

DECLARATION OF CONFORMITY FOR GLASS PACKAGING – MATERIALS AND OBJECTS FOR CONTACT WITH FOOD

RUBIN TRADING JSC with headquarters and management address: Bulgaria, Pleven city, Western Industrial Zone, producer of materials and objects for contact with food - glass bottles and jars

Hereby declares that:

A) Compliance with food contact regulations

The glass packaging produced and delivered by Rubin Trading JSC complies with the applicable regulations regarding materials intended for contact with food. The glass packaging corresponds to the provisions laid down in:

- Commission Regulation (EC) No 1935/2004 from 27 October 2004 on materials and objects intended to come into contact with food.
- Council Regulation (EC) No 2023/2006 from 22 December 2006 on good manufacturing practice for materials and objects intended to come into contact with food and its amendment (Regulation (EU) 2025/351).
- Japan Food Sanitation Act and the Mandatory Positive List system (effective 2025).
- Dutch Warenwetregeling verpakkingen en gebruiksartikelen, Chapter V (Glas en glaskeramiek), regarding national requirements for materials and articles intended to come into contact with food.
- Swiss Ordinance on Materials and Articles in Contact with Food (SR 817.023.21) and its amendments.
- Italian Ministerial Decree of 21/03/1973 "Hygienic requirements for packaging, containers and instruments intended to come into contact with food or substances for personal use.
- Commission Regulation (EU) 2024/3190 from 20 January 2024 into force on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonized classification for specific hazardous properties in certain materials and objects intended to come into contact with food, which amends Regulation (EU) No 10/2011 and repeals Regulation (EU) 2018/213

The containers comply with the provisions of Category A glass, suitable for contact with all types of food under any conditions, including sterilization.

B) The heavy metal content:

- Directive 94/62/EC of the European Parliament and of the Council from 20 December 1994 on packaging and packaging waste, and in particular Decisions 2001/171 / EEC and 2006/340 /EEC on heavy metals content;
- Regulation (EU) 2025/40 on packaging and packaging waste (PPWR).
- Decree of the President of the Republic Italy n. 777 of 23/08/1982 Implementation of Directive (EEC) no. 76/893 relating to materials and objects intended to come into contact with food products.
- Specific migration limits (SML) for heavy metals from glass packaging as prescribed by the Dutch Warenwetregeling verpakkingen en gebruiksartikelen (Lead (Pb) < 0.1 mg/l and Cadmium (Cd) < 0.01 mg/l), verified via analytical testing according to DIN EN 1388-2.
- Industry and FDA standards. Under normal and acceptable use, we guarantee that our packaging will operate at, or above, the accepted industry standards. Glass is generally recognized as safe (GRAS) for food-contact applications by the U.S. FDA based on its long history of safe use.
- The heavy metal contents, e.g. lead, cadmium, mercury and hexavalent chromium of our glass packaging are below 100 ppm, i.e. considerably below the limit values of the US and EC regulations (article 11 of stipulations 94/62/EC).

C) Recycling and environmental compliance

The glass packaging, delivered by us, can be fully recycled as glass material, and that glass cullets from the domestic production and small quantities of glass cullets of controlled origin are recycled in the production cycle, in accordance with the provisions of:

- Directive 2001/42/EC of the European Parliament and of the Council from 27 June 2001 on the assessment of the effects of certain plans and programs on the environment.
- Directive 2010/75/EU of the European Parliament and of the Council from 24 November 2010 regarding pollution prevention and control.
- Regulation (EU) 2025/40 regarding the minimization of packaging and recyclability (Design for Recycling).

The glass packaging is fully recyclable and compliant with Regulation (EU) 2025/40 (PPWR).

Based on current design and material characteristics, the packaging is classified as:

- Recycling Performance Class: A

This classification is based on:

- Mono-material structure (glass)
- Absence of disruptive elements (coatings, labels interfering with recycling)
- Compatibility with existing glass recycling streams
- Detectability and sorting via Near Infrared (NIR) systems

The packaging is suitable for closed-loop recycling systems.

D) REACH, chemical safety and PFAS compliance

Packaging glass is exempt from the pre-registration and registration requirements under Regulation (EC) No 1907/2006 (REACH), according to the provisions introduced by Regulation (EC) No 987/2008. Furthermore, the glass packaging we supply does not contain any substances classified as hazardous or subject to authorization or restriction under REACH or Regulation (EC) No 1272/2008 (CLP).

The glass packaging:

- Does not contain substances listed on the ECHA Candidate List (SVHC)
- Does not contain arsenic
- Does not contain Bisphenol A (BPA) or other bisphenols
- Does not contain phthalates (DEHP, DBP, BBP, DIDP, DINP, DHP)
- Does not contain benzophenone, 4-methyl benzophenone or Isopropyl Thioxanthone (ITX)
- Does not contain any substances that may compromise their suitability for food contact

In compliance with Regulation (EU) 2025/40, our glass packaging and production processes do not intentionally use PFAS (including PFOS and PFOA). Additionally, although not covered by this regulation, our production process does not intentionally use MOSH or MOAH, and their presence is therefore not expected in our glass containers.

E) Allergens and GMO

There is no introduction of allergens indicated in Annex II of Regulation (EU) No 1169/2011, nor of genetically modified organisms (GMOs), in the glass. The glass packaging contains none of the substances or products classified as allergens or GMOs.

F) Functional properties and additional requirements

The glass packaging we produce does not contain any hazardous substances as defined by U.S. regulations on toxic materials, nor does it contain metallization or metallic coatings.

Traceability

Rubin Trading JSC ensures:

- Full traceability of raw materials and finished products
- Batch/Lot identification and production tracking
- Use of approved and qualified suppliers
- Monitoring and control of subcontractors (where applicable)

All processes are carried out in compliance with Good Manufacturing Practice (GMP).

Food segments intended to use glass containers:

- | | |
|---|--|
| ☒ Food | ☒ Olive oil |
| ☒ Spirituous drinks | ☒ Beer |
| ☒ Carbonated and Table wine | ☒ Cosmetics, decorative or other |
| ☒ Water | |

G) PFAS Compliance and Analytical Verification

The glass packaging supplied by Rubin Trading JSC has been assessed for the presence of per- and polyfluoroalkyl substances (PFAS) in accordance with Regulation (EU) 2025/40 (PPWR).

We hereby declare that:

The glass packaging does not contain intentionally added PFAS; any potential presence is below applicable regulatory limits, including both polymeric and non-polymeric substances.

- The packaging complies with the applicable limits defined in PPWR:
 - Individual non-polymeric PFAS: < 25 ppb
 - Total non-polymeric PFAS: < 250 ppb
 - Total fluorine (TF): < 50 ppm
- Compliance with the above limits has been verified through analytical testing.
- Analytical verification has been performed according to the three-step PPWR methodology, including:
 1. Determination of Total Fluorine (TF) by combustion ion chromatography (CIC)
 2. GC/MS pyrolysis screening (performed where applicable)
 3. Targeted PFAS analysis and TOP assay (Total Oxidizable Precursor assay)
- Based on the analytical results, PFAS are not detected or are below the regulatory thresholds.
- A system for supplier qualification, monitoring and periodic re-evaluation is implemented in accordance with GMP (Reg. EC 2023/2006)

This declaration of conformity is issued under the sole responsibility of Rubin Trading JSC, based on current supplier data, risk assessments, and analytical testing. It is valid for 3 years and will be updated immediately upon any changes to regulations, materials, production technology, or compliance status.

May 14, 2026

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