

Glaverbel Building
166 Chaussée de la Hulpe
1170 Brussels
BELGIUM
Tel +32 (0)2 676 9700

www.sappi.com

Dr. Christian Torborg
Regulatory Affairs Specialist
Tel +49 5181 77 744
Christian.Torborg@sappi.com

May 05, 2023

Declaration of Compliance

Sappi product name: Magno Gloss
Product description: Coated fine paper

1. General Information

Pulp composition

Magno Gloss is produced with a mixture of elementary (ECF) and totally chlorine free (TCF) bleached cellulose fibres. The production is based on virgin fibres only and no recycled fibres are used for pulp preparation. We further confirm that Magno Gloss is produced without intentional addition of any recycled materials.

Acid content/Chloride content

The pH of this product is above 7. The product can be described as neutral or slightly alkaline. It has not been tested for chloride content.

Storing and handling recommendations

Under appropriate storage conditions the functionality of this product is guaranteed for 12 months after supply. Appropriate storage conditions are defined as storage of the supplied reels and sheets in original packaging protected against direct sun light at an average climate ($\pm 10\%$) of 23°C, 50 % rel. humidity. Especially high storage temperatures, high ambient humidity and direct UV radiation should be avoided. In case of differences between storage climate and the ambient conditions during conversion the reels and sheets must be stored at least 24 h in original packaging, preferably 48 h near the conversion machine to make sure that the reels and sheets adopt the ambient temperature. This also holds for paper reels just supplied because temperature differences over the web width and running length might negatively affect the conversion process.

To avoid the buildup of rope marks and creases, as well as flatness deviations (in case of sheets) by moisture exchange with the environment, the original packaging, especially under humid climate conditions, should only be removed immediately before conversion. Also opened reels have to be appropriately repacked with a moisture barrier packaging.

2. Food Contact Status

Conditions for food contact

This product can be used at temperatures up to 90 °C (holding and reheating of food for maximum 2 hours) in accordance with XXXVI recommendation of the BfR. It can be used in direct contact with dry and fatty foodstuff in accordance with XXXVI recommendation of the BfR.

Compliance with (EU) No 1935/2004

This product complies with the requirements of Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. This product can be applied as packaging for foodstuffs.

Compliance with BfR recommendation XXXVI

This product is approved according to BfR recommendation XXXVI in its current version (1.2.2023).

Compliance with Foodstuffs and Animal Feed Code (LFGB)

This product is in compliance with the rules of the current version of the Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code (LFGB)).

Compliance with (EU) No 10/2011

This product is not directly applicable to Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, as it is not plastic.

Compliance with FDA requirements for food packaging

This product has not been assessed according to the demands of the Code of Federal Regulations, Foods and Drugs (FDA), 21 CFR Ch. 1 (current version of March 2023), §§ 176.170 and 176.180.

Compliance with the Swiss Ordinance on food packaging materials

This product fulfills the requirements stated in the Swiss Ordinance on Materials and Articles (SR 817.023.21), Part 9, Article 27. It solely contains virgin fibres and no recycled fibres.

Compliance with (EC) No 2023/2006

This product was manufactured in accordance with Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food. Full traceability of raw materials is possible through the IT systems. The producing mill has implemented a quality management system according to ISO 9001. The quality management system is externally certified.

French regulation Fiche MCDA n°4 (V02 – 01/01/2019)

Magno Gloss has not been assessed for compliance in regard to the French regulation Fiche MCDA n°4 (V02 – 01/01/2019).

3. Toy Safety

EU toy safety directive

This product meets the requirements of Directive 2009/48/EC of the European Parliament and of the Council on the safety of toys, including the latest amendments, for scraped-off toy materials regarding their chemical properties. It can be safely used in toys for children older than 3 years and for toys that

are not intended to be placed in the mouth.

Toy safety EN 71/3

This product has been tested and found to be in compliance with the demands of the latest version of the Toy Safety standard EN 71-3:2019+A1:2021: "Migration of certain elements".

Toy safety EN 71/9

This product has been tested and found to be in compliance with the demands of the Toy Safety standard EN 71 part 9:2005: "Organic chemical compounds". The formaldehyde concentration in accordance with EN 645 and EN 1541 was confirmed to be below the limit of 30 mg/kg.

4. Relevant legislation

Compliance with EC 1907/2006 (REACH)

The regulation EC No 1907/2006 (REACH) primarily addresses chemical substances, mixtures and articles being placed on the market in the European Union (EU) / European Economic Area (EEA). Registration requirements under the REACH regulation apply to substances and as such they do not apply to Magno Gloss being placed on the EU / EEA market by Sappi.

