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Igepa Polska Sp. z o.o.
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Product Stewardship Information Sheet

Product(s)	CustomKote® Paperboard
Manufacturing Location	Mahrt Mill Cottonton, AL

The following information is provided pertaining to the above referenced materials ("Products") produced for your company by WestRock Company ("the Company").

California Proposition 65

The Product referenced above does not require a warning under the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).

Carcinogenic, Mutagenic or Toxic for Reproduction (CMR)

The Company does not intentionally add CMR category 1A and 1B substances as categorized by Annex XVII of REACH (EC) No. 1907/2006 at levels which exceed 0.1% in the listed Product.

Consumer Product Safety Improvement Act of 2008

This Act does not apply to the Product listed above when it is used as a component of packaging. Additionally, the Product produced by the Company is not itself a "children's product", since it is not "designed or intended primarily for children 12 years of age or younger." Further, amendment H.R. 2715 of 2011 exempts "ordinary books" and "ordinary paper-based printed materials" from third party testing for lead. This amendment also establishes that phthalate content limits apply only to "any plasticized component part" of the covered children's products.

Please be advised that the following substances are not intentionally added to the Product grade listed above: lead (Pb), di-(2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP), diisononyl phthalate (DINP), diisodecyl phthalate (DIDP), or di-n-octyl phthalate (DnOP).

Dodd – Frank Wall Street Reform and Consumer Protection Act, Section 1502 "Conflict Minerals"

The Company does not intentionally add columbite-tantalite (coltan, niobium, and tantalum), cassiterite (tin), gold, wolframite (tungsten), or their derivatives to the Product referenced above.



Elemental Chlorine Free

The terms elemental chlorine-free (ECF) and total chlorine-free (TCF) refer to the bleaching of pulp, most commonly of virgin fiber. The above listed Mill produces all grades from unbleached fibers and does not perform any fiber bleaching steps or use elemental chlorine (Cl₂) in the papermaking process.

(EU) No 528/2012 Biocidal Products Regulation (BPR)

The listed Products do not have a primary biocidal function, thus are not considered biocidal products or treated articles under the Biocidal Products Regulation. Any biocide used in raw materials and additives are not intended to have a biocidal function in the finished packaging material. Therefore, the Product is also not considered a treated article under this regulation.

European Union Regulation (EC) No. 1907/2006 Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH)

REACH is an extensive regulation that covers any substance, preparation or article manufactured in or imported into the European community. The actions which must be taken under REACH are specific to the category, (substance, preparation or article) under which the product falls. The above listed product ("Products") is an article as defined by Article 3(3) of REACH and as clarified in the "Guidance on Requirements for Substances in Articles" Appendix 3(4).

The Company's Products do not contain chemicals intended to be released during the use of the Products and as a result are not subject to the registration requirements of REACH section 7(1).

Companies that produce articles that contain chemicals on the list of "Substances of Very High Concern" ("SVHC") at levels of 0.1% are required to notify customers of the presence of these chemicals. The Company has reviewed the chemicals listed on the ECHA Candidate List of Substances of Very High Concern for Authorization. The Company's products contain less than 0.1% of any SVHC as listed in the most current REACH update as of the date of this letter.

The Company will continue to monitor European Community action which would list any of the proposed SVHC chemicals in Annexes XIV or XVII of REACH and subject them to authorization or restriction requirements. The Company will take appropriate actions required by REACH based on those listings.

EU RoHS and WEEE Directives

The following information applies to European Council Directive 2011/65/EU as amended by 2015/863, on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS 2 and RoHS 3) and Directive 2012/19/EU, on waste electrical and electronic equipment (WEEE). The scopes of the RoHS and WEEE, as set forth in Article 2 of those Directives, do not include packaging or packaging materials but rather applies only to electrical and electronic equipment as defined in Article 3 (a). As such, the requirements of RoHS and WEEE are not applicable to the Product as sold to your company by the Company when used as packaging.

The chemical content and waste minimization issues addressed in WEEE and RoHS for electrical equipment are covered for packaging under European Council Directive 94/62/EC on packaging and packaging waste. This Directive prohibits both the presence of lead, mercury, hexavalent chromium and cadmium above a combined concentration of 100 parts per million and the intentional use of these four metals in packaging materials. The above listed Product meets this limitation. This limitation is more stringent than the limit set forth in RoHS and WEEE.



