

DECLARATION OF COMPLIANCE FOR MATERIALS AND ARTICLES INTENDED TO COME IN CONTACT WITH FOOD

MANUFACTURER

The manufacturer or his authorized representative established in the Community:

Name of the manufacturer: Packaging Donckers
Complete address: Kelderveld 8, 2500 Lier, Belgium
Contact: Mr. Van Humbeeck
Email: info@packaging-donckers.com

Tel: +32(0)15.24.28.80
Fax: +32(0)15.24.28.81

PRODUCT DESCRIPTION

Product name: ONE SIDED MF PET COATED VIRGIN CARDBOARD
Type of board: Recycled cardboard
Grammage cardboard: 325g/m²

COMPLIANCE STATEMENT

Producer of film declare, that PET colored is in compliance with:

- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food.
- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food and its amendments
- German BfR Recommendations on Food Contact Materials (XVII)
- US FDA regulation (21 CFR 177.1630 - Polyethylene Phthalate Polymers)
- Regulation 1895/2005- Epoxy derivatives and recycled materials are not intentionally added into the product.
- EU 1907/2006 REACH
- Resolution AP (89) 1 on the use of colorants in plastic material coming in contact with food.
- European Directive 94/62/EC

Cardboard Accurate quality is produced to the generally approved technical requirements and complies with:

- Foodstuffs and Animal Feeding Code – LFGB of the Federal Republic of Germany in the version of the notification of 03 June 2013 (BGBl. I S. 1426), last modified by art. 4 paragraph 19 of the law of 18 July 2016 (BGBl. I p. 1666), paragraph 30 and 31.

- Recommendation XXXVI "paper, cartons and cartonboard for food packaging" of the "Bundesinstitut für Risikobewertung", 34th notification, federal law gazette 10, 14 (1967), including the 220th memorandum, Federal Health Journal 59, 1365-1368, state of 1 July 2016.
- Requirements of the resolution of the European Council AP (2002) 1 about paper, cartons and cartonboard for food contact of 17 September 2002, whereupon instead of the techn. doc. 1 which is not implemented up to now the stated list of factoryadditives of the recommendation XXXVI of the German "BfR" have been consulted.
- Austrian regulations particularly with the food packaging regulations (LMSVG of 20 January 2006, BGBl. I, no. 13/2006).
- The provisions of the regulation (EC) No. 1935/2004 of the European Parliament and the Council of 27 October 2004
- Regulation (EC) No. 2023/2006 of the European Parliament and the Council of 22 December 2006 concerning materials and articles which are intended to be brought into contact with foods.

The adhesive partly meets requirements of the Regulation EU 10/2011 with its revisions, Annex I "Substances" and Annex II "Restrictions on materials and articles"

This declaration was made on the basis of the declaration of conformity provided by the producers of raw materials used for production.

It is the responsibility of the user to test the suitability of our products for the intended application.

We recommend that these boards are processed within 12 months of the production date.

SPECIFIC MIGRATION

This material contains substances which are subject to restrictions on use in food or contain specific migration limits according to EU Regulation 10/2011. It is hereby stated that this restriction has been taken into use and the specific migration limits have not been exceeded.

Adhesive

For the components listed below, restrictions apply which are to be followed with regard to the finished products which (may) come into contact with food:

- Ref. no. 10690: SML=6mg/kg
- Ref. no. 10780: SML=6mg/kg
- Ref. no. 11500: SML=0,05mg/kg
- Ref. no. 11830: SML=6mg/kg
- Ref. no. 17050 SML=30mg/kg
- Ref. no. 20020: SML=6mg/kg
- Ref. no. 21130: SML=6mg/kg
- Ref. no. 33801 SML=30mg/kg
- Ref. no. 77708 SML=1,8mg/kg
- Ref. no. 77897 SML=5mg/kg

- Ref. no. 86880 SML=9mg/kg
- Ref. no. 91530 SML=5mg/kg
- Ref. no. 9185 SML=2mg/kg

