

Subject: Regulation (EU) 2025/40 – PPWR – Packaging Compliance Status

Dear Sirs,

Following up on your requests regarding Regulation (EU) 2025/40 on packaging and packaging waste (PPWR),

Regulation (EU) 2025/40 introduces new requirements applicable to packaging placed on the European Union market, with the aim of reducing its environmental impact and promoting, among other things, recyclability, recycled content, minimization, and proper end-of-life management.

In view of the application of the Regulation, our company has initiated an internal compliance process aimed at verifying the conformity of the packaging used for the products we commercialize, taking into account both packaging purchased from European Union suppliers and packaging related to products originating from third countries.

In particular, the verification concerns the packaging used for the packing and shipping of our products, such as cardboard boxes, labels, pallets, and stretch film, as well as any packaging already present on imported products and subsequently placed on the European Union market.

As part of this process, we have requested from our suppliers the information and documentation necessary to verify the compliance of the packaging with the applicable requirements of the PPWR, including, where provided for and applicable, the relevant EU declarations of conformity and supporting technical documentation.

The collection and verification of such documentation are currently ongoing, also considering that part of our supplies comes from non-EU countries and that some products are commercialized in their original packaging, while others are repacked by our company.

This communication is therefore intended to provide an update on the status of our compliance process and does not constitute an EU declaration of conformity pursuant to Article 39 and Annex VIII of Regulation (EU) 2025/40 for all packaging used and commercialized by our company.

Our objective is to ensure that the packaging used for our products complies with the PPWR requirements applicable at the time they are placed on the market and that the relevant documentation is available and properly verified.

For packaging and products subject to specific transitional provisions, the relevant provisions of the Regulation will be applied depending on the date they are placed on the market and the applicable requirements.

We will continue to monitor the evolution of the European regulatory framework, including any delegated acts, implementing acts, harmonized standards, and applicable technical specifications, and we will update our procedures and related documentation based on regulatory developments.

Once the collection and verification of the necessary information are completed, we will be able to provide, where requested and applicable, the documentation relating to the compliance of specific packaging.



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Thanking you for your cooperation and the trust you have placed in us, we remain at your disposal for any further clarification.

Best regards,

Pieve Emanuele, 14/09/2026

Kilton Srl