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Certification of Compliance Ardagh Glass Europe

1. Confirmation of compliance with food laws and regulations:

At Ardagh Glass Europe, we are committed to ensuring that our glass packaging complies with applicable food contact legislation and recognized food safety requirements in force at the time this declaration is issued.

The overview in table 12 is provided for informational purposes only and serve as a reference to relevant harmonized and country-specific legislation applicable to food contact glass packaging. The information reflects Ardagh Glass Europe's best knowledge and understanding at the date of issue of this Declaration of Conformity.

For countries outside the EU/EEA, compliance with EU legislation may be used as a technical reference framework; however, such compliance does not in itself guarantee regulatory acceptance, market access, or compliance with national requirements in the destination country. National legislation, import requirements, regulatory interpretations, and local enforcement practices may apply and should be assessed independently.

Ardagh Glass Europe assumes no liability for legislative changes, regulatory updates, differing regulatory interpretations, or enforcement practices occurring after the date of issue of this declaration. The company placing the product on the market in a given country remains solely responsible for verifying and ensuring ongoing compliance with all applicable legal and regulatory requirements. The intended use for the supplied glass containers is spirits, beverage, (sparkling) wine and food products. It also covers the use of printing inks.

2. Quality systems

All stages of processes are controlled and documented according to quality plans. The company owns functional Quality systems conforming with EN ISO 9001:2015 standard, Environmental Management system conforming ISO 14001:2015, ISO 45001:2018 standard, ISO 50001:2018 and a food/product safety management system conforming with FSSC 22000 V6, UNI EN 15593:2008 or BRCGS standard.

3. Good Manufacturing Practice (GMP Regulation)

Legal bases, regulations and directives:

- *Regulation (EC) No. 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food , as consolidated 16 March 2025*

We confirm that the glass packaging products manufactured by us are compliant with the above-mentioned GMP Regulation on good manufacturing practice for materials and articles intended to come into contact with food. We refer in particular to Article 5 (Quality assurance system), Article 6 (Quality control system) and Article 7 (Documentation).

4. HACCP declaration:

Legal bases, regulations and directives:

- *Regulation (EC) No. 852/2004 of 29 April 2004 on the hygiene of foodstuff*
- *German Food Hygiene Ordinance (LMHV) of 8 August 2007, (BGBl. I, No. 39) in the current, consolidated version.*
- *German Food and Feed Code (LFGB), 15 September 2021 (Federal Law Gazette (BGBl.) I, p. 4253), as amended most recently by Art. 2, Clause 6 of the Act of 20 December 2022 (BGBl. I, p. 2752).*
- *Uni EN 15593:2008*

We confirm, as a supplier of high-quality packaging for the food industry, that we have implemented an HACCP system which is specifically adapted to our production process in accordance with the principles of the above-mentioned laws and regulations. HACCP (Hazard Analysis and Critical Control Points) as mandated by the EC Food Hygiene Regulation (852/2004/EC) has been adopted by companies in the food industry as part of the quality assurance process.

5. Traceability

Legal bases, regulations and directives:

- *Article 17 of EC Regulation No. 1935/2004 of 27 October 2004 on materials and articles intended to come into contact with food*

We confirm that we comply with traceability requirements for materials and articles intended to come into contact with food in accordance with EC Regulation No. 1935/2004.

EC Regulation No.1935/2004 requires, inter alia, that traceability of materials and articles intended to come into contact with food should be ensured at all stages in order to facilitate control, the recall of defective products, consumer information and the attribution of responsibility.

Each pallet of packed glass has a unique identification on a pallet ticket that indicates that the glass conforms to specification and is subject to positive release after daily management review of production.

The unique pallet tickets enable product to be traced through the warehouse and distribution system from manufacture through to delivery. This means that each pallet can be traced back to production records. Individual containers can be marked with a code that identifies the production line, date, and time of manufacture. This means that even after filling, an individual Container can be traced back to a pallet and to the date and time of manufacture and hence to the relevant production records.

