DECLARATION OF COMPLIANCE № 01/2026-FC

revision 02-d dd. 13.11.2026

1. Information about the market operator that manufactures the articles intended to come into contact with food and issue this Declaration of Compliance:

Information about the Manufacturer		
Name and legal address of the Manufacturer	*Spetztekhosnatka Ltd., 122 Vasylievska Street, Kamianske, 51900, Ukraine*	
Address of the manufacturing site	*10, Tretii Travnevyi Lane, Kamianske, 51900, Ukraine*	
EDRPOU identification code	*13429839*	
Contact phone number	*+380569588710*	*+380504168630*
E-mail	*dsto@d-sto.com*	*vitalplast@vitalplast.com*
Company website	*https://d-sto.com/*	*https://vitalplast.com/*
CEO Name	*Volodymyr LEMPERT*	
Name of the Plastic Parts Production Director	*Viktor ZIABREV*	
Place of issuance of the Declaration	*Kamianske*	

2. Name and other details enabling identification of the articles intended to come into contact with food:

Rigid plastic packaging (containers, lids) of various shapes (round, oval, triangular, rectangular, etc.), and sizes and capacity (from 25 ml to 18 litres) is manufactured by Spetztekhosnastka Ltd., Vital Plast TM, in accordance with TU U 22.2-13429839-002:2018 and is intended for packaging of food products following the conditions set forth in this Declaration (hereinafter - the articles).

This Declaration applies to all groups of injection-molded articles made of polymer materials (polypropylene (PP), polyethylene (PE), styrene-acrylonitrile copolymer (SAN), with the possibility of adding colorants and/or IML, which are manufactured and supplied by Spetztekhosnastka Ltd., Vital Plast TM, and does not apply to a specific article.

The grouping of articles for compliance assessment purposes is carried out taking into account the grade and composition of the polymer raw material, manufacturing technology, structural and geometric characteristics, thickness, the surface area-to-volume ratio (S/V), and intended conditions of contact with food products.

We confirm that our articles are made from primary raw materials only that are permitted for contact with food and ensure the stability of the functional characteristics of the articles and are subject to recycling, as evidenced by the appropriate marking. No recycled raw materials (PCR) are used in production of these articles.

According to the results of the tests and evaluation of the materials used, the articles, under normal and foreseeable conditions of use, do not deteriorate the organoleptic characteristics of food products.

Traceability in conformity with Article 17 of Regulation (EC) № 1935/2004 is ensured for each article in terms of raw materials, internal and external packaging (at the level of batch numbers, labels, product inscriptions, etc.), as well as by issuing a Quality Certificate for each batch of products.

3. Compliance of the articles intended to come into contact with food with the following requirements :

- Law of Ukraine № 2718-IX of 03.11.2022 “On materials and articles intended to come into contact with food”, including the requirements of good manufacturing practice (GMP);
- Law of Ukraine № 771/97- BP of 23.12.1997 “On basic principles and requirements for the safety and quality of food products”;
- Order of the Ministry of Health № 2104 of 11.12.2023 “On approval of special requirements for plastic materials and articles intended to come into contact with food”;
- Order of the Ministry of Health № 1858 of 10.12.2025 “On approval of the Rules for studying the migration of constituent elements of plastic materials and articles intended for contact with food, and the list of model environments that should be used to study the migration of constituent elements of plastic materials and articles intended for contact with food”;
- Regulation (EC) № 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food, including Articles 3, 11(5), 15 and 17;
- Regulation (EU) № 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food, as amended;
- Regulation (EC) № 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food;
- Regulation (EU) № 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC;
- TU U 22.2-13429839-002:2018 “Disposable containers and household articles made of plastic”.

4. Specification of the articles intended to come into contact with food :

1) Category of the food products the relevant article is intended to contact with.	The articles are intended for contact with all types of food in accordance with the conditions of use set forth in this Declaration. The specific suitability of the articles for contact with food intended for babies and young children, within the meaning of Regulation (EU) № 10/2011, is not separately confirmed by this Declaration and requires a separate conformity assessment taking into account the specific requirements of Article 12(2) and Article 17(2) of Regulation (EU) № 10/2011.
2) Food safety marking.	✓ name of the manufacturing company or its mark for goods and services ; ✓ graphic symbol for products that do not come into contact with food at the time of sale in accordance with Annex II of Regulation (EC) № 1935/2004 Article 19 and Appendix № 1 of the Law of Ukraine; ✓ abbreviated name or code of the material from which the product is made, and a recycling symbol.

3) Duration, conditions and temperature regime of processing and/or storage in case of contact with food products.	✓ long-term storage at room temperature or below ; ✓ short-term contact under hot pouring conditions and/or heating to a temperature of 70°C for 2 hours or 100°C for 15 minutes, calculated by the formula: t = 120/2^((T-70)/10) minutes, where T is the filling temperature. Taking into account the physical and mechanical properties of polymeric materials, which at elevated temperatures acquire plasticity, which can lead to deformation of articles during filling and capping, following is recommended: ✓ recommended temperature of the food product during filling - from 1°C to 70 °C; ✓ maximum temperature of an article when capping the lid - no higher than 35 °C; ✓ filling an article according to its nominal capacity; ✓ before filling, keep the products (at least 24 hours) in a room with a temperature of (21±2)°C; ✓ use of the articles in the conditions other than those listed in this declaration, requires a separate feasibility study.
4) Ratio of the surface area of an article in contact with food to its volume for which compliance with the established migration limits has been checked	To determine the ratio of food contact surface area to volume used to establish product compliance, a standard value of 6 dm2/1 kg of food was used for all products, based on the worst-case principle, or the actual surface area to volume (S/V) ratio for products whose geometry requires a different approach.
5) Packaging and recommended storage conditions for products intended for contact with food.	✓ the articles are packed in plastic bags and corrugated cardboard boxes using adhesive tape, placed on pallets and wrapped with stretch film; ✓ the articles must be stored at a temperature of +1°C to +35°C in dry, clean, covered warehouses at a distance of at least 1 m from heating devices, protected from sunlight; ✓ during storage, it is necessary to take into account all manipulation signs on product boxes, such as: “Top”, “Fragile”, “Keep out of rain”, “Keep out of sunlight”; ✓ take into account additional recommendations listed on the website https://vitalplast.com

5. Information on substances or their degradation products used for the production of plastic articles for which restrictions and/or specifications are provided for by legal requirements, in order to comply with the established restrictions by market operators engaged in further processing and/or production of materials and objects.

5.1. Overall migration limits (OML)

Based on testing of finished products carried out by an accredited laboratory in food simulants A (10% ethanol), B (3% acetic acid) and D2 (olive oil) at 40°C for 10 days, it was confirmed that the overall migration limits (OML) do not exceed 10 mg/dm^2 according to the requirements of the Order of the Ministry of Health of Ukraine № 2104 and Regulation (EU) № 10/2011.

5.2. Specific migration limits (SML)

a) Substances with SML from Annex I to Regulation (EU) № 10/2011:

According to declarations from raw material manufacturers (RCPD/DDS), the following substances subject to restrictions are present in the raw materials, and their specific migration does not exceed the established limits:

- acrylonitrile (CAS No.12100, FCM No.225) - (ND) - with detection limit - SML = 0,01 mg/kg.
- 9,9-bis(methoxymethyl)-9H-fluorene (CAS No. 182121-12-6, FCM No. 746/779) — SML = 0.05 mg/kg.

- N,N-bis(2-hydroxyethyl) alkyl (C8-C18) amine / alkoxylated amine (CAS № 97925-95-6, Ref. № 39090/39120, FCM №19-20) — SML = 1.2 mg/kg.

b) Specific migration of elements (Annex II to Regulation (EU) No 10/2011):

Specific migration tests on finished products in 3% acetic acid confirm compliance with Annex II limits:

- Aluminium: < 0.15 mg/kg (Limit: 1.0 mg/kg);
- Barium: <= 0.13 mg/kg (Limit: 1.0 mg/kg);
- Zinc: <= 0.35 mg/kg (Limit: 5.0 mg/kg);
- Heavy metals and other elements (Pb, Cd, Hg, Cr, As, Sb, Co, Cu, Fe, Li, Mn, Ni): not detected or below detection limits.

(Verified by Test Reports No. 8612-8614/24-v and No. 2597/2026).

5.3. Based on the documentation from the suppliers of the materials used, it has been confirmed that:

- the sum of the primary aromatic amine (PAA) subject to the requirements of Annex II to Regulation (EU) No 10/2011 does not exceed the established detection limit of 0.01 mg/kg, in accordance with the applicable requirements thereof
- unintentionally added substances (NIAS) are assessed in accordance with Article 19 of Regulation (EU) № 10/2011;
- bisphenols (S, F, A, B) are not used during the production of the raw materials used.

5.4. REACH

Based on information from material suppliers, the articles:

- do not contain substances included in the Candidate List of the European Chemicals Agency (ECHA) valid on the date of issuance of the Declaration, in a concentration exceeding 0.1% by weight;
- comply with the restrictions applicable to them set out in Annex XVII of Regulation (EC) № 1907/2006 (REACH).

5.5. Genotoxic substances

Based on the documentation from the suppliers of the materials used and the conformity assessment, no intentionally used substances have been identified for which genotoxicity is not excluded and which could be present in the finished product in an amount capable of leading to individual migration into the food product of more than 0.00015 mg/kg (0.15 µg/kg).

5.6. PFAS

Based on the supplier documentation, it has been confirmed that no intentionally added per- and polyfluoroalkyl substances (PFAS) are used in the production of the raw materials used.

No processing materials or auxiliary agents are used in the production of the finished articles that could be a source of PFAS transfer to the finished products.

Laboratory tests of representative samples of finished products confirmed that the content of each of the tested PFAS is <0.01 mg/kg (10 ppb) at a limit value of 25 ppb; the total content of the tested PFAS is not detected at a limit value of 250 ppb; the content of total fluorine (TF) is <20 mg/kg at a limit value of 50 mg/kg.

The articles comply with the applicable requirements of Article 5(5) of Regulation (EU) 2025/40 on PFAS.

5.7. Heavy metals — migration and total content

The articles comply with current requirements regarding heavy metals and metallic elements established by Regulation (EU) No 10/2011 and Regulation (EU) 2025/40.

Specific migration into food:

The specific migration of elements subject to restrictions under Annex II to Regulation (EU) № 10/2011 (including relevant restrictions for heavy metals) does not exceed the established specific migration limits. Compliance has been verified through testing of representative samples of the finished products using appropriate food simulants and is addressed separately in Section 5.2 of this Declaration.

Total content in the packaging:

The results of laboratory tests on representative samples of finished products have confirmed that the total concentration of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr(VI)) is

below the limit of quantification and does not exceed the established limit value of 100 mg/kg, which complies with the requirements of Article 5(4) of Regulation (EU) 2025/40.

5.8. Nanomaterials

Nanomaterials as defined in Regulation (EU) № 10/2011 are **not used** in the production of the raw materials and finished products.

6. Information relative to the substances which are subject to restrictions in food (Dual-Use Additives)

According to the information provided by the raw material suppliers, the following dual-use additives regulated by Regulation (EC) № 1333/2008 and Regulation (EC) № 1334/2008 may be present in the manufactured articles:

- E 471 (Mono- and diglycerides of fatty acids);
- E 470a (Calcium salts of fatty acids / Calcium stearate);
- E 211 (Sodium benzoate).

The purity criteria and authorized levels for these substances comply with applicable food safety legislation.

7. Confirmation that in case of use of functional barrier in multilayer plastic materials and articles such materials or articles meet the requirements of the legislation.

Some of our products are manufactured using In-Mold Labeling (IML) technology, integrated into the outer layer and separated from the food product by a polymer layer, which performs the function of a functional barrier in accordance with the Law of Ukraine № 2718-IX and Regulation (EU) № 10/2011.

We confirm that according to the documentation from the raw material suppliers, risk analysis (including NIAS), as well as the results of testing of finished products with IML in an accredited laboratory, in model media A, B and D2 the overall migration limits (OML) at a temperature of 40°C for 10 days and the specific migration limits (SML) at a temperature of 40°C for 10 days do not exceed the established limits.

8. Conditions of validity of the declaration and user responsibility .

Production is carried out within the framework of a food safety management system certified under the FSSC 22000 scheme.

The above-mentioned polymer articles (packaging/ containers with lids of various shapes) are suitable for contact with food and meet the requirements of the current legislation of Ukraine and the EU. The tests for general and specific migration confirm that the products are safe for use with all types of food products.

To prevent the migration of potentially migrating substances, the manufacturer of the final filling product (the product packed in a container) bears full responsibility for the stability of the substances in the filled package and must confirm the safety of the packaging for the specific type of food product for which it is intended.

This Declaration is valid only if the articles are used in accordance with the requirements of good manufacturing practice (GMP), as well as in accordance with the filling conditions specified in paragraph 4 of this Declaration. The articles must not undergo changes or additional processes that may adversely affect their safety or quality.

Director
Of the Plastic Products Production **Viktor ZIABREV**