In addition to the four heavy metals discussed above, RoHS also covers the use of poly brominated biphenyls ("PBB"), poly brominated diphenyl ethers ("PBDE") including decabromodiphenylether and decabromodiphenyloxide and certain phthalate compounds. The Company does not intentionally add PBB or PBDE based flame retardants or the listed phthalates to the Products produced for your company.

Endocrine Disrupting Chemicals

The Company does not intentionally add to the Products manufactured for your company, any of the 45 substances listed as endocrine disrupting chemicals by the International Panel on Chemical Pollution of the United Nations Environment Programme in quantities above the established regulatory threshold of 0.1% of the finished product.

U.S. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

The Company may use antimicrobials or biocides in our raw materials and process systems. These substances are registered with the US EPA for the intended use as required by FIFRA. The listed Product is not treated with fungicides, insecticides, or rodenticides.

Heavy Metals

The Company has its supplier's assurances that the components used in the production of the above referenced packaging products do not intentionally contain lead, cadmium, mercury and hexavalent chromium and that these components are in compliance with the requirements of the Toxics in Packaging Laws, CONEG Model Legislation, and Article 11 of the EU Directive 94-62-EC; namely, that the sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium present in any package or package component does not exceed 100 ppm.

The following heavy metals are not intentionally added to the Products produced for your company and the trace concentrations do not exceed these specified levels: Antimony (60ppm), Arsenic (25ppm), Barium (500ppm), Chromium (60ppm).

The Company does not monitor or restrict the use of Copper, Cobalt, Europium, Gadolinium, Iron, Lanthanum, Lithium, Manganese, Nickel, Zinc, or Terbium, although these metals are not likely to be present in the Products produced for your company other than in trace amounts.

Mineral Oil- MOSH/MOAH:

Mineral Oil Aromatic Hydrocarbons (MOAH) and Mineral Oil Saturated Hydrocarbons (MOSH) are not discreet compounds but are complex combinations of compounds which are only defined through the regulatory process and analytical method. Regulations that address the unintended presence of MOSH and MOAH are still under development. Product additives may contain petroleum hydrocarbons, mineral oils or mineral waxes as processing aids, carriers or defoamers, which are compliant with the relevant regulations for direct food contact substances. Although these substances are cleared under applicable global food contact regulations, they may fall into some proposed regulatory definitions of MOSH and MOAH. The Company will evaluate mineral oil related regulations when they are finalized and determine any actions necessary for compliance.

Mineral Oil - French Law N ° 2020-105 on the fight against waste and the circular economy

Article 112 of N 2020-105 establishes that as of 1 January 2022 it is forbidden to use mineral oils on packaging. The summary statement presented to the French legislature establishes the connection between the use of mineral oil -based inks of paper and cardboard to the downstream use of recycled fiber in food packaging. The intent is to address mineral oil in printing inks which are applied "on" packaging which may be recycled.



The subsequent Order of April 13, 2022 *specifying the substances contained in mineral oils whose use is prohibited on packaging and for printing intended for the public* defines “mineral oils” as being used for the manufacture of inks. The above listed product is not a printed material. Restrictions on the content of mineral oil-based additives in the paper and board packaging material are not identified in the context of this law.

US National Organic Program – Department of Agriculture

The following information is provided in regard to the packaging materials requirement of 7 CFR § 205.272 Commingling and contact with prohibited substance prevention practice standard.

The above Products are not treated with synthetic fungicides, preservatives, or fumigants. However, most paper manufacturing processes use biocides to control biological growth in the process. Further, raw materials and additives may contain biocides to prevent their degradation during storage. The biocides are suitable for use in direct food contact packaging, are added to the raw material at very low levels and have no functional purpose in the finished packaging product or food packaged in the finished product.

Nanomaterials

The Company does not use engineered nanomaterials to produce the above-named Products. Our raw materials may include products that contain naturally or incidentally occurring materials that may be greater than 1 nm and less than 100 nm in one or more dimensions. By ASTM definitions, these could be nanoscale or nanoparticle in dimensions.

Palm Oil and Derivatives

The Company does not intentionally add palm oil during the manufacture of the listed products; however, we may use processing aids that are manufactured from fatty acids of unknown origin.

Per- and Poly- Fluorinated Chemicals

The Company does not intentionally add or use as processing agents, mold release agents, or intermediates, per- or polyfluoroalkyl substances (“PFAS”) to the above listed Product(s) shipped to your company, such that the presence of PFAS when measured as total organic fluorine is equal to or greater than 100 parts per million. PFAS includes perfluorooctanoic acid (“PFOA”), perfluorooctane sulfonate (“PFOS”) and other fluorinated organic chemicals containing at least one fully fluorinated carbon atom.