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6. Glass composition and migration of substances into foods

Legal bases, regulations and directives:

- EC Regulation No. 1935/2004 of 27 October 2004 on materials and articles intended to come into contact with food
- DIN ISO 719, version 2021-12; Hydrolytic resistance of glass grains at 98 degrees C, method of test and classification
- Italy, DM 21/03/1973 GU n° 104 20/04/1973 All IV sez 1, DM 26/04/1993 GU n° 162 13/07/1993 All III, DM22/07/1998, GU 228 30/09/1998
- DGCCRF Verre - Cristal - Céramique - Vitrocéramique - Objets émaillés du 01/05/2016

We confirm that the glass manufactured by us is conventional soda-lime glass which is tested in accordance with DIN ISO 719. This test confirms that the produced glass containers correspond to hydrolytic class 3 on account of the fact that the hydrochloric acid (0.01mol/l) consumption per gram of glass grains does not exceed 0.85 ml.

We confirm compliance with the provisions of EC Regulation No.1935/2004 that under normal or foreseeable conditions of use, our glass packaging products do not transfer their constituents to food in quantities which could

- endanger human health or;
- bring about an unacceptable change in the composition of the food or;
- bring about a deterioration in the organoleptic characteristics thereof.

We conduct on regular intervals total migration and specific migration tests for Heavy metals (Pb, Cd, Cr VI, Hg) and for France the additional Heavy Metals (Al, As, Co) on our produced containers. As Ardagh's glass production plants use standard recipe's and coating materials, generic random Product tests are used for screening tests covering the separate plants and furnaces. Results show compliance with the regulations for over a decade.

7. Guideline for proof of compliance

Legal bases, ordinances and directives:

- *Regulation (EC) No. 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with foodstuffs and repealing Directives 80/590/EEC and 89/109/EEC (Official Journal of the European Union L 338/4 of 13 November 2004)*
- *German Consumer Goods Ordinance in the version promulgated on 23 December 1997 (BGBl. 1998 I, p. 5) in the current, consolidated version.*
- *Directive 94/62/EC on packaging and packaging waste and Directive (EU) 2018/852 amending Directive 94/62/EC (AnnexII). Replaced by EC 2025/40 PPWR from August 2026 onwards.*
- *Regulation (EC) No. 1895/2005 of 18 November 2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food (Official Journal of the European Union L 302/28 of 19 November 2005)*
- *DIN EN 13427: 2004-10: Packaging: Requirements for the use of European Standards in the field of packaging and packaging waste*

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Article 16 of Regulation (EC) No. 1935/2004 states that materials and articles covered by the specific measures must be accompanied by a written declaration stating that they comply with the rules applicable to them.

These specific measures are set out in Regulation (EC) 1935/2004, i.e. specific rules and quality requirements for food contact materials made of plastics, ceramics and regenerated cellulose. The specific measures are implemented in the national consumer goods ordinances and the Euro-pean Regulation on the restriction on the use of certain epoxy derivatives also applies.

There are no specific legal regulations and therefore no obligation to issue declarations of compliance for food contact materials (e.g. food packaging) made from other materials, such as glass, steel, aluminum, paper and corrugated board. Only the general requirements of Regulation (EC) No. 1935/2004, such as good manufacturing practice, inertness and traceability, apply.

8. REACH declaration

Legal bases, regulations and directives:

- *Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) in the current, consolidated version.*

We confirm that all raw materials on the supply chain side which are necessary to our glass manufacturing process comply with the requirements of the REACH Regulation, particularly with regard to registration.

Products manufactured by the glass industry (e.g. glass containers for packaging use) are articles as defined in the REACH Regulation because their shape, surface or design determines their function to a greater degree than their chemical composition. Therefore, these articles are not subject to mandatory registration requirements under REACH.

9. Notification obligation for food contact materials

Legal bases, regulations and directives:

- *Regulation (EC) No. 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law.*
- *Consumer Goods Ordinance in the version published on 23 December 1997 (Federal Law Gazette 1998 I p. 5) in the current, consolidated version.*

The Consumer Goods Ordinance establishes a notification obligation for economic parties who manufacture, treat or place food contact materials on the market as finished products (e.g. the packaging industry). This activity must be reported to the competent authority.

We confirm that we comply with the notification obligation in accordance with § 2a of the Consumer Goods Ordinance.