Any REACH registration obligations that apply to the raw materials (substances) being used in the manufacturing processes of our products are being met by our suppliers and we request confirmations from our suppliers that they have fulfilled those obligations.

To the best of our knowledge, no substance listed on either the Candidate List for Substances of Very High Concern (SVHC) nor any of those substances already listed in Annex XIV for Authorisation under REACH, are found in the products we are supplying to our customers at concentrations >0.1%. Amendments of the SVHC list up to and including January 17th 2023 have been considered.

Any information that needs to be passed down the supply chain in accordance with the provision of information requirements of the REACH regulation will be communicated to you separately where required and in the appropriate format, as regulated by Article 33 of EC 1907/2006.

Compliance with 94/62/EC (Packaging)

This product is in compliance with the Directive 94/62/EC on packaging and packaging waste, including latest amendments, regarding the content of heavy metals as specified in Article 11. The sum of the heavy metals CrVI, Pb, Cd, Hg is below 100 ppm.

Compliance with Directive 2011/65/EU (RoHS)

The substances restricted by EU-directive 2011/65/EC Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ROHS directive) and its amendments Directive (EU) 2015/863 and Directive (EU) 2017/2102 have not intentionally been added to the manufacturing process of Magno Gloss. They are not expected to be present above the maximum allowed thresholds levels.

Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Substances listed in the latest version of the Safe Drinking And Toxic Enforcement Act of 1986 Proposition 65 have not intentionally been added to the manufacturing process of Magno Gloss. Updates until and including April 21st, 2023 have been considered.

Canadian Environmental Protection Act

Substances listed in Canadian Environmental Protection Act, 1999 are not intentionally added to the manufacturing process of this product.

CONEG

This product is in compliance with the demands of the current version of the Model Toxics Legislation by the Source Reduction Council of CONEG regarding the content of heavy metals. The sum of the heavy metals CrVI, Pb, Cd, Hg is below 100 ppm.

5. Miscellaneous

BSE/TSE risk

Raw materials of animal origin classified as risk materials according to COMMISSION REGULATION (EC) No 1326/2001, Annex III, are not used during the manufacture of this product. For all processing aids, i.e. defoamers, we already have declarations of our suppliers available that specifically exclude a TSE risk. In detail, the respective suppliers confirmed, that during the production of respective raw materials and their precursors, the conditions outlined in EMEA/410/1, section 6.4., respectively in Annex I 3. of EU 722/2012 are applied.

Substances of animal origin

The presence of traces of substances of animal origin in this product cannot be fully excluded.

6. Information on end-of-life scenarios

Recyclability

Magno Gloss is fully recyclable in the waste paper stream. The product has not been tested for its repulpability properties, but to the best of our knowledge about the product composition, manufacturing process, and raw materials we are not aware of any limitations to its recyclability. To the best of our knowledge, the recycling code PAP 22 according to Annex II of 97/129/EC can be assigned to a hypothetical packaging consisting purely of above mentioned material.

Biodegradability

Magno Gloss has not been tested on biodegradability or compostability. Under the conditions of a compost heap or a well managed landfill site (sufficient air, moisture and heat) our coated paper would decompose into carbon dioxide and minerals, but without testing we can not estimate how long it takes.

Our coated papers do contain fossil polymer binders in quantities above 1%. We advise to favor paper recycling over composting in order to maximize the value and the lifecycle of the virgin fibres. If recycling is not possible, for example due to contamination or moisture, then composting or energy recovery are acceptable options.

7. Non-use of specific substances or materials

Genetically modified organisms

Genetically modified organisms are not intentionally added to the manufacturing process of this product.

MOSH/MOAH (mineral oil)

Mineral oil is not used as a paper raw material in the production of this grade. However, traces of substances originating from defoamers, stabilizers or other materials used during production may lead to a positive result in a MOSH-analysis.

Radioactive substances/Radiation

During the production of above mentioned paper grade no radioactive substances are intentionally added.

X-Ray measuring devices are installed in our paper machines in order to measure parameters like ash content and coating weight online. The ionizing effect of these measurements on the paper web can be considered to be negligible.

Anthraquinone

Anthraquinone (CAS 84-65-1) has not been added to the manufacturing process of Magno Gloss. Its nonpresence in the raw materials is screened regularly.

Nanomaterials

Raw materials or processing aids containing particles with one or more external dimensions in the nano range may be used in the manufacturing process of Magno Gloss. These particles would meet the definition of nanoparticles according to Commission Recommendation of 10 June 2022.

However, these particles are embedded in the paper matrix and are not expected to migrate.

Allergenes

No substances with allergenic hazard according to Annex II of EU 1169/2011 are intentionally added during the production of this product, except for wheat starch, which in turn may contain gluten.

