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**In accordance with Article 39 of the European Packaging Regulation – Regulation (EU) 2025/40
(‘Packaging and Packaging Waste Regulation’ – PPWR)**

Company:

Schell GmbH & Co. KG
Raiffeisenstr. 31
57462 Olpe
Germany

Preamble

Schell GmbH & Co. KG develops, manufactures and distributes more than 2,500 different technical products and sealing solutions for industrial applications. As a responsible company, we are committed to the sustainable use of resources and to complying with all applicable European and national legislation relating to our products and packaging.

With this manufacturer’s and compliance declaration, we confirm that our packaging and the associated business processes comply with the requirements of **Regulation (EU) 2025/40 on packaging and packaging waste (Packaging and Packaging Waste Regulation – PPWR)** as well as other relevant environmental legislation. In particular, the requirements set out in Article 39 of the PPWR are met.

1. Packaging Management

Our packaging management aims to reduce packaging to the minimum technically necessary, whilst ensuring product protection, transport safety, compliance with requirements regarding the selection of materials, recyclability, labelling obligations and our customers’ quality requirements.

To this end, the following principles in particular are implemented:

- Use of packaging that is fully recyclable in accordance with the current state of the art.
- Continuous reduction of the proportion of plastic, insofar as this is technically, economically and safely feasible.
- Preferential use of recyclable packaging materials.
- Ongoing optimisation of packaging sizes and material usage to reduce resource consumption.
- Regular review of the packaging materials used with regard to environmental compatibility and recyclability.
- Compliance with all statutory registration, documentation and reporting obligations.

The volumes of packaging generated are regularly reported to recognised waste disposal and take-back schemes, including Interzero (formerly Interseroh), and licensed in accordance with legal requirements.

2. Transparency towards customers

To support our customers in meeting their statutory documentation and sustainability obligations, we provide, on request, analyses of the packaging materials used.

These may include, in particular, information on:

- Paper and cardboard
- Plastics
- Metals
- Wood
- Batteries
- Other packaging-related materials

3. Product materials and the EU Deforestation Regulation (EUDR)

Our products, including their packaging, comply with the requirements of the EUDR. Where our products contain technical seals, these consist exclusively of synthetic rubbers.

Synthetic rubber is generally not classified as a raw material covered by **Regulation (EU) 2023/1115 on deforestation-free supply chains (EUDR)**.

Based on our current product portfolio, no natural rubbers falling within the scope of the EUDR are used in the manufacture of our standard products.

Should products or raw materials falling within the scope of the EUDR be used in future, the due diligence obligations prescribed for this, including proof of origin, risk assessment and documentation, will be implemented in accordance with the legal requirements.

4. Responsibilities and Quality Management

Compliance with legal requirements forms an integral part of our integrated management system.

Our company has the following certified management systems:

- Quality management in accordance with **ISO 9001**
- Energy management in accordance with **ISO 50001**

These management systems support, in particular:

- the continuous improvement of our processes,
- the efficient use of resources,
- the minimisation of environmental impact,
- ensuring consistent product and packaging quality,
- compliance with legal and regulatory requirements,
- the regular assessment of suppliers and the packaging materials used.

Responsibility for implementing the legal requirements lies with the company management and the specialist departments designated for this purpose. Changes to legal requirements are continuously monitored and promptly integrated into operational processes.

5. Technical documentation and record-keeping

To meet statutory requirements, Schell GmbH & CO. KG maintains technical documentation on the packaging and packaging materials used.

This includes, in particular, where applicable:

- specifications of the packaging materials used,
- information on recyclability,
- material compositions,
- packaging weights,
- evidence of packaging quantities,
- Reports to waste disposal and take-back schemes,
- supplier information,
- internal documentation for the assessment of packaging.

To the extent permitted by law and/or agreed contractually, we shall provide our customers or the relevant authorities with the necessary information upon request.

6. Compliance and continuous improvement

Sustainability and the conservation of resources are key components of our corporate strategy.

We regularly review our packaging solutions with regard to:

- material usage,
- recyclability,
- resource efficiency,
- legal requirements,
- customer requirements.

We continuously monitor new legislative developments and incorporate them into our product and packaging development.

7. Legal Basis

This statement is based in particular on the following legislation:

- **Regulation (EU) 2025/40** on packaging and packaging waste (Packaging and Packaging Waste Regulation – PPWR).
- **Regulation (EU) 2023/1115** on deforestation-free supply chains (EU Deforestation Regulation – EUDR), insofar as its scope of application is relevant.
- **Directive 2008/98/EC** on waste (Waste Framework Directive).
- The applicable national regulations implementing European packaging and waste legislation, in particular the German Packaging Act (VerpackG), where applicable.
- Other relevant European and national environmental regulations, insofar as these relate to the manufacture, packaging, labelling, take-back and disposal of our products.

Final provisions

This Manufacturer's and Compliance Declaration has been drawn up with great care to the best of our knowledge and belief, based on the legal requirements in force at the time of issue.

It documents the organisational and technical measures put in place by Schell GmbH & Co. KG to ensure compliance with the relevant legal provisions. It does not constitute a guarantee of quality within the meaning



of civil law and does not replace product-specific evidence where such evidence is required by law or contract.

The declaration is reviewed regularly and updated accordingly in the event of changes to legal requirements or significant changes to our products, packaging or business processes.