



Statement: Obligations under the Packaging Act (VerpackG, VerpackDG) and the EU Packaging Regulation (PPWR)

Dear Sir or Madam,

thank you very much for your enquiry regarding the implementation of the Packaging Act (VerpackG), the future EU Packaging Regulation (Regulation 2025/40/EU) (PPWR) and the national implementing regulation (VerpackDG), to which we are pleased to respond as follows:

Our company fulfils its obligation to comply with the relevant environmental regulations and to continuously improve environmental protection with commitment and motivation.

Three sets of regulations are currently applicable and relevant to the subject of packaging and packaging waste in Europe and Germany:

- 1) VerpackG (valid until August 2026): The German Packaging Act (Act on the Placing on the Market, Take-Back and High-Quality Recycling of Packaging (Packaging Act – VerpackG)),
- 2) PPWR (in force in the EU since February 2025): Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste. The provisions are to be applied in parts in all EU Member States from 12 August 2026.
- 3) VerpackDG: The Packaging Law Implementation Act (VerpackDG) aligns the national legal framework for packaging waste with the PPWR.

We would like to provide you with the following information regarding packaging:

Our company is subject to the regulations; we are an economic operator in a defined area within the meaning of the new definitions set out in the PPWR.

We naturally comply with the obligations under the PPWR, which include, for example:

- The minimisation requirement (Art. 10 PPWR),
- compliance with sustainability requirements, including substance bans (Art. 5 et seq. PPWR),
- reusability and recyclability (Art. 6 PPWR),
- registration in the manufacturers' register (Art. 44 PPWR),
- Labelling and information requirements (Art. 12 PPWR),
- Due diligence obligations, in particular checks in the upstream supply chain (Art. 19 PPWR)

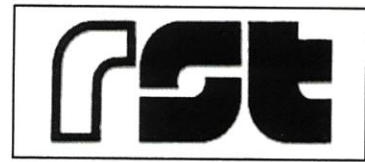
We are closely monitoring the planned national implementation of the PPWR and are currently identifying any future requirements that may have changed,

We are currently assessing the extent to which we are affected by the significantly more far-reaching and extensive obligations as a producer under Article 15 (conformity assessment procedures, EU declarations of conformity, preparation of technical documentation):

- in accordance with Recital 76 of the PPWR, we are not experts in packaging – we are not familiar with the design and manufacturing processes of our packaging
- in accordance with Article 21 of the PPWR, we do not alter the existing characteristics of the packaging, meaning that we do not compromise the packaging's conformity,

During supplier approval and goods receipt, we exercise due diligence to ensure compliance with the requirements.

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Where non-conformities are identified, we have established standard QM processes for corrective and preventive actions in accordance with the PPWR.

In the context of market surveillance measures (e.g. regulatory inspections), we cooperate with the relevant authorities and provide the documents required under the PPWR.

In accordance with Article 19(3) of the PPWR, there are confidentiality obligations and severely restricted obligations to provide information regarding internal documents and evidence. These are, in principle, reserved for the supervisory authorities,

Furthermore, in the context of the current environmental policy focus on the circular economy, we adhere to the long-established waste management principle (prevention, reduction, recycling, disposal) in relation to our packaging as well.

As part of our internal organisational processes, we have implemented internal procedures and controls to ensure that these processes are carried out pragmatically and in compliance with the law in areas such as procurement, production and sales.

We hope that the information provided above has given you a clear and comprehensive understanding of the implementation of the PPWR.

If you require further environmental information, please do not hesitate to contact us.

Kind regards

(Management director)

A handwritten signature in blue ink is positioned to the right of the text '(Management director)'. The signature is stylized and appears to be a cursive representation of a name.