



DUE DILIGENCE STATEMENT REGARDING ENVIRONMENTAL AND REGULATORY COMPLIANCE WITH REQUIREMENTS RELATED TO PPWR AND EUDR

Applies to	packaging for products manufactured by Zakłady Porcelany Stołowej „Lubiana” S.A.
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1. Purpose of the statement

We hereby declare that **Zakłady Porcelany Stołowej „Lubiana” S.A.** carries out activities aimed at ensuring that the packaging it uses complies with applicable European Union law and with requirements relating to safety, environmental protection and sustainable development principles.

Our management system takes into account requirements arising, among others, from:

- Regulation (EU) 2025/40 on packaging and packaging waste (PPWR),
- Regulation (EU) 2023/1115 on deforestation-free products (EUDR),
- Directive 94/62/EC on packaging and packaging waste (to the extent still in force),
- applicable regulations on materials intended to come into contact with food – where applicable,
- internal quality, environmental and supply chain management procedures.

2. Compliance with PPWR requirements

In the course of our operations we use unit, group and transport packaging intended for packing, storing and transporting porcelain products. These are, in particular, packaging made of paper, cardboard, plastics, wood and other auxiliary materials used to protect the products.

The process of ordering and using packaging for the storage and transport of porcelain products is carried out with regard to due diligence principles and the requirements arising from applicable and forthcoming regulations. In our purchasing and supplier qualification process we take into account requirements relating to the responsible sourcing of raw materials, product safety, reducing the environmental impact of packaging, and the expectations of our customers.

In particular:

- our packaging is designed with regard to the possibility of repeated processing within existing recycling systems;
- activities are carried out to reduce the weight of packaging while maintaining the required strength and functional parameters;
- requirements concerning packaging design, recycled material content, waste reduction and information obligations arising from PPWR are monitored.

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District Court Gdańsk-Północ | Commercial Division of the National Court Register, No. 0000063845 |
591-000-41-44 | BDO 000000976 | Share capital: PLN 2,015,248.00, paid up in full



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- the selection of protective packaging (including foams and bubble wrap) results from the need to protect fragile porcelain products from damage during transport, which we take into account when assessing the requirements on minimising empty space in packaging (Article 10 PPWR);
- with regard to plastic packaging components, we monitor the requirements on the minimum content of recycled materials (Article 7 PPWR) and remain in contact with our suppliers on this matter;
- as an entity placing packaging on the market, we fulfil the registration and reporting obligations arising from extended producer responsibility (including in the national BDO register), to the extent applicable to our operations.

The requirements on restricting the use of substances of concern (including PFAS) in materials intended for direct contact with food (Article 5 PPWR) do not apply to our transport and group packaging – table porcelain does not constitute food-contact packaging within the meaning of these regulations.

Manufacturer	Producer	Importer	Distributor	Supplier
✓	✓		✓	✓ / partially

Placing packaging on the EU market	Yes	No
	✓	

Types of packaging	Unit	Group	Transport
	✓	✓	✓

Main component materials	Status / examples from Lubiana
Paper (PAP 22)	✓ kraft paper, kraft tissue paper,
Corrugated board / carton (PAP 20,21)	✓ corrugated board 2W,3W,5W: flute E, B, EB, unit and group cartons, trays and fillers
Labels and self-adhesive materials (PE, PP, PAP 21)	✓ ✓ labels: thermal-transfer coated paper, PE films, matte paper, customer stickers and markings, leaflets - coated paper
Paper bags and envelopes (PAP 22)	✓ paper bags, paper envelopes
Wood / wood-based materials (FOR 50)	✓ wooden pallets
Plastics – films (PE, LDPE)	✓ LDPE 4 shrink film, PE stretch film, PE bubble film, transparent / self-adhesive LDPE films,
Plastics - foams and protective materials (PE)	✓ PE foam, PE bubble film and other protective elements
Adhesive and transfer tapes (PP, PAP 22, OTHER 7)	✓ PP packing tape, plain and printed, and paper tape, transfer tapes
Metal (FE 40)	✓ bookbinding wire, galvanised wire, auxiliary elements used in packing or protection
Multi-material materials (OTHER 7)	✓ a transparent film label (PP, PET) with an adhesive layer, paper-film laminate (OTHER 7)

Detailed data for each packaging item:	name, material, dimensions L×W×H [mm], grammage [g/m ²], empty weight [g], annual usage [pcs]
Due to the very large number of packaging item codes (several thousand items), detailed data is available on request for specific item codes.	

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3. Recyclability of packaging and due diligence in the supply chain

The packaging ordered and used by Zakłady Porcelany Stołowej „Lubiana” S.A. is selected taking into account its protective function, transport requirements, customer expectations, and the possibility of its disposal or recovery after use. The effectiveness of the recycling process may also depend on additional elements, such as:

- labels,
- adhesives,
- inks and varnishes,
- decorative elements
- bookbinding wire

In particular, we pay attention to the following aspects with our packaging suppliers:

- the type of cardboard/paper used,
- the recoverability of paper fibres,
- the impact of prints, varnishes, laminates, films and adhesives on the recycling process,
- the use of solutions consistent with current guidelines on designing packaging for recycling.