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10. Information about non-glass substances

a. ALLERGENIC SUBSTANCES OR PRODUCTS

Legal bases, regulations and directives:

- Article 21 of Regulation (EU) No. 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of information to consumers through the labelling of certain substances or products causing allergies or intolerances makes reference to Annex II of the Regulation.
- Regulation (EU) No. 1169/2011 only pertains to foods. However, some food-labelling requirements will be applied in a harmonized manner across certain types of food packaging.

We confirm that the glass packaging which we supply contains none of the substances or products listed in Annex II. Thus, they are exempted from the labelling requirement.

Annex II contains a list of allergenic substances and products.

b. BISPHENOL A (BPA)

Legal bases, regulations and directives

- Regulation (EU) No. 2016/1179 of 19 July 2016 amending, for the purposes of its adaptation to technical and scientific progress, Regulation (EC) No. 1272/2008 (16 Dec 2008) on the classification, labelling and packaging of substances and mixtures (Official Journal of the European Union L 195 of 20.7.2016) considers Bisphenol A to be a reproductive toxicant and assigns it to the higher category of 1B “May damage fertility” (previously category 2 “Suspected of damaging fertility”). The Regulation entered into force on 9 August 2016 and is effective as of 1 March 2018.
- The European Commission also decided, in the sense of preventive consumer protection, to impose restrictions on Bisphenol A-based applications. Since 1 June 2011 European law has prohibited the manufacture and sale of Bisphenol A-based plastic infant feeding bottles. (EU Directive No. 08/2011/EU of 28 January 2011 on the restriction of use of Bisphenol A in plastic infant feeding bottles).
- EU Directive No. 08/2011/EU pertains to infant feeding bottles. However, some of the requirements will be applied in congruent way to other types of packaging.
- Also, some European countries have introduced national restrictions on the use of Bisphenol A-based materials in the food sector.
- EU: Reg. 2024/3190, on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonized classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213

We confirm that the glass packaging which we supply is Bisphenol A-free, in the sense that no BPA has been intentionally added by AGP-E or by our suppliers and complies with the above Directive and regulations.

c. PHTHALATES

Legal bases, regulations and directives

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- Phthalates are a group of chemicals used to soften and increase the flexibility of plastic and vinyl. According to the European Council for Plasticizers and Intermediates, the most frequently used phthalates in Europe are DINP (diisononyl phthalate), DIDP (diisodecyl phthalate) and DPHP (dipropylheptyl phthalate). The low molecular weight phthalates DEHP, DBP, BBP and DIBP have been identified as “substances of very high concern (SVHC)” due to their classification as reproductive toxicants and are listed in Annex XIV of the EC Regulation No. 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH).

We confirm that the glass packaging which we supply does not contain any of the phthalates specified.

d. GENETICALLY MODIFIED ORGANISMS (GMO)

Legal bases, regulations and directives

- Regulation (EU) No. 1829/2003 pertains, among other things, to the approval of and labelling requirements for genetically modified food and feed. The labelling requirements apply to foods and ingredients that have been genetically modified or have been produced from genetically modified organisms. They also apply to unpackaged foods and food served in restaurants and canteens.
- Although Regulation (EU) No. 1829/2003 pertains to all foods and feeds, some requirements will be applied in congruent way to food packaging.

We confirm that the glass packaging which we supply is free of genetically modified organisms (GMO). Thus, they are exempted from the labelling requirement.

e. MOSH/MOAH

We confirm that the glass packaging which we supply is free of MOSH/MOAH

f. Allergens

We confirm that the glass packaging which we supply is free of Allergens

g. Halal

We confirm that the glass packaging which we supply fulfills the Halal demands.

h. Vegan

The composition of glass makes it compatible for packaging utilization for a vegan product.

i. Kosher

We confirm that the glass packaging which we supply fulfills the Kosher demands

j. Shelf life

Standard soda-lime-silica glass used for packaging will not deteriorate in normal use and whilst containing typical food and drink products.