The composition of adhesive contain components not listed in the regulation EU 10/2011. For this materials opinions of the EFSA or the BFR Committee for Consumer Products are available. The following SMLs are defined:

- Silver chloride on titanium dioxide: 0,5mg Ag/kg food (EFSA Journal 2007; doi:10.2903/j.efsa.2007.555)
- Mixture of CIT and MIT: 25µ/dm²; (EFSA Journal 2010; doi: 10.2903/j.efsa.2010.1541).
- Adipic acid dihydrazide: 0,05 mg/kg (EFSA Journal 2015; doi: 10.2903/j.efsa.2015.3961).
- 4-acryloamido-4methyl-2-pentanone: 0,05mg/kg(EFSA-Journal 2015; doi: 10.2903/j.efsa.2015.4283)
- Propylene based glycol ethers: 5mg/kg (17th session of the BfR Committee for Consumer Products 2016)

PET layer

Colored film meet requirements for the limit values of the substances limited by their specific migration limits

(SML):

According to the Annex I of Commission Regulation 10/2011:

- terephthalic acid, CAS 100-21-0, SML=7,5 mg/kg
- isophthalic acid, CAS 121-91-5, SML=5,0 mg/kg
- acetaldehyde, CAS 75-07-0, SML=6,0 mg/kg
- ethyleneglycol, CAS 107-21-1, SML= 30 mg/kg
- diethyleneglycol, CAS 111-46-6, SML=30 mg/kg
- antimony trioxide, CAS 1309-64-4, SML=0,04 mg/kg (expressed as antimony)
- acrylic acid, CAS 79-10-7, SML=6 mg/kg
- 1,4-butanediol, CAS 110-63-4, SML=5 mg/kg

According to the Annex II of Commission Regulation 10/2011:

- Metals (Ba, Co, Cu, Fe, Li, Mn, Zn)
- Primary aromatic amines

- Overall migration (OML) – food simulant, test conditions

- 10% ethanol, (40±2)°C/10 days
- 3% acetic acid, (40±2)°C/10 days
- 95% ethanol, (40±2)°C/10 days
- isooctane, (23±2)°C/2 days
- olive oil, (40±2)°C/10 days

- Specific migration (SML) - food simulant, test conditions

- 10% ethanol, (60±2)°C/10 days
- 3% acetic acid, (60±2)°C/10 days
- 95% ethanol, (50±2)°C/25 days
- isooctane, (40±2)°C/4 days
- olive oil, (60±2)°C/10 days

DUAL-USE ADDITIVES

Dual use additives according to EU VO 10/2011 are additives that are permitted for the production of plastic materials & articles and are simultaneously permitted as a food additive or flavor / color.

This material can contain the following dual use additives:

- E1520 propane- 1,2 diol
- E171 titanium dioxide
- E509 phosphoric acid

FLUORIDIZED SUBSTANCES

(Danish Order on food contact materials nr. 681 25 May 2020)

We herewith declare that based on information given by our suppliers; this article is manufactured without and fluorinated polymers and therefore also without fluorinated compounds (PFCs such as PFOS and PFOA).

DISCLAIMER

This declaration is only valid under the following conditions:

- The product is used in normal intended conditions and purposes (use).
- No changes and / or substances (intentional, non-intentional and / or through use) are applied to the product and / or added that the nature and composition (a degeneration and / or a denaturation) of the product could be affected.
- The product may only be used for the foods, contact times and contact temperatures stated in this declaration.

Limiting factors:

- Our products are only suitable for single use. When re-used, mechanical and / or other properties are changed, the food suitability is not guaranteed and is not covered by this document.
- Our products are not suitable for packaging food for infants.

It is the sole responsibility of the user to check and test whether the product is suitable for its intended use, the shelf life of the food, the compatibility between the food and the product.

It is the sole responsibility of the user to test whether the product does not alter the organoleptic properties and / or composition of the food.

The information stated in this statement was provided by the supplier of the relevant product(s).

