



DECLARATION OF COMPLIANCE FOR EU PPWR

Packaging and Packaging Waste Regulation (EU) 2025/40 ("PPWR")

Monarch International, Inc. dba Monarch Instrument ("Monarch") hereby declares that, to the best of its knowledge and based on supplier-provided material specifications, technical data, and regulatory information, the packaging and packaging materials it supplies conform to the requirements identified in this declaration to the extent such requirements have been evaluated and verified by Monarch.

This declaration relates to packaging only. It is provided to support Monarch's customers who place packaging on the European Union market in meeting their obligations under Regulation (EU) 2025/40 on packaging and packaging waste ("PPWR"). As a manufacturer established outside the European Union, Monarch is not itself the economic operator responsible for placing packaging on the EU market.

Exclusions. This declaration does not necessarily apply to durable carrying cases, instrument kit cases, storage boxes, reusable transport containers, or associated custom-fitted inserts, dividers, foam components, and similar items that are designed and intended for long-term retention and repeated use by the customer. Such items may be considered product accessories or components rather than packaging based on their design, intended use, and applicable regulatory interpretation.

Current Status of Monarch Packaging

1. Substance Restrictions (Article 5)

The combined concentration of lead, cadmium, mercury, and hexavalent chromium does not exceed 100 mg/kg. The packaging also complies with applicable substance restrictions under Annex XVII of REACH Regulation (EC) No. 1907/2006. PFAS restrictions under the PPWR apply to food-contact packaging and are therefore not applicable to Monarch's instrument packaging.

2. Minimization (Article 10)

Where Monarch controls the packaging specification, packaging materials are selected and used in quantities that are reasonably necessary to ensure safe handling, storage, and transportation of shipped products while balancing protection requirements, material minimization, and waste reduction.

Packaging configurations vary by shipment based on the products ordered, transportation requirements, and the level of protection necessary to reduce transit-related damage.

Monarch supplies instruments, sensors, accessories, and spare parts in a wide range of sizes and configurations. Packaging requirements therefore vary by order. Outer packaging is selected to accommodate the shipped contents while seeking to minimize unused space and the amount of protective material required, taking into account applicable transportation, labeling, and customs documentation requirements.

Where suitable, Monarch also reuses packaging and cushioning materials received through its supply chain as filler for outbound shipments to reduce the consumption of new packaging materials.

Where products are supplied in durable storage cases, instrument kits, or reusable transport containers intended for long-term use by the customer, such items are intended to provide ongoing storage, transport, protection, and operational utility throughout the service life of the product rather than serving solely as disposable packaging.

Requirements Under Review or Planned for Future Implementation

3. Recyclability (Article 6)

Monarch is evaluating the recyclability performance of its packaging and reviewing supplier information to assess alignment with PPWR recyclability requirements. Monarch does not currently represent that all packaging has been assessed against, or demonstrated conformity with, Article 6 requirements.

4. Recycled Content (Article 7)

Monarch is working with its packaging suppliers to determine recycled-content levels, where applicable, and evaluate future compliance with PPWR recycled-content requirements. Such data is not currently available for all packaging supplied by Monarch.

5. Labelling and Traceability (Articles 12-13)

Monarch is monitoring the development of harmonized labelling and related implementing measures under the PPWR. Packaging may not currently bear all labelling elements contemplated by the Regulation. Monarch intends to implement additional labelling and documentation requirements as applicable regulatory obligations become effective.

Protective Packaging Materials.

Most Monarch products are precision instruments that require protection from shock, vibration, impact, and inadvertent activation during storage and transportation. **This discussion relates to packaging materials and does not apply to custom-fitted foam components forming part of durable carrying cases, storage cases, or instrument kits intended for long-term customer use.**

Protective materials, including foam inserts, foam pads, foam sheeting, bubble bags, and similar materials, are used only to the extent reasonably necessary to ensure product safety, support transportation requirements, and maintain the condition and functionality of products during shipment. Packaging methods vary according to the products being shipped and may include containment materials for smaller items, protective packaging for batteries and battery-containing products, and cushioning materials where testing or shipping experience has shown that alternative materials do not provide an equivalent level of protection during transportation.

Monarch seeks to minimize the quantity of protective materials used while reducing transit-related losses, replacement shipments, and associated waste.

Supporting Documentation

Upon request and where available, Monarch may provide packaging specifications, material composition information, packaging weights, supplier declarations, technical data sheets, and other supporting documentation relating to the packaging supplied.

Continued Review

Monarch is monitoring the phased implementation of PPWR requirements and intends to update its packaging practices and supporting documentation as additional implementing acts, technical standards, and compliance deadlines become applicable.

Signed for and on behalf of Monarch International, Inc. dba Monarch Instrument:



Meridith L. Kosiorek
Chief Administrative Officer

August 6, 2026

Date

NOTE: Regulation (EU) 2025/40 entered into force on 11 February 2025 and applies generally from 12 August 2026, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904 and repealing Directive 94/62/EC. Certain requirements apply on later dates. This declaration documents the status of Monarch's packaging with respect to selected PPWR requirements and does not release any economic operator from its own obligations under the Regulation. It is provided in good faith and is not a substitute for legal advice.