We expect our packaging suppliers to ensure that the packaging supplied:

- is designed in accordance with principles enabling recycling,
- meets the requirements of applicable regulations on packaging and packaging waste,
- uses materials appropriate to the intended use,
- is manufactured in compliance with quality, environmental and legal requirements.

For projects carried out jointly with customers and packaging suppliers, we aim to select solutions that reduce the environmental impact of packaging. We recommend the use of materials consistent with industry guidelines on designing packaging for recycling.

At the customer's request, we can cooperate in assessing the impact of the decorations and additional elements used on the recyclability of the finished packaging.

% of PCR recycled content in the packaging material (currently):	Data is being collected from suppliers of plastic components; target values will be agreed in stages in line with the deadlines resulting from PPWR
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Recyclability (EN 13430 or RecyClass)

Yes – EN 13430	Yes - RecyClass	In progress	No
		✓	

Declaration of absence of SVHC substances (REACH):

Yes - confirmed	No	Requires verification
		✓

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Verification of the absence of SVHC substances (REACH) in packaging materials is carried out in stages in cooperation with suppliers; confirmations will be added for individual packaging item codes as they are obtained.

4. Labelling and marking

We are aware of the new packaging labelling requirements arising from PPWR.

When commissioning packaging, we expect manufacturers to ensure the ability to produce the packaging, and designers to ensure marking in accordance with the requirements relating, among others, to:

- material marking,
- recycling information,
- other information arising from the regulations applicable in the target market.

The scope of information placed on packaging is agreed on a case-by-case basis with the packaging supplier and, where necessary, with the end customer.

Additionally:

- we monitor requirements relating to future marking obligations;
- we ensure the ability to adapt products to applicable technical requirements;
- we cooperate with customers in implementing new markings required by regulations, if such an expectation exists.

At the same time, we are aware that ultimate responsibility for the compliance of the finished product's labelling with legal requirements rests with Zakłady Porcelany Stołowej „Lubiana” S.A. as the entity placing the product on the market, unless the parties agree otherwise.

Material labelling (Article 26 PPWR):

Material labelling of packaging is applied in accordance with applicable legal provisions and customer requirements. In the case of packaging supplied by manufacturers or customers, material markings are applied to the extent required by law and on the basis of information provided by the supplier or customer. The entity providing this information is responsible for the accuracy of the data on material composition.

5. Compliance with EUDR

Paper, cardboard, wood and wood-based materials used in packaging or auxiliary materials may be subject to the requirements of Regulation (EU) 2023/1115 (EUDR).

In connection with this, we require our suppliers to:

- implement measures ensuring compliance with EUDR;
- provide declarations and documents confirming the compliance of the materials supplied;
- apply due diligence systems, where required by the regulations;
- inform us of changes that may affect the compliance of the packaging supplied.

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- provide, where required, Due Diligence Statements together with the reference number from the EU information system, for materials falling within the scope of EUDR.

At the same time, EUDR requirements may apply to auxiliary materials and transport packaging containing forest-derived products, such as:

- wooden pallets,
- paper dividers,
- cartons,
- group packaging,
- elements made of wood or paper.

With regard to these materials:

- we cooperate with qualified suppliers,
- we require appropriate declarations of conformity,
- we develop due diligence procedures compliant with EUDR,
- we provide customers with relevant information to the extent arising from applicable regulations.

With regard to purchased wood-based and paper materials (including pallets, dividers and cartons), Zakłady Porcelany Stołowej „Lubiana” S.A. acts in the supply chain as an entity purchasing these materials from qualified EU-market suppliers. The scope and manner of fulfilling EUDR obligations is determined separately for individual categories of materials, in accordance with applicable regulations and their current state of implementation.

6. FSC® / PEFC certification

In the case of supplies of materials with FSC certification:

- we verify suppliers as part of their qualification and assessment process,
- we cooperate with suppliers holding valid FSC certificates,
- on the basis of documentation provided by suppliers, we maintain traceability of the origin of FSC-certified materials throughout their supply chain,
- Zakłady Porcelany Stołowej „Lubiana” S.A. does not hold its own FSC/PEFC certificate; any FSC markings appearing on materials originate solely from certified suppliers and are used in accordance with their licence, and not on the basis of the Company’s own certificate.

FSC or PEFC certification:

Information regarding FSC/PEFC certification, including certificate numbers and validity periods, may be made available at the customer’s request for specific suppliers, materials or packaging item codes.

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7. Responsible sourcing of raw materials

As part of supply chain management:

- we qualify suppliers in accordance with internal procedures,
- we assess suppliers' compliance with quality and environmental requirements,
- we promote the use of secondary raw materials and materials from responsible sources.

Availability of technical documentation (TDS)	Yes - within 10 business days	Partially	No	Depending on supplier availability
		✓		✓

8. Summary

This statement by Zakłady Porcelany Stołowej „Lubiana” S.A. reflects our approach to due diligence regarding packaging, PPWR and EUDR requirements, and responsible supply chain management. It does not constitute a declaration of conformity issued by a packaging manufacturer, nor does it replace technical documents, certificates, supplier declarations or other documents required for specific materials, packaging item codes or target markets.

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