Signature + stamp:


Steven VAN HUMBEECK
CEO

DECLARATION OF COMPLIANCE FOR MATERIALS AND ARTICLES INTENDED TO COME IN CONTACT WITH FOOD

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PRODUCT DESCRIPTION

Product name: ONE SIDED PET COATED VIRGIN CARDBOARD
Type of board: Virgin cardboard
Type of PET: Gloss
Grammage cardboard: 325g/m²

DECLARATION OF SINGLE COMPONENT CONFORMITY

Cardboard

Complies with:

- the Foodstuffs and Animal Feeding Code – LFGB of the Federal Republic of Germany in the version of the notification of 03 June 2013 (BGBl. I S. 1426), last modified by art. 1 of the law of 30 June 2017 (BGBl. I p. 44), paragraph 30 and 31.
- The recommendation XXXVI "paper, cartons and cartonboard for food packaging" of the "Bundesinstitut für Risikobewertung", 34th notification, federal law gazette 10, 14 (1967), including the 222nd memorandum, Federal Health Journal 63, 133 - 134, state of 9 January 2020.
- The requirements of the resolution of the European Council AP (2002) 1 about paper, cartons and cartonboard for food contact of 17 September 2002, whereupon instead of the techn. doc. 1 which is not implemented up to now, the stated list of factory additives of the recommendation XXXVI of the German "BfR" have been consulted.
- Austrian regulations particularly with the food packaging regulations (LMSVG of 20 January 2006, BGBl. I, no. 13/2006).
- Regulation (EC) No. 1935/2004 of the European Parliament and the Council of 27 October 2004
- Regulation (EC) No. 2023/2006 of the European Parliament and the Council of 22 December 2006 concerning materials and articles

Ink

Complies with:

- European Parliament and Council Regulation (EC) 1935/2004/EG
- European Parliament and Council Directive 94/62/EC and the latest amendment
- Directive 10/2011 / EC. Concerning plastic materials intended to come into

contact with food and its amendments

- Directive 2023/2006 / EC. Concerning Good Manufacturing Practices for materials intended to come into contact with food.

PET layer

Complies with:

- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food and its amendments
- Directive 282/2008/EC against recycled materials and articles to come into contact with food
- Directive 450/2009/EC against intelligent materials
- Directive 1895/2005/EC against epoxy derivatives
- Directive on EU/2018/2019 against Bisphenol A in varnishes and coatings to come into contact with food

Adhesive

Complies with:

- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food.
- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food and its amendments

This declaration was made on the basis of the declaration of conformity provided by the producers of raw materials used for production.

It is the responsibility of the user to test the suitability of our products for the intended application.

GLOBAL MIGRATION

PET layer

Method: According with reference to EN 1186:2002

Simulant Used	Test Condition	Results (mg/dm ²)	Permissible Limit (mg/dm ²)
Tanex (Oil substance)	2hrs@175°C	<2	10
3% Acetic acid	10days@20°C	<2	10
3% Acetic acid	10days@40°C	<2	10
10% Ethanol	10days@20°C	<2	10
10% Ethanol	10days@40°C	<2	10
20% Ethanol	10days@20°C	<2	10
20% Ethanol	10days@40°C	<2	10
50% Ethanol	10days@40°C	<2	10
50% Ethanol	10days@40°C	<2	10
Isooctane	2hrs@70°C	4.7	10
Comment	---	PASS	---

SPECIFIC MIGRATION

This material contains substances which are subject to restrictions on use in food or contain specific migration limits according to EU Regulation 10/2011. It is hereby stated that this restriction has been taken into use and the specific migration limits have not been exceeded.

