

DECLARATION OF COMPLIANCE FOR GLASS PACKAGING

1. Food contact and Migration of substances into foodstuff declaration

Legal bases, enactments, regulations, and directives:

- EC directive 1935/2004, dated 27th of October 2004 on materials and articles intended to come into contact with food.
- National Legislation of Turkey, Turkish Food Codex Regulation on materials and articles which are intended to come into contact with foodstuffs.
- Prop 65/California's Toxics in Packaging Prevention Act.
- Council Directive 84/500/EEC of 15 October 1984 on the approximation of the laws of the Member States relating to ceramic articles intended to come into contact with foodstuffs.
- Commission Directive 2005/31/EC of 29 April 2005 amending Council Directive 84/500/EEC as regards a declaration of compliance and performance criteria of the analytical method for ceramic articles intended to come into contact with foodstuffs.
- French Regulation - DGCCRF fiche MCDA no: 2 (version du 1.05.2016).
- Germany 64 Lebensmittel- und Futtermittelgesetzbuch (LFGB) B80.03-1 & B80.03-4.
- DPR (decree of Italian President Republic) 777/82 and following updates and amendments
- Italian Ministerial Decree of 21st March 1973 - Disciplina igienica degli imballaggi, recipienti, utensili, destinati a venire in contatto con le sostanze alimentari o con sostanze d'uso personale. 1973, Glass Category A.
- Danish 681/2000 Regulation BEK nr 681 af 25/05/2020 (Gaeldende) Bekendtgørelse om fødevarekontaktmaterialer og om straffebestemmelser for overtrædelse af relaterede EU-retsakter referring to Council Directive 84/500/EEC of 15 October 1984 on the approximation of the laws of the Member States relating to ceramic articles intended to come into contact with foodstuffs.
- Commission Regulation (EU) 2024/3190 of 19 December 2024 on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213
- Glazed Ceramics and Glassware Regulations SOR/2016-175

The simulant(s) and test conditions:

Migration testing is performed based on 84/500/EEC Directive and in accordance with ISO 7086-1 and ISO 7086-2, 4% (v/v) acetic acid for 24±0.5h at 22±2°C is used to extract lead (Pb) and cadmium (Cd) from the inner surface.

As Türkiye Şişe ve Cam Fabrikaları A.Ş., we manufacture glass containers from soda-lime-silica glass. We declare that our products,

- Do not endanger human health,
- Do not cause an unacceptable modification to the composition of the foodstuff.
- Do not deteriorate the organoleptic characteristics of the foodstuff.

We declare that our soda-lime-silica glass containers comply with:

- Regulation (EC) No 1935/2004
- Regulation (EC) No 2023/2006

Due to the inert nature of glass and its non-porous structure, no migration of substances into food occurs under normal and foreseeable conditions of use.

Therefore, our glass containers are suitable for contact with foodstuffs and beverages.

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The classification of food (acidic, alcoholic, aqueous, fatty, dairy and dry) is based on the food categories defined in Regulation (EU) No 10/2011 and is used for reference purposes only.

2. Coatings

The components of external coatings applied to prevent scratches occurring during the conveying and transporting of the containers and to ease the moving of containers during the filling process are indirect additives.

The cold-end coating material applied to the product does not come into contact with the inner surface of the glass packaging and, therefore, does not interact with the food contained within. This application is carried out in compliance with Good Manufacturing Practices (GMP) and in accordance with Regulation (EC) No 1935/2004, Regulation (EC) No 2023/2006, and relevant legislation on food contact materials and articles.

Applications of glass coatings can be said to fully comply with the Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations provided that the coating is applied to the exterior (nonfood contact side) and below the thread or lip of glass food and beverage bottles and the process conforms to good manufacturing practices outlined in 21 CFR, Sec. 174.5. Since there is no intended contact between the glass coatings and food packaged in the container and any incidental deposition on the interior or lip line of the bottle would not reasonably be expected to become components of food, the coatings are not considered food additives within the meaning of Section 201 (s) of the Act and would not require amendment to food additive regulations.

3. Good Manufacturing Practice (GMP-Regulation) declaration

Legal bases, enactments, regulations, and directives:

- EC directive 2023/2006/EC dated 22nd of December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.

As Türkiye Şişe ve Cam Fabrikaları A.Ş., we manufacture glass containers from soda-lime-silica glass. We declare that our products are compliant with the regulation on good manufacturing practice for materials and articles intended to come into contact with food.

4. Heavy metal thresholds for container made of glass declaration

Legal bases, enactments, regulations, and directives:

- European Packaging directive 94/62/EC, article 11 dated 20th of December 1994 on packaging and packaging waste, which is modified by 2001/171/EC, 2006/340/EC, 2004/12/EC and 2005/20/EC European directives.
- Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC.
- The heavy metal limits of Prop 65/California's Toxics in Packaging Prevention Act.
- The EPA 3052 method used for heavy metal analysis is confirmed to be in line with CONEG.

As Türkiye Şişe ve Cam Fabrikaları A.Ş., we declare that our products are compliant with the heavy metals (lead, cadmium, mercury, hexavalent chromium) limits required by the above regulations.

5. FDA

FDA acknowledged the use of glass for food contact as being GRAS in the February 8, 1983 issue of the Federal Register (see Vol. 48, No. 27, and page 5718). There is no direct citation for the use of glass as a

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food contact surface. However, glass containers, as all food containers, are subject to 21 CFR 110 and 21 CFR 174.5. TÜRKİYE ŞİŞE VE CAM FABRİKALARI A.Ş. complies with the appropriate sections of the former citation, which deals with food packaging material manufacturing.

6. Traceability

Legal bases, enactments, regulations, and directives:

- EC directive 1935/2004, article 17, dated 27th of October 2004.

As Türkiye Şişe ve Cam Fabrikaları A.Ş., we state that the products delivered by us are ensured by a traceability system to facilitate control, the recall of defective products, consumer information and the attribution of responsibility. Batch coding enables one-step forward and backward traceability. The organization verifies and tests the effectiveness of the traceability system.

7. Declaration concerning the raw material origin

As Türkiