ATP adhesive systems AG, Sihleggstrasse 23, CH-8832 Wollerau

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Paul Schwitter
Tel: +41 43 888 15 15
Fax: +41 43 888 15 10
E-Mail: paul.schwitter@atp-ag.ch

Wollerau, 06th of August 2026

Statement in regard to PPWR

Dear Ladies and Gentlemen,

In the course of Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste ("PPWR") as well as national implementation provisions, extended obligations and responsibilities arise for all actors along the supply chain regarding products placed on the market and their packaging.
The ATP Group is consistently committed to ensuring that all packaging and materials provided by us comply with the applicable regulatory requirements of the European Union. This includes continuous alignment with the PPWR as well as compliance with relevant implementation deadlines.

1. Compliance Approach and Assurances of the ATP Group

Within the framework of our role in the supply chain, our internal governance and compliance processes are designed around the following key areas:
Compliance with protection standards: Support of all applicable regulations regarding material restrictions, product safety, and environmental protection.
Implementation of PPWR requirements: Timely consideration of provisions regarding heavy metal limits, recyclability, recycled content, packaging minimization, and labeling.
Specification review: Continuous review and updating of our packaging specifications based on the evolving legal situation.
Supplier management: Active engagement with partners and suppliers for the procurement and evaluation of relevant material data.

2. Documentation & Data Provided

Depending on the function in which we act under Article 3 PPWR in the respective business relationship (e.g., as distributor or importer), we provide our customers upon delivery with appropriate compliance documentation and relevant item data (including material composition, weights, customs tariff numbers, and declarations of conformity within the scope of our role).
Unless we act as a producer within the meaning of the PPWR, we do not provide full technical documentation pursuant to Annex VII; however, we are pleased to support you with the necessary basic data for your own assessments.

3. Transparent Division of Roles and Shared Obligations in the Supply Chain

In order to support you in complying with your own statutory requirements in the best possible way, we would like to point out the regulation-related division of roles in the supply chain:

Goods delivered by us are initially classified as "articles". As soon as you use these articles for packaging goods or combine them into new packaging units, they become "packaging" within the meaning of Art. 3(1) PPWR or national packaging laws.

This may give rise to independent statutory roles and obligations for you depending on further use and function (e.g., as a "producer" pursuant to Art. 3(13) PPWR to conduct your own conformity assessment procedures under Annex VII and issue a declaration of conformity under Annex VIII). We therefore recommend that you independently review and determine the roles and obligations applicable to your company based on the text of the Regulation.

Furthermore, the ATP Group actively monitors other relevant environmental legislation (such as the EU Deforestation Regulation (EU) 2023/1115/EUDR) and ensures compliance as soon as the corresponding obligations become legally binding.

This declaration is based on information currently available to the ATP Group and reflects our current compliance approach at the time of issuance.

Sincerely,

Kind regards,

Paul Schwitter
CCO ATP Group

ATP adhesive systems AG
Sihleggstrasse 23
CH 8832 Wollerau

Sitz der Gesellschaft: Wollerau
Amtsgericht: Wollerau
Geschäftsführer: Paul Schwitter

Telefon: 0041 43 888 15 15
Telefax: 0041 43 888 15 10
www.atp-ag.com / info@atp-ag.com