PET LAYER

Specific migration on heavy metals:

Method: with reference to EN 13130-1-2004 analysis was performed by ICP-OES
Stimulant Used: 3% Acetic Acid (W/V) Aqueous Solution
Test Condition: 10days @60°C

Test Item	Unit	Max Permissible Limit (mg/kg)	MLD	Test Result
Aluminum	mg/kg	1	0.1	ND
Barium	mg/kg	1	0.1	ND
Cobalt	mg/kg	0.05	0.01	ND
Copper	mg/kg	5	0.25	ND
Iron	mg/kg	48	0.25	ND
Lithium	mg/kg	0.6	0.5	ND
Magnesium	mg/kg	0.6	0.25	ND
Zinc	mg/kg	25	0.5	ND
Zinc*	mg/kg	5	0.5	ND
Antimony	mg/kg	0.04	0.01	ND
Comment	---	---	---	PASS

Specific migration on terephthalic acid:

Method: sample preparation with reference to EN 13130-1:2004; analysis was performed by LC-DAD

Test Condition: 3% Acetic Acid (W/V) Aqueous Solution

Test Condition: 10days @60°C

Test Item	Max Permissible Limit (mg/kg)	MLD	Test Result
Migration times	---	---	First
Area/volume	---	---	6.0
Specific Migration of terephthalic acid	7.5	1.0	ND
Comment	---	---	PASS

Specific migration on ethylene glycol and diethylene glycol

Method: sample preparation with reference to EN 13130-1:2004; analysis was performed by GC-FID

Test Condition: 3% Acetic Acid (W/V) Aqueous Solution

Test Condition: 10 days @60°C

Test Item	Unit	MLD	Test Result
Migration times	---	---	First
Area/volume	dm ² /kg	---	6.0
Specific Migration of ethylene glycol	mg/kg	15	ND
Specific Migration of ethylene glycol	mg/kg	15	ND

The SML of following chemical substances are amended as per Regulation in EU No 10/2011

FCM Substance No	CAS No	Substance Name	SML (mg/kg)
1066	23985-75-3	1,2,3,4-tetrahydronaphtalene-2,6-dicarboxylic acid dimethyl ester	0.05
1068	2530-83-8	(3-(2,3-epoxypropoxy) propyl) trimethoxy silance	NA

FCM Substance No	CAS No	Substance Name	Proposed SML (mg/kg)
822	-	Perchloric acid, salts	0.002
974	939402-02-5	Phosphorous acid, mixed 2,4-bis (1,1-dimethylpropyl) phenyl and 4-(1,1-dimethylpropyl) phenyl triesters	10

ADHESIVE

For the components listed below, restrictions apply which are to be followed with regard to the finished product which (may) come into contact with food:

Ref.-Nr.10690: SML = 6 mg/kg; Ref.-Nr.10780: SML = 6 mg/kg; Ref.-Nr.11500: SML = 0,05 mg/kg;
Ref.-Nr.12100: SML = 0,01 mg/kg; Ref.-Nr.17050: SML = 30 mg/kg; Ref.-Nr.33801: SML = 30 mg/kg;
Ref.-Nr.66755: SML = 0,5 mg/kg; Ref.-Nr.77708: SML = 1,8 mg/kg; Ref.-Nr.77897: SML = 5 mg/kg;
Ref.-Nr.86880: SML = 9 mg/kg; Ref.-Nr.91530: SML = 5 mg/kg; Ref.-Nr.17260/54880: SML = 15 mg/kg;
Ref.-Nr.52000: SML = 30 mg/kg

Ink

The SML of following chemical substances are amended as per Regulation in EU No 10/2011 and Swiss Ordinance:

