



Statement of Compliance

General Product information

All products supplied by Reflex, unless otherwise stated, meet the following criterion:

- ◆ Paper materials come from virgin wood pulp, which only comes from sustainable forests.
- ◆ Raw base materials are suitable for the intended use and adhesives used comply with either or both of BfR XIV, XV or XXXI (Germany) and FDA 175.105 (USA) and EU derived Regulations.
- ◆ Silicons used comply with BfR XV.
- ◆ Inks and varnishes are safe for their intended use and comply with the EuPIA Exclusion Policy for Printing Inks and Related product. Where packaging supplied is intended for direct food contact suitable assurances have been provided to Reflex by our suppliers.
- ◆ Packaging supplied meets relevant legal requirements (see below) in the country of manufacture and where known, the county of use

(EC) No. 2023/2006/EC 'GMP Regulation' and Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulations 2019

From 1st August 2008, EC Regulation 2023/2006 came into force, affecting all within the food packaging chain. It lays down rules on Good Manufacturing Practice for materials and articles intended to come into contact with food with respect to Framework Regulation (EC) No. 1935/2004, specifying that appropriate quality assurance and control systems are established by all business operators in the food chain industry. Appropriate documentation is mandatory.

Reflex manufacturing sites are certified to the BRCGS Standard for Packaging Materials.

All raw materials used in our conversion processes are carefully selected and specified to ensure the highest product quality and consistency. Additionally, the used raw material batch numbers are traceable through our production processes.

Unless explicitly stated or requested, no post-consumer recycled materials are used in the manufacture of finished products.



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(EC) No. 1935/2004 ‘Materials and Articles for Food Contact’ and as amended by UK Law: Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulations 2019

Article 3 of Regulation 1935/2004 demands that materials and articles, which in their finished state are intended to come into contact with food, do not transfer their constituents to food in quantities which could endanger human health, bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics of the food.

For our products, GMP should ensure that raw material substances are not transferred into food by set-off or migration through the substrate after application.

(EU) No. 10/2011 ‘Plastic Materials and Articles for Food Contact’ and amends (LAST AMENDMENT 21/02/2025) and as amended by UK Law: Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulations 2019

This Regulation is a specific measure within the meaning of Article 5(1) of Regulation (EC) 1935/2004. This Regulation, and its amendments, establishes the specific rules for plastic materials and articles to be applied for their safe use and repeals Commission Directive 2002/72/EC.

Where appropriate, suitable migration tests, using relevant food simulants are independently tested, conversant on the type of foodstuff and the temperatures and shelf life of the product. Attention is drawn to the final paragraph of the Statement of Compliance regarding responsibility of the end or downstream user.

Packaging and Packaging Waste Regulation (PPWR) – (EU) 2025/40

Reflex is fully committed to meet all the requirements of the (EU) 2025/40, including Article 5; holding all relevant technical documentation; and updating such information if it changes.

(EU) 2025/40 places responsibility of the “manufacturer” i.e. the person/organisation placing the product on the EU Single Market which is usually the brand-owner, and not necessarily the organisation producing the packaging.

PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS)



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Per- and polyfluoroalkyl substances (PFAS) are a group of chemicals that includes PFOA, PFOS, GenX, and other chemicals used to manufacture many everyday household products since the 1940s. From 12th August 2026, (EU) 2025/40 places strict limits for INTENTIONALLY ADDED substances, including defined PPM limits for FOOD CONTACT MATERIALS.

PFAS chemicals are not intentionally added during the production process at Reflex sites, and our suppliers have confirmed they also do not intentionally add them. Therefore, compliance is demonstrated via chain of custody approach, and no additional analytical testing is required.

Reflex will continue to work with both suppliers and customers to both assist with the current requirements and additional requirements which take effect from 2028 onwards.

HEAVY METALS

Concentrations of lead, cadmium, mercury and hexavalent chromium in packaging and packaging components do not exceed 100 mg/kg.

MINIMISATION ASSESSMENT

Packaging needs to be designed so that its weight, shape and volume are minimal in relation to its function and such as assessment needs to be based on 'performance criteria in Annex IV of the Regulation.

Whilst Reflex can assist in such assessments it is the responsibility of the "manufacturer" i.e. the organisation placing the product on the EU Single Market to undertake such assessment.

RECYCLED CONTENT PERCENTAGE (POST-CONSUMER) WITH SUBSTANTIATING EVIDENCE

Unless otherwise statement, products do not contain post-consumer recycled content.

RECYCLABILITY

Packaging placed on the EU Single Market must be recyclable by 12th August 2026. However, pursuant to the deadline of 1st January 2030, EN13430:2004 applies. Reflex complies with EN13430:2004 which includes waste to energy options as well as recycling of packaging wherever possible.