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k. Not added Substances

The following substances are not subject to the glass production process and therefore not a constitutional part of the glass packaging. Listing of the substances in alphabetical order can be found in the Annex I:

Signed by Quality Director Ardagh Glass Europe:



Koos Oostland Dongen 01-07-2026

Legal notice Ardagh Glass packaging made every effort to ensure that the information contained in this document is accurate and up to date. However, we make no representation or warranty as to the up-to-dateness, accuracy, quality or completeness of the information and data provided herein.

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11. Annex I List of non-added substances:

Benzene
Benzophenone (Diphenylmethanone)
Bisphenol A
Bisphenol B
Bisphenol F
Bisphenol S
Diisooctyl phthalate (DIOP) and 1,3-benzenediol (resorcinol)
Ethylene benzene
2-Ethylhexanoic acid
Endocrine disrupting substances**
MOAH (Mineral Oil Aromatic Hydrocarbon)
MOSH (Mineral Oil Saturated Hydrocarbon)
Nanomaterials
Nanoform substances Nitrosamin
PAO (polyalphaolefins)
PET
PET-G
PFAS (per- and polyfluoronic alcy l substances)***
PFCA (Perfluorocarbon acid)
PFOA (Perfluorooctanoic acid)
PFOS (Perfluorooctanesulfonic acid)
PFSA (perfluoronic sulfon acids)
POP ("persistent organic pollutants")****
POSH (Polyolefin Oligomeric Saturated Hydrocarbons)
PVC (Polyvinylchlorid)
PVDC (Polyvinylidenchlorid)
Styrene
Xylenes

* including DEHP (FCM No 283), DBP (FCM No 157), BBP (FCM No 159) and the sum of DiNP (FCM No 728) and DiDP (FCM No 729).

**according to List I: Substances identified as endocrine disruptors at EU level, see also

<https://edlists.org/the-ed-lists>

*** separate statement for PPWR

**** according to Regulation (EU) 2019/1021 on persistent organic pollutants

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12. Overview current regulation EU:

Legal bases, regulations and directives:

<u>REG/Directive</u>	<u>Group of materials in scope</u>
(EC) No 1935/2004 - General principles on safety & inertness for all materials and articles intended to come into contact with food	Plastics, paperboard, metal and alloys, adhesives, printing ink, coatings, glass
EU 2019/904 - Single use plastics Directive	Plastics
(EC) No 2022/1616 - On recycled plastic materials and articles intended to come into contact with foods	Recycled plastics
(EC) No 2023/2006 - On good manufacturing practice for materials and articles intended to come into contact with food	Plastics, paperboard, metal and alloys, adhesives, printing ink, coatings, glass
(EC) 2023/915 of 25 April 2023 on maximum levels for certain contaminants in food	
(EC) No 450/2009 of 29 May 2009 on active and intelligent materials and articles intended to come into contact with food (Text with EEA relevance)	Active and intelligent materials
(EU) No 10/2011 - Safety requirements for plastic materials and articles intended to come into contact with food (including connected amendments).	Plastics
(EU) 2020/1245 of 2 September 2020 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food	Plastics
Directive 94/62/EC of 20 December 1994 on packaging and packaging waste, EU 2025/40	All
Regulation (EU) 2025/40 on packaging and waste regulation	All
Directive 84/500/EEC of 15 October 1984 on the approximation of the laws of the Member States relating to ceramic articles intended to come into contact with foodstuffs	Ceramics
REACH - EC 1907/2006	<u>All</u>
EuPIA (European Printing Ink Association)	Printing Inks
Council of Europe Policy Statement from 22.09.2004 Guidelines for lead leaching from Glass tableware into foodstuffs.	Glass
Regulation EU 2024/3190, the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonized classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213	Adhesives; rubbers; ion-exchange resins; plastics; printing inks; silicones; and varnishes and coatings



