

Declaration of Conformity with Regulation (EU) 2025/40 (PPWR)

With the Packaging and Packaging Waste Regulation (PPWR), the EU has introduced a comprehensive regulation aimed at reducing packaging waste, promoting the circular economy and improving the recyclability of packaging. The PPWR applies directly in all EU Member States and lays down requirements for packaging manufacturers, operators placing packaging on the market and users.

The ALCAR Group is the market leader in the European aftermarket for alloy and steel wheels. ALCAR's core business comprises the production and national and international wholesale distribution of alloy and steel wheels. The companies in the ALCAR Group are characterised by a strong customer and market focus, innovative designs, high-quality production and service-oriented logistics. The packaging used for products placed on the market consists exclusively of transport packaging designed to protect the goods and ensure their identification, rather than sales packaging designed for the “end customer” target group. The packaging used by ALCAR is generally designed for B2B distribution. It serves primarily to protect the goods, facilitate their handling and ensure their clear identification during transport, storage and transfer within the commercial supply chain. Presentation to end customers is not its primary purpose. End customers therefore generally do not receive this wholesale or transport packaging, as ALCAR products are usually purchased through specialist tyre dealers, workshops or car dealerships, where they are directly fitted or further processed.

Packaging Compliance with the Requirements of the PPWR

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Subject Matter and Scope of the Conformity Assessment

Articles 1 to 4 of the PPWR govern the subject matter and objectives of the Regulation, its scope, definitions and the free movement of goods. They establish the general legal framework but do not contain any independent substantive sustainability or labelling requirements whose fulfilment must be demonstrated separately in this Declaration of Conformity. In accordance with Article 39(1) PPWR, the following conformity assessment therefore relates to the applicable requirements of Articles 5 to 12. The applicability of the individual requirements depends on the material, function and design of the respective packaging.

1. Recyclability & Design (Article 6)

ALCAR already uses recyclable materials, mainly from the categories of cardboard (boxes and intermediate layers), wood (pallets) and PE film, to protect products along the supply chain (transport, handling and storage). No problematic combinations of materials or prohibited substances are used, and all packaging is designed exclusively for functional purposes.

2. Substance Restrictions (Article 5)

Pursuant to Article 5 PPWR, the concentrations of the heavy metals lead, cadmium, mercury and chromium VI must not exceed a total content of 100 mg/Kg.

ALCAR confirms that the above-mentioned prescribed limits for prohibited or restricted substances (such as lead, cadmium, mercury, chromium or PFAS) are not exceeded in the packaging materials used.

3. Minimum Recycled Content (Article 7)

The packaging materials used by ALCAR already contain a high proportion of recycled material and will continue to meet the existing EU target requirements in the future. At the same time, ALCAR continuously examines the use of alternative packaging materials in order to increase the recycled content.

4. Reuse & Refill (Article 11)

The packaging used by ALCAR is generally designed as single-use packaging for one-time use in the logistics and distribution system and can be sent for material recycling after use.

The packaging is therefore not designed as reusable packaging within the meaning of Article 11 PPWR and is consequently not subject to the specific requirements of that Article. Where reuse is possible in terms of materials and processes, it is pursued.

5. Packaging Minimisation (Article 10)

The packaging used by ALCAR has been designed in accordance with the requirements of Article 10 of Regulation (EU) 2025/40 so that its weight and volume are reduced to the minimum necessary to ensure functionality.

The following performance criteria were considered in particular when designing the packaging:

- Protection of the packaged product during transport, storage and handling
- mechanical stability of the packaging
- requirements for logistics and palletisation
- handling and functionality of the packaging in the filling and packaging process
- hygiene and safety requirements
- information and labelling requirements
- requirements concerning the recyclability and circularity of the materials used

6. Labelling & Information (Article 12)

The PPWR provides for harmonised labelling requirements to support sorting and provide information on the material composition of packaging. The specific technical specifications for these labels will be laid down in delegated and implementing acts of the European Commission. Once these specifications have been published, the corresponding labels will be applied to the extent technically feasible. Furthermore, where legally required and technically feasible, the packaging bears identification details and information on the responsible economic operator, either directly on the packaging, on a data carrier or in accompanying documentation.

7. Bio-based Plastics (Article 8)

Article 8 currently sets **no mandatory** usage quotas, as the European Commission is closely examining the environmental compatibility and technological development of such plastics until February 2028. Once these usage quotas have been published, they will be implemented to the extent technically feasible.

8. Compostability (Article 9)

The requirements of Article 9 PPWR apply to certain packaging applications for which industrial compostability is prescribed. For the packaging described in this Declaration of Conformity, compostability within the meaning of Article 9 is neither intended nor required.

9. Extended Producer Responsibility (EPR)

Registration with and/or participation in national waste disposal, collection and recycling systems, as well as the corresponding payments to finance waste management and dual systems, are already established practice in the countries in which ALCAR operates.

10. Harmonised Standards and Other Technical Specifications

The conformity assessment of the packaging described was carried out using relevant technical specifications and industry-standard testing criteria. The following were taken into account in particular:

- Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)
- Requirements regarding heavy metal content pursuant to Article 5 PPWR (limit value: 100 mg/kg for Pb, Cd, Hg and Cr VI)

11. Technical Documentation

The conformity assessment is based on technical documentation aligned with Annex VII PPWR. This includes in particular:

- Description of the packaging and its components
- Material composition
- Details of the materials used
- Evidence of compliance with relevant substance restrictions
- Supplier information

The technical documentation is retained in accordance with the statutory requirements and made available upon request.

ALCAR WHEELS GMBH