FCM Substance	Cas N°	Substance name	SML (mg/kg) VO 10/2011	SML (mg/kg) Swiss ordinance
BLACK				
411	0001333-86-4	carbon black	60	60
562	0009004-70-0	nitrocellulose	60	60
	0109037-78-7	Titanium, butyl phosphate ethyl alcohol, isopropyl alcohol complexes		0,01
	0010402-16-1	Oleic acid, copper salt		27,1
113	0000064-17-5	ethanol	60	60
118	0000067-63-0	2-propanol	60	60
GREEN				
562	0009004-70-0	nitrocellulose	60	60
610	0013463-67-7	titanium dioxide	60	60
410	0001332-58-7	kaolin	60	60
549	0009002-88-4	polyethylene wax	60	60
94	0008002-74-2	waxes, refined, derived from petroleum based or synthetic hydrocarbon feedstocks, high viscosity	60	60
639	0025322-69-4	polypropyleneglycol	60	60
418	0001344-28-1	aluminium oxide	60	60
	0087553-57-9	1-Octadecanaminium, N,N-dimethyl-N-octadecyl-, salt with 4-[[2-[[3,3'-dichloro-4'-[[2-oxo-1-[(phenylamino)carbonyl]propyl]azo][1,1'-biphenyl]-4-yl]azo]-1,3-dioxobutyl]amino]benzenesulfonic acid (1:1)		0,01
	0073455-75-1	Copper phthalocyanine, sulphonated, compound with dodecylamine		0,01
	0127179-40-2	1-Octadecanaminium, N,N-dimethyl-N-octadecyl-, salt with 4,4'-[(3,3'-dichloro[1,1'-biphenyl]-4,4'-diyl)bis[azo(2-acetyl-1-oxo-2,1-ethanediy)imino]]bis[benzenesulfonic acid]		0,01
	0094581-17-6	Resin acids and Rosin acids, maleated, esters with pentaerythritol		0,01
	0109037-78-7	Titanium, butyl phosphate ethyl alcohol, isopropyl alcohol complexes		0,01
FCM	Cas N°	Substance name	SML	SML

Substance			(mg/kg) VO 10/2011	(mg/kg) Swiss ordinance
GREEN				
515	0007732-18-5	water	60	60
113	0000064-17-5	ethanol	60	60
118	0000067-63-0	2-propanol	60	60
327	0000141-78-6	acetic acid, ethyl ester	60	60
122	0000071-23-8	1-propanol	60	60
ORANGE				
610	0013463-67-7	titanium dioxide	60	60
562	0009004-70-0	nitrocellulose	60	60
410	0001332-58-7	kaolin	60	60
549	0009002-88-4	polyethylene wax	60	60
94	0008002-74-2	waxes, refined, derived from petroleum based or synthetic hydrocarbon feedstocks, high viscosity	60	60
418	0001344-28-1	aluminium oxide	60	60
	0109037-78-7	Titanium, butyl phosphate ethyl alcohol, isopropyl alcohol complexes		0,01
515	0007732-18-5	water	60	60
113	0000064-17-5	ethanol	60	60
118	0000067-63-0	2-propanol	60	60
327	0000141-78-6	acetic acid, ethyl ester	60	60
122	0000071-23-8	1-propanol	60	60

FCM Substance	Cas N°	Substance name	SML (mg/kg) VO 10/2011	SML (mg/kg) Swiss
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				ordinance
FUCHSIA				
610	0013463-67-7	titanium dioxide	60	60
562	0009004-70-0	nitrocellulose	60	60
410	0001332-58-7	kaolin	60	60
418	0001344-28-1	aluminium oxide	60	60
549	0009002-88-4	polyethylene wax	60	60
94	0008002-74-2	waxes, refined, derived from petroleum based or synthetic hydrocarbon feedstocks, high viscosity	60	60
	0109037-78-7	Titanium, butyl phosphate ethyl alcohol, isopropyl alcohol complexes		0,01
515	0007732-18-5	water	60	60
113	0000064-17-5	ethanol	60	60
118	0000067-63-0	2-propanol	60	60
327	0000141-78-6	acetic acid, ethyl ester	60	60
122	0000071-23-8	1-propanol	60	60

Note INK: For those substances with no specific restriction, a default migration limit of 60mg/kg food has been used.

DUAL-USE ADDITIVES

Dual use additives according to Eu Vo 10/2011 are additives that are permitted for the production of plastic materials & articles and are simultaneously permitted as a food additive or flavor / color.

