

GENERAL DECLARATION OF COMPLIANCE WITH REGULATION (EU) 2025/40 ON PACKAGING AND PACKAGING WASTE (PPWR)

1. Company Identification

ZPS – FRÉZOVACÍ NÁSTROJE a.s.
třída Tomáše Bati 5334
760 01 Zlín
Czech republic
Company ID No.: 46966650

2. Status of the Company

ZPS – FRÉZOVACÍ NÁSTROJE a.s. places packaged metalworking tools on the market of the European Union, including milling cutters, drills, taps, countersinks and other related products. In this context, the company is implementing measures to fulfil the obligations arising from Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste (PPWR), applicable from 12 August 2026.

3. Subject Matter of this Declaration

This declaration applies to packaging used by the company for the packaging, protection, transport and delivery of the company's products, in particular:

- plastic packaging and plastic packaging components,
- paper and cardboard packaging,
- wooden and particle-board transport packaging, including pallets and crates,
- where applicable, combined packaging assemblies consisting of multiple separate elements.

The specific packaging covered by this declaration is listed in Annex No. 1 to this document.

4. Company Declaration

ZPS – FRÉZOVACÍ NÁSTROJE a.s. declares that, for the packaging listed in Annex No. 1, it introduces and applies procedures aimed at ensuring compliance with the requirements of Regulation (EU) 2025/40 and related legislation to the extent corresponding to the function of such packaging, its material composition and intended use. Based on the available documentation and the internal review carried out as of the date of issue, the company has not identified, with respect to the packaging listed in Annex No. 1, any circumstances that would clearly indicate non-compliance with the requirements of Regulation (EU) 2025/40.

In particular, the company applies the following principles:

- minimisation of the weight and volume of packaging while maintaining the requirements for product protection, safe handling and transport,
- preference for materials corresponding to common recycling streams, in particular paper, cardboard and suitable plastic materials,
- restriction of the use of substances whose presence would be contrary to applicable legal requirements or would prevent proper handling of the packaging at the end of its life cycle,
- continuous collection and evaluation of information from suppliers of packaging and packaging components.

5. Technical and Supplier Documentation

The company continuously collects and keeps available technical and supplier documentation for the packaging concerned, in particular depending on the nature of the specific packaging:

- material specifications,
- supplier declarations of conformity and declarations relating to the materials used,
- information on chemical composition and requirements under REACH, where relevant,
- information necessary for assessing recyclability,
- other documentation relevant to assessing compliance with the requirements of the PPWR.

The company evaluates such documentation to a reasonable extent, taking into account its status as a manufacturer of a packaged product, not as a manufacturer of packaging material.

6. Recyclability and Packaging Design

For paper and cardboard packaging, the company proceeds on the basis that these are materials that are generally compatible with established collection, sorting and recycling streams, unless the specific design, surface treatments or combination of materials limit this property.

For plastic packaging, the company gives preference to solutions corresponding to current technical and legislative requirements, in particular with regard to the packaging design, the polymers used and their inclusion in common systems for collection, sorting and material recycling. When designing and selecting packaging, the minimisation of the weight and volume of the packaging is also taken into account while maintaining its protective function and its compatibility with existing recycling infrastructure.

7. Substance Requirements and Regulatory Compliance Monitoring

As part of its processes, the company monitors the relevant substance requirements applicable to the packaging used, arising from applicable legislation and supplier documentation, in particular with regard to restrictions on hazardous substances and information provided within the supply chain.

This declaration applies to packaging used for industrial products and is not intended as a declaration for packaging intended to come into contact with food, unless expressly stated otherwise for specific packaging.

8. Ongoing Updates

The company acknowledges that some of the requirements of Regulation (EU) 2025/40 will be further developed by implementing or subsequent acts of the European Union. For this reason, the company continuously updates its internal procedures, supplier requirements and related documentation in line with the development of legal and technical requirements.

9. Scope and Nature of this Declaration

This declaration constitutes a general statement of the company's approach to fulfilling the requirements of Regulation (EU) 2025/40 for packaging used by the company and is based on the documentation available to the company as of the date of its issue.

This Declaration does not constitute an individual EU Declaration of Conformity within the meaning of Article 39 of Regulation (EU) 2025/40 for each individual packaging unit, unless expressly stated otherwise.

This declaration does not replace individual technical specifications, test reports, material declarations or separate declarations issued by manufacturers or suppliers of specific packaging or packaging components.

10. Final Provision

ZPS – FRÉZOVACÍ NÁSTROJE a.s. undertakes, to a reasonable extent, to demonstrate the available documentation relating to the packaging concerned and to provide relevant information to authorised entities, customers or business partners where this follows from legal regulations, contractual requirements or a legitimate interest related to the fulfilment of obligations under the PPWR.

In Zlín, on 28 July 2026

On behalf of ZPS – FRÉZOVACÍ NÁSTROJE a.s.

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Jiří Švec, Vice-Chairman of the Board of Directors