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TEST REPORTS

Annex VII, which outlines the required technical documentation, lists testing as a *general type* of evidence to be provided "*where applicable*" - since our raw material suppliers and Reflex believe materials are not inherently exposed to heavy metals and PFAS, test reports are not applicable and we have, therefore, adopted a chain-of-custody approach.

FURTHER REQUIREMENTS

Reflex will continue to work with both suppliers and customers to both assist with additional requirements which take effect from 2028 onwards such as Recyclability Performance Assessments.

Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024:

The regulations apply to all obligated UK organisations that import or supply packaging.

You need to collect and report packaging data for a given year if all the following apply:

- you're an individual business, subsidiary or group (but not a charity)
- you have an annual turnover of £1 million or more,
- you were responsible for importing or supplying more than 25 tonnes of packaging to the UK market in the previous calendar year
- you carry out any of the packaging activities

Epoxy Derivatives

EU Regulation (EC) No 1895/2005 and Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulations 2019 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food is not applicable to Reflex Group self-adhesive laminates, flexible packaging and associated products. The regulation deals with coatings mainly in cans and metal closures, with restrictions for:

2,2-bis (4-hydroxyphenyl) propane bis (2, 3-epoxypropyl) ether, BADGE (CAS No 001675-54-3), and some of its derivatives.

Bis (hydroxyphenyl) methane bis (2, 3-epoxypropyl) ethers, BFDGE (CAS No 039817-09-9), other novolac glycidyl ethers, NOGE.

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Bisphenol

Bisphenol A (BPA) is not intentionally added to any of our products and complies with Commission Regulation (EU) 2024/3190, amending Commission Regulation (EU) 10/2011 and repealing Regulation (EU) 2018/213 and Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulations 2019.

Mineral Oils

UV curable inks and varnishes used in the manufacture of our products have no mineral oil content (in particular MOSH (mineral oil saturated hydrocarbon), MOAH (mineral oil aromatic hydrocarbon), or PAH (poly aromatic hydrocarbon)) intentionally added to them and meet all relevant requirements of Article 112 of Law No 2020-105.

Animal Derived Components (BSE/TSE)

One or more ingredients in the raw materials used to manufacture Reflex finished product may contain trace amounts of materials which have been synthesized from animal extracts, i.e., hydrolysis, etc. of animal fats (tallow) into fatty acids.

If used, the manufacturing process of the fatty acids includes a multi-step chemical treatment involving high temperatures, high pressures, and long residence times. These processing conditions greatly exceed the requirements as specified in Section 6.4 of the “Note for Guidance on minimising the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products” (EMA/410/01 Rev. 3 – July 1, 2011), adopted by the European Commission and published in the Official Journal of the European Union March 5, 2011 (2011/C 73/01).

Furthermore, materials or equivalent as defined by Article 10 of European Parliament and Council Regulation (EC) No 1069/2009 (or EU-derived legislation within UK law) are used as raw materials for the fatty acids. Thus, the tallow derivatives used in the manufacturing of this product are therefore considered compliant with the EMA Note for Guidance referenced above.



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Epoxidised soya bean oil (ESBO)

ESBO is often employed as a plasticizer and stabilizer in food packaging materials, such as cling films and food-grade PVC containers. Reflex products do not contain or come into contact with ESBO.

Kosher

One or more of the raw materials used in the manufacture of Reflex products may contain trace amounts that originate in whole or in part from animal sources. If used in the raw materials used to make our products, the animal sourced material(s) have been chemically altered from their original structure and have undergone significant chemical processing and is/are therefore considered synthetic.

Halal

Products supplied by Reflex are not Halal certified.

Raw materials used in the manufacture of our products may contain trace amounts that originate in whole or in part from animal sources. This raw material has been chemically altered from its original structure prior to addition to the manufacturing process for the materials used to make our products and is therefore considered synthetic.

Derived law (EC) No. 1907/2006 'REACH Regulation'

A separate Position Statement regarding REACH is available on request.

Limitations of Use

This Statement of Compliance describes the status of the product(s) specified under General Product Information. Since the conditions of use are outside our control and can vary widely the user must evaluate and determine whether the product is suitable for its intended application. If the product is intended for direct food contact or a hygiene sensitive product, the enclosed specification will detail any limitations on usage.



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It is the responsibility of the manufacturer, importer or distributor of food contact materials and articles, or those who place them in contact with food prior to sale, to ensure that their products comply with the appropriate legislation.

The user of the product (or downstream user, if applicable) is responsible for ensuring that the finished food package complies with applicable migration limits in the food itself under actual conditions of use. Furthermore, the packer is responsible for verifying possible interactions of the product(s) or its components with the foodstuffs (e.g. modification of odour, taste, consistency, migration etc.) which are to be checked prior to use and in function of the end-uses.

The Statement is reviewed at a minimum annually or if relevant changes occur.

Signed: *David Liversuch*

Last reviewed: 16th July 2026

Next scheduled: 15th July 2027