



Conformity of packaging for batteries — Status: August 2026

PPWR, REACH und EPR Compliance Statement

Dear Sir or Madam,

VARTA hereby confirms that, to the best of its current knowledge, the batteries distributed by VARTA in the European Union, including their sales, grouped and transport packaging, comply with the requirements applicable to such packaging as of 12 August 2026 under Regulation (EU) 2025/40 on packaging and packaging waste ("PPWR") and Regulation (EC) No 1907/2006 ("REACH"), and that the applicable extended producer responsibility ("EPR") obligations are met.

1. Requirements as manufacturer under the PPWR

Where VARTA assumes the role of manufacturer within the meaning of Article 3(1), point 13 PPWR with regard to packaging, the applicable requirements of the PPWR are fulfilled. These include, in particular:

- carrying out or arranging the conformity assessment pursuant to Article 38 PPWR;
- drawing up and maintaining the technical documentation pursuant to Annex VII PPWR;
- drawing up and updating the EU declaration of conformity pursuant to Article 39 PPWR in accordance with the model set out in Annex VIII PPWR;
- compliance with the labelling and information obligations applicable as of 12 August 2026.

The technical documentation and the EU declaration of conformity are drawn up before the respective packaging is placed on the market (Article 15(2) PPWR). The EU declaration of conformity and the underlying technical documentation are retained for at least five years after placing on the market for single-use packaging and at least ten years for reusable packaging, kept up to date and made available to the competent market surveillance authorities upon reasoned request.

2. Requirements as producer under extended producer responsibility (EPR)

Where VARTA holds the role of producer within the meaning of Article 3(1), point 15 PPWR with regard to certain packaging, VARTA fulfils the applicable extended producer responsibility obligations pursuant to Articles 44 to 46 PPWR and the supplementary national provisions of the Member States concerned (in Germany, in particular the Verpackungsrecht-Durchführungsgesetz (VerpackDG) - Packaging Act).

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Sitz: Ellwangen
Registergericht:
Ulm, HRB 725931

Ein Unternehmen der VARTA AG,
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These include, in particular:

- registration in the producer register of the respective Member State before making packaging available for the first time in that Member State (Article 44 PPWR);
- fulfilment of the financial and reporting obligations under extended producer responsibility (Article 45 PPWR);
- appointment of an authorised representative for extended producer responsibility in Member States in which VARTA is not established, where required;
- where applicable, participation in a producer responsibility organisation (Article 46 PPWR).

The corresponding obligations are fulfilled in all Member States in which VARTA qualifies as a producer within the meaning of the PPWR.

3. Substance requirements - PPWR and REACH

PPWR: The packaging used by VARTA complies with the requirements of Article 5 PPWR on substances in packaging. The sum concentration of lead, cadmium, mercury and hexavalent chromium in packaging or packaging components does not exceed 100 mg/kg; substances of concern are minimised. The PFAS limits applicable from 12 August 2026 for food-contact packaging are generally not relevant for the battery packaging used by VARTA; the corresponding assessment is nevertheless part of the technical documentation.

REACH: To the best of its current knowledge, the packaging used by VARTA complies with the requirements of Regulation (EC) No 1907/2006 applicable to packaging. Where substances of very high concern (SVHC) on the applicable candidate list are present in concentrations above 0.1 % (w/w), the information obligations under Article 33 REACH and the notification obligations to the SCIP database under Article 9(1)(i) of Directive 2008/98/EC are fulfilled. In addition, the restrictions of Annex XVII REACH relevant for packaging and its components are observed.

4. Provision of information along the supply chain

VARTA provides customers, authorities and other authorised economic operators with the information and evidence required for their respective role under the PPWR to the extent provided for by law, and fulfils the information and cooperation obligations applicable to VARTA along the supply chain.

5. Scope clarification

This statement relates exclusively to the packaging of the batteries distributed by VARTA. The batteries themselves are subject to Regulation (EU) 2023/1542 (Battery Regulation); the conformity assessment,

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labelling and producer responsibility obligations provided for therein are fulfilled and documented separately by VARTA.

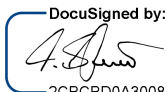
6. Reservation

This statement is based on the legal requirements in force at the date of issue, on the information available to VARTA and on information from the respective supply chain. It does not constitute a warranty, guarantee or assurance of quality or durability in the legal sense. Changes resulting from new legal requirements, future delegated acts or implementing acts of the European Commission, as well as updated supply chain information, remain reserved.

Yours sincerely,

VARTA Microbattery GmbH

Ellwangen, **11.08.2026**
Ort/ Place Ausstellungsdatum/ Date of issue

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p.p.a. 2CBBCBD0A300840D...
Name Unterschrift/ Signature

Managing Director

Funktion/ Function

Signed by:

i.V. 0596053BB1B64A2...
Name Unterschrift/ Signature

VP Quality

Funktion/ Function

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