2008**
- **•NO Animal Contents**

4. Supplier's Declaration of Conformity Regarding Materials in Accordance with (EU) 2025/40 (PPWR)

- **Article 5 Heavy Metals:**

The total amount of lead, cadmium, mercury, and hexavalent chromium present in the packaging or its components does not exceed the limit of **100 mg/kg**.

- **Article 5 PFAS:**

According to the supplier and material information currently available, the plastic packaging supplied does not contain any intentionally added PFAS. The assessment of the requirements under Article 5 of Regulation (EU) 2025/40 (PPWR) is based on the available material declarations and supplier confirmations, as well as risk-based analytical testing, where necessary. A general batch-specific PFAS test is not part of this declaration unless specifically agreed upon.

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- **Obligation to provide information pursuant to Article 16 PPWR:**

In addition to this declaration, we provide our customers, upon request, with the available technical information to the extent necessary to support the downstream conformity assessment and the obligations of the distributor pursuant to Regulation (EU) 2025/40, in particular Article 39 and Annex VIII

The following technical documents are available upon request: technical drawings, product-specific specifications

5. International and supplementary standards

The materials used also comply with—where applicable:

- the recommendations of the **BfR** (z. B. BfR IX),
- **FDA CFR 21 §177.1520**,
- **EN 71-3** (Migration of certain elements),
- **RoHS-Directive 2011/65/EU**.

6. Conditions of use

According to the information provided by the suppliers, the recycled materials used do not have approval under food law in accordance with Regulation (EU) 2022/1616 for recycled plastic materials and articles intended to come into contact with food. Therefore, no declaration of conformity, suitability, or approval is made regarding the recycled materials used or the finished product for direct contact with food.

The manufactured products are intended only for use as packaging materials or components for cosmetic products. There are currently no specific plastic regulations for cosmetic packaging in the European Union comparable to Regulation (EU) No. 10/2011 for food contact materials. In practice, the safety assessment of the materials used is therefore often based on the requirements for food contact materials, without this implying that the end product is approved for food contact.

It is the responsibility of the customer or the distributor of the finished product to verify the suitability of the product for the intended application and to ensure compliance with all applicable legal and regulatory requirements.

7. Change Management

Any changes to the composition, the raw materials used, or the legal or regulatory assessment that may affect the content of this statement will be communicated to our customers without request as part of our duty to provide information.

8. Traceability

The traceability of the product in accordance with Regulation (EC) No. 1935/2004 is ensured by providing the respective order number. If available, batch or production information can also be used for traceability purposes.

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9. Suitability for recycling:

Plastics made of PE, PP, and PET are generally recyclable. The assessment of recyclability is based on the 'Minimum standard for measuring the recyclability of packaging subject to system participation' issued by the Central Agency Packaging Register (Stiftung Zentrale Stelle Verpackungsregister) in its currently valid version (currently the edition dated August 28, 2025).

The information provided above is based on our current knowledge and the information provided to us by our suppliers. It does not relieve the user of the obligation to independently verify the suitability of the products for their intended use and compliance with all applicable legal and regulatory requirements. The recommended processing and application conditions must be observed during processing and use. No legally binding assurance of specific properties or warranty regarding the product's suitability for a specific application is hereby provided.

Fabian Siegl

i.A. Fabian Siegl

Qualitätssicherung / Quality Assurance

Crailsheim, 18. Mai 2026

SHB GmbH

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