Amendments of EU 1169/2011, namely Commission Delegated Regulation (EU) No 78/2014 and Commission Delegated Regulation (EU) No 1155/2013 have been considered.

Glycides

The product has not been tested for the presence of glycidyl fatty acid esters as well as glycidyl silanes, such as GLYMO or GLyEO. We do not intentionally add these chemicals to the manufacturing process and they are not expected to be present in the final product.

PFAS

Per- and polyfluoroalkyl substances (PFAS), defined as substances that contain at least one fully fluorinated methyl (CF₃-) or methylene (-CF₂-) carbon atom (without any H/Cl/Br/I atom attached to it), have not been intentionally added to the manufacturing process of this product. These substances are not part of the product formulation and they are not expected to be present in the product. The product meets the demands of Danish Order No. 681 of 25th May 2020, chapter 3, §8.

Persistent organic pollutants

None of the following substances listed in Annexes A, B, and C of the Stockholm Convention have been intentionally added during production of this product:

- Aldrin
- Chlordane
- Dieldrin
- DDT
- Endrin
- Heptachlor
- Hexachlorobenzene
- Mirex
- Toxaphene
- Polychlorinated biphenyls (PCBs) and terphenyls (PCTs)
- Dioxins and furans

None of the following substances listed in the amendments of Stockholm Convention Annexes A, B, and C in the COP decisions SC 4/10-4/18, SC 5/3, SC 6/13 have been intentionally added during production of this product:

- Chlordecone
- Alpha and beta hexachlorocyclohexane
- Lindane
- Hexabromobiphenyl, hexabromodiphenyl ether and heptabromodiphenyl ether
- Pentachlorobenzene
- Perfluorooctane sulfonic acid, its salts and perfluorooctane sulfonyl fluoride
- Tetrabromodiphenyl and pentabromodiphenyl ethers

None of the substances listed in Annexes I - IV in Regulation EU 2019/1021 are intentionally added during the production of the product.

Titanium oxides

Titanium oxides (CAS 13463-67-7, 1317-80-2, 1317-70-0) are not intentionally added. The substances are not part of the product formulation and they are not expected to be present in the product.

Optical brightening agents

Optical brightening agents (OBAs) are intentionally used during the manufacture of this product. These substances are used in accordance with respective BfR recommendations and FDA legislation.

PVDC

Polyvinylidene chloride (PVDC) is not added to the manufacturing process of Magno Gloss.

Sulfur

As far as it concerns content of sulfur species, Magno Gloss is expected to contain almost exceptionally sulphate species, which originate from the fiber base. Sulphates are not considered 'reducible sulfur species' according to Tappi T406 and therefore not expected to oxidize metals in direct contact. The amount of 'Reducible sulfur species' according to Tappi T406 is expected to be at trace levels and therefore below the threshold to cause oxidation.

Conflict minerals

No gold, tin, tantalum or tungsten, or their derivatives, such as coltran, cassiterite, columbite-tantalite or wolframite, as laid out in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, are added during the production of this product.

CMR Substances according to CLP legislation

During the production of this product, no substances classified as cancerogenic, mutagenic or toxic for reproduction according to CLP regulation EC 1272/2008 are intentionally added.

Wet strength agents

Wet strength agents have not been added to the manufacturing process of Magno Gloss.

Flame retardants

No flame retardants have been added to the manufacturing process of this product. We can confirm non-use of the following substances commonly used as flame retardants:

- Antimony trioxide CAS (1309-64-4)
- TBPH, Bis(2-Ethylhexyl)-3,4,5,6- tetrabromophthalate CAS (26040-51-7)
- TBB, 2-Ethylhexyl-2,3,4,5-tetrabromobenzoate CAS (183658-27-7)
- Chlorinated paraffins CAS (108171-26-2)
- TCPP, Tris(1-chloro-2-propyl) phosphate CAS (13674-84-5)
- HBCD, Hexabromocyclododecane CAS (3194-55-6)
- TBBPA, Tetrabromobisphenol A CAS (79-94-7)
- TCEP, Tris(2-chloroethyl) phosphate CAS (115-96-8)
- TDCPP, Tris(1,3-dichloro-2-propyl) phosphate CAS (13674-87-8)
- Deca-BDE, Decabromodiphenyl ether CAS (1163-19-5)
- Octa-BDE, Octabromodiphenyl ether CAS (32536-52-0)
- Penta-BDE, Pentabromodiphenyl ether CAS (32534-81-9)

TSCA Section 6

No substances listed under Section 6 of the US Toxic Substances Control Act have been intentionally added to the manufacturing process of this product and they are not expected to be present. At the time of the assessment the following persistent, bioaccumulative, and toxic chemical substances have been listed:

- PIP (3:1) - phenol, isopropylated phosphate (3:1) (CAS 68937-41-7)
- DecaBDE - decabromodiphenyl ether (CAS 1163-19-5)
- HCBd - hexachlorobutadiene (CAS 87-68-3)
- PCTP - pentachlorothiophenol (CAS 133-49-3)
- TTBP - 2,4,6-tris(tert-butyl)phenol (CAS 732-26-3)

Ethylene oxide-based substances

Neither ethylene oxide (CAS 75-21-8) nor poly(antimony ethylene glycoxide) (CAS 29736-75-2), nor polyethylene glycol (CAS 25322-68-3) has been intentionally added during production of this product. Defoamers containing ethoxylated alcohols may be added.

Endocrine disruptors

None of the substances listed in the lists I and III of the website <https://edlists.org/>, administered by The Danish Environmental Protection Agency, are intentionally added during production of this product.

Other substances

None of the following substances/substance classes have been intentionally added to the manufacturing process of this product:

- Adipates, including Bis(2-ethylhexyl) adipate (DEHA, CAS 103-23-1)
- Alkylphenols and their ethoxylates
- Anthraquinone (CAS 84-65-1)
- Antimony Tris(Ethylene Glycoxide) (CAS 29736-75-2)
- Asbestos
- Azodicarbonamide (CAS 123-77-3)
- BAC (CAS 63449-41-2)
- BADGE, BFDGE, NOGE
- Benzene (CAS 71-43-2)
- Benzophenones
- Bisphenols
- Cadmium, lead, mercury, chromium and compounds thereof
- Chlorine and other halogens (Fluorine, Bromine, Iodine)
- Cobalt and its compounds
- Creosote
- Cyanuric acid (CAS 108-80-5)
- DDAC (CAS 7173-51-5)
- Diisopropylnapthalenes (DIPNs)
- Dimethylfumarate (CAS 624-49-7)
- Dioxane (CAS 123-91-1)
- Disodium guanylate (CAS 5550-12-9)
- Epoxy resins
- Ethanol (CAS 64-17-5)
- Ethylene oxide (75-21-8)
- Formaldehyde
- Glyphosate (CAS 107-83-6)
- Glycol ethers
- GLYMO (CAS 2530-83-8), GLYEO (CAS 2602-34-8) and their reaction products, as well as other epoxy silanes
- Hexane (CAS 110-54-3)
- Inosinate (CAS 4691-65-0)
- Isopropyl alcohol (IPA) (CAS 67-63-0)
- Isopropylthioxanthone (ITX, CAS 5495-84-1, 83846-86-0)
- Melamine (CAS 108-78-1)
- Micas
- Monosodium glutamate (CAS 142-47-2)
- Natural rubber latex materials
- N-Ethyl-Toluenesulfonamide (CAS 8047-99-2)
- Nitrosamines, Nitrites, Nitrates
- N-Methylpyrrolidone (NMP) (CAS 872-50-4)
- 4-Nonylphenol (4-NP) (CAS 3050-88-2)
- Nonylphenoethoxylate (NPE, CAS 127087-87-0)
- Organic Peroxides
- Organotin compounds
- Orthophenylphenol (CAS 90-43-7)
- Partially hydrogenated terphenyls (HTPs)
- Pentachlorophenol (PCP)
- Pentanedione-2,4-titanium
- Perchlorates
- Pesticides and Fungicides
- Phenylalanin
- Phthalates

- Polycyclic aromatic hydrocarbons (PAHs)
- Polyvinylchloride (PVC)
- Primary aromatic amines and azo colorants which may cleave to form aromatic amines as listed in European regulation 1907/2006/EC (REACH)
- Radioactive materials, radioactive contamination
- Rayon
- Rice plant derived substances
- Seed-bearing parts of a flowering plant (fruits)
- Sodium Antimonate A (CAS 15432-85-6)
- TAA Titanium Acetylacetonate (CAS 17501-79-0)
- Toluene (CAS 108-88-3)
- Triclosan (CAS 3380-34-5)
- Tris(4-nonylphenyl, branched and linear) phosphite
- 2,2,4-Trimethyl-1,3-pentandioldiisobutyrate (CAS 6846-50-0)
- Vinyl chloride (CAS 75-01-4)
- Yeast
- TNPP, 4 NP and NPE

8. Disclaimer

This declaration is restricted to Magno Gloss in the state it is delivered by us. This information provided in this statement applies only for Magno Gloss and may not substitute necessary end use testing. Sappi shall not be liable for any damage or injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of the product for a particular application or end use. The information given in this statement has been verified by Sappi at the date of its publication and we shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available. Republishing this document is not permitted.