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Country	Title
Austria, Bulgaria, Cyprus, Estonia, Hungary, Ireland, Latvia, Lithuania, Luxembourg, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Sweden	No additional specific market regulation/legislation available.
Croatia, national law NN125-2009 art. 23	Rules on the Health safety of consumer goods.
Czech Republic, Decree No. 38/2001 art. 19-28	Decree of the Ministry of Health on hygiene requirements for products intended to come into contact with food and meals
Finland, Författning 268/1992	Although EU directives (84/500/EEC and 2005/31/EC) harmonize rules for ceramic contact materials, Finland 268/1992 remains relevant for specific ceramic products for children and for materials not covered by EU harmonization. For children limits are reduced to 1/10
United Kingdom	Legislations originating from the EU: (EC) No 1935/2004 England: the Materials and Articles in Contact with Food (England) Regulations 2012 (UK SI 2012, No. 2619) Scotland: the Materials and Articles in Contact with Food (Scotland) Regulations 2012 (SSI 2012, No. 318) Wales: the Materials and Articles in Contact with Food (Wales) Regulations 2012 (WSI 2012, No. 2705 (W. 291)) Northern Ireland: the Materials and Articles in Contact with Food (Northern Ireland) Regulations (NISR 2012, No. 384)
Belgium	Royal Arrêté of 11 May 1992 on Materials and Objects Intended for Contact with Foodstuffs 2016 Royal Decree for Varnishes and Coatings
Czech Republic	No. 477/2001 Coll., on Packaging and on Amendments to Certain Other Acts
Denmark	BEK 681 of 25 May 2020 on Food Contact Materials and Penalty Provisions for Infringements of Related EU Regulations.
France	Directorate General for Competition, Consumer Affairs and Repression of Fraud (DGCCRF) Pending, removal of mineral oil in ink DGCCRF Verre - Cristal - Céramique - Vitrocéramique - Objets émaillés du 01/05/2016 Fiche MCDA n°2 (V01 – 01/05/2016)
Germany	Food and Feed Code (LFGB) 15 September 2021 (Federal Law Gazette (BGBl.) I, p. 4253), as amended most recently by Art. 2, Clause 6 of the Act of 20 December 2022 (BGBl. I, p. 2752). Sect. 30 LFGB; Prohibitory Provisions for the Protection of Health Sect. 31, clause 1 LFGB; Migration of Substances into Food Verpackungsgesetz (5.7.2017) => will be replaced by VerpackungsDG (Transposition of the PPWR into German law)
Greece	HSCC Decision No 147/2009 / No 1976/85 /No 598/94
Italy	Ministerial Decree of 03/21/1973 Hygienic regulations for packaging, containers, and utensils intended to come into contact with food substances or substances for personal use. Chapter 5 Glass Objects DPR 777/82 s.m.i DM 21/03/1973 s.m.i.replaced by DM 572
Netherlands	Warenwetregeling
Spain	Real Decreto 847/2011
Switzerland	817.023.21 Ordinance of the DFI on materials and objects intended to come into contact with foodstuffs Swiss ordinance 817.023.21

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13. Annex II Self-assessment Din EN 13427:

Declaration of Conformity for all assessment procedures in accordance with DIN EN 13427

DIN EN 13427 is a series of standards DIN EN 13427 ff. leading overview norm, giving explanations to the individual conformity assessment procedures and obligations.

Declaration of conformity for the container glass industry

Requirements for packaging in accordance with Directive 94/62 / EC		Company: Ardagh Glass	
Statement of compliance with DIN EN 13427		Packaging material: container glass	
Review summary			
requirement / standard	request to the review	requirements for compliance	comment
avoid packaging waste by resource conservation	ensuring a fair minimum of material in packing system (DIN EN 13428)	yes	
heavy metals	assurance that in the packaging components the permissible limits are not exceeded (Art. 11, 94/62 / EC and CR 13695-1)	yes	
malicious and other hazardous substances	ensuring the minimization of hazardous substances in packaging and packaging components (DIN EN 13428 Annex C)	yes	
reuse	not applicable	not applicable	verification by filler
recycling	securing of material recyclability of the packaging unit (EN 13430 DIN)	yes	
energy recovery	does not apply	not applicable	
recycling through composting	does not apply	not applicable	
Note: conformity to DIN EN 13427 requires positive results in all assessment procedures in accordance with sections 1.1, 1.2, 1.3 and at least for a review process of the sections 3.1, 3.2, 3.3. If a re-use is intended, an evaluation method of the bottler / packer in accordance with Part 2 should have a positive result.			
Determination of compliance			
Based on the results of the review process, recorded above in part 1, a positive quality assessment due to the requirements of DIN EN 13427 is claimed for this package.			