This material can contain the following dual use additives:

DUAL USE ADDITIVES	E-N°
Propaan-1,2-diol (Propeenglycol)	E1520
Ammonium Hydroxide	E527
Silicon dioxide	E551
Kaolin	E559
Carbon black	E152
Titanium Dioxide	E171

FLUORIDIZED SUBSTANCES

(Danish Order on food contact materials nr. 681 25 May 2020)

This product is manufactured without any fluoroinated polymers and therefore also without fluorinated compounds. Current measurements of the total organic fluor content showed levels below the proposed indicator value of 20 µg organic fluoride/g of paper.

Currently no methods are available to determine migration of the traces present.

VALIDITY

This statement is valid until 31.12.2022

DISCLAIMER

This declaration is only valid under the following conditions:

- The product is used in normal intended conditions and purposes (use).
- No changes and / or substances (intentional, non-intentional and / or through use) are applied to the product and / or added that the nature and composition (a degeneration and / or a denaturation) of the product could be affected.
- The product may only be used for the foods, contact times and contact temperatures stated in this declaration.

Limiting factors:

- Our products are only suitable for single use. When re-used, mechanical and / or other properties are changed, the food suitability is not guaranteed and is not covered by this document.
- Our products are not suitable for packaging food for infants.

It is the sole responsibility of the user to check and test whether the product is suitable for its intended use, the shelf life of the food, the compatibility between the food and the product.

It is the sole responsibility of the user to test whether the product does not alter the organoleptic properties and / or composition of the food.

The information stated in this statement was provided by the supplier of the relevant product(s).

Signature + stamp:

Steven VAN HUMBEECK
CEO



DECLARATION OF COMPLIANCE FOR MATERIALS AND ARTICLES INTENDED TO COME IN CONTACT WITH FOOD

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Tel: +32(0)15.24.28.80
Fax: +32(0)15.24.28.81

PRODUCT DESCRIPTION

Product name: PVC BOX

COMPLIANCE STATEMENT

Product stated above complies with:

- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food
- Directive 2023/2006 / EC. Concerning Good Manufacturing Practices for materials intended to come into contact with food.
- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food and its amendments

In the following conditions of use:

Type of food intended to come into contact with material / article:

The overall migration results shows that the tested material may be used in contact with all types of foodstuff.

This material is not intended to come into contact with food for infants.

Storage time and temperature of the material / article:

To guarantee the product safety of the packaging, it is best packed inside stored protective against rain and snow. The packaging can be stored for a long time at room temperature or lower. The recommended storage conditions are at 40-70% relative humidity and 10-30° C. We recommend that these are processed within 12 months of the production date.

Possible treatment of the material / object:

Usage between -30°C en +55°C

Surface area / volume ratio

Theoretical assumption that 1 kg of food is packed with 6dm² of packaging.



Our products are standard products, if they are suitable for packaging all food products with the exception of acidic food, then it is not possible to calculate the actual surface / volume ratio for all applications. As a result, we base ourselves on the theoretical assumption mentioned above.

GLOBAL MIGRATION

Global migration tests have been conducted for simulant A, B and D with results conform usage for "all fatty food stuff" and usage between -30°C en +55°C.

SPECIFIC MIGRATION

This material contains substances which are subject to restrictions on use in food or contain specific migration limits according to EU Regulation 10/2011. It is hereby stated that this restriction has been taken into use and the specific migration limits have not been exceeded.

PM REFERENCE	CAS	NAME	SML
26110	0000075-35-4	Vinylidene chloride	ND
11710	0000096-33-3	acrylic acid, methyl ester	6 mg/kg
10690	0000079-10-7	Acrylic acid	6 mg/kg
33801	68411-30-3	Benzene sulphonic acid (n-alkyl(C10-C13) benzenesulphonic acid)	30 mg/kg
86880	-	Sodium monoalkyl dialkylphenoxybenzenedisulphonat	9 mg/kg

DUAL-USE ADDITIVES

No substances present in the PVC which are subject to a restriction in food as dual-use additives, as laid down in directives 95/31/EC, 95/45/EC, 2002/82/EC, regulation (EU) 1333 & 1334-2008 as amended.

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Signature + stamp:

Steven VAN HUMBEECK
CEO

