

Confirmation regarding Regulation (EU) 2025/40 on Packaging and Packaging Waste

Dear Sir or Madam,

Regulation (EU) 2025/40 on packaging and packaging waste entered into force on 11 February 2025 and, pursuant to Article 71 PPWR, has been applicable since 12 August 2026.

Nordmann, Rassmann GmbH (hereinafter: “*Nordmann*”) is thoroughly and diligently addressing the requirements of the Regulation. In doing so, we continuously monitor ongoing regulatory developments, in particular the publication of harmonised standards, guidance documents, as well as pending implementing and delegated acts, and assess their impact on our business activities. Nordmann is committed to implementing all applicable requirements of the PPWR in a timely manner and to the best of its knowledge and belief, while continuously developing the processes required for compliance.

The PPWR establishes different obligations for the various economic operators throughout the supply chain. Depending on the respective supply chain constellation, Nordmann acts as manufacturer, importer, or distributor.

For private-label products for which Nordmann acts as the **manufacturer** within the meaning of the PPWR, we carry out conformity assessments and prepare the required EU declarations of conformity as well as the associated technical documentation. These documents are maintained and can be made available to the competent authorities and, where legally required, to the relevant economic operators within the supply chain upon request.

For packaged materials that we place on the market from a third country, Nordmann acts as an **importer** under the PPWR. This includes fulfilling the required due diligence obligations prior to making such products available on the Union market, as well as obtaining and retaining the relevant conformity and supporting documentation. To this end, Nordmann maintains close communication with its suppliers established outside the EU and continuously works to obtain, review, and keep up to date the information and documentation required under the PPWR.

For packaged materials that Nordmann makes available on the Union market without acting as manufacturer or importer, we assume the role of **distributor** under the PPWR. In this capacity, Nordmann recognises its applicable due diligence obligations and requires its EU suppliers to comply with all applicable legal requirements, including the PPWR. This is supported through established compliance processes and contractual arrangements.

Irrespective of the specific requirements of the PPWR, Nordmann is committed to high compliance standards and to the principles set out in the [Nordmann Code of Conduct](#). Compliance with applicable legal requirements, as well as their ongoing consideration considering regulatory developments, forms an integral part of our business activities. We are committed to always fulfilling our legal and social responsibilities throughout the supply chain with due care.

Should you have any questions, please do not hesitate to contact us.

Yours faithfully,



i.V. Dr. Christian Gradert

Group HSEQ & Sustainability Director