PBT Chemicals Under TSCA

The US EPA issued final rules on certain chemicals that are persistent, bioaccumulative and toxic (PBT) on January 6, 2021. The Company does not intentionally add decabromodiphenyl ether (CASRN 1163-19-5), hexachlorobutadiene (CASRN 87-68-3), pentachlorothiophenol (CASRN 133-49-3), phenol, isopropylated phosphate (3:1) (CASRN 68937-41-7), or 2,4,6-tris(tert-butyl)phenol (CASRN 732-26-3) or chemical mixtures which have known concentrations of these compounds to manufacture the Products shipped to your company.

Persistent Organic Pollutants

European Union Regulation (EU) No 2019/1021 on Persistent Organic Pollutants implements restrictions on substances as established by the Stockholm and Rotterdam Conventions on Persistent Organic Pollutants. The above listed Product does not contain intentionally added substances as listed in Annexes I, III, and IV, as amended.

Additional Substances

The following substances are not known to be intentionally added components of the listed Product.



- Acrylamide monomer
- Anthraquinone (AQ) pulping catalyst
- Antimony and its compounds
- Arsenic and its compounds
- Asbestos
- Azo dyes that may release one of the aromatic amines listed in Annex XVII of the EU REACH Regulation
- Barium and its compounds
- Benzophenone (BP), 4-methylbenzophenone (4-MBP)
- Beryllium and its compounds
- Bisphenols, including BPA, BPB, BPF, BPS or analogues or derivatives
- Cobalt and its compounds
- Cyanide and its compounds
- Dimethyl fumarate (DMF)
- Epoxidized soybean oil (ESBO), Epoxidized linseed oil (ELO)
- Epoxy derivatives, including Bisphenol A diglycidyl ether (BADGE), Bisphenol F diglycidyl ether (BFDGE), Novolac glycidyl ethers (NOGE) as listed in (EC) No 1895/2005
- Flame Retardants: including brominated or halogenated fire retardants and chloroparaffin compounds
- Formaldehyde
- Fragrances, for the purpose of altering the organoleptic properties.
- 2- Isopropylthioxanthone (ITX)
- Melamine resin or melamine-formaldehyde
- Natural rubber and natural rubber latex
- Nickel and its compounds
- Nitrosamines
- Organotin compounds, Dioctyltin (DOT), Dibutyltin (DBT) Tributyltin (TBT), triphenyltin (TPhT)
- Ortho-phthalates (esters of phthalic acid)
- Ozone depleting compounds (40 CFR § 82, Appendix A & B)
- Paraben Preservatives, including Methylparaben, Ethylparaben, Propylparaben, Isopropylparaben, Butylparaben, Isobutylparaben, and Benzylparaben
- Perchlorate
- Photoinitiators or photopolymers
- Polybrominated Biphenyls (PBB), Polybrominated diphenyl ethers (PBDE), Polybrominated biphenyl ethers (PBBEs), Polybrominated biphenyl oxide (PBBO)
- Polychlorinated Biphenyls (PCBs) or Terphenyls
- Polycyclic Aromatic Hydrocarbons (PAHs)
- PVC (polyvinyl chloride), PVDC (polyvinylidene chloride) or Vinyl Chloride
- Radioactive substances
- Strong sensitizers as listed in US Regulation 16 CFR §1500.13
- Styrene monomer
- Toluene
- Triclosan
- Tris(nonylphenyl) phosphite (TNPP)



This determination is based upon information available as of the date of this submission, which primarily includes component supplier disclosures and Safety Data Sheets (SDSs). It may also include technical data sheets; any additional information provided by suppliers; testing, if applicable and available; and/or general industry knowledge. Many of the listed chemicals are naturally occurring elements or compounds or are ubiquitous in the environment and may be present in trace quantities. The Company does not conduct testing for all the listed compounds.

This letter shall apply to materials listed above as shipped and as of the date of shipment. This statement does not alter, amend, supersede or in any way affect any existing terms and conditions of sale of any transaction documents between the parties, including the Company's terms and conditions of sale and/or any contracts or contractual commitments between the parties. This letter supersedes all previous letters provided by the Company to you for the Products and covers only Products shipped by the Company within three (3) years after the date written above, unless revoked earlier.

A handwritten signature in dark ink that reads "Sue Quick".

Sue Quick
Sr. Director, Product Stewardship
WestRock CP, LLC
A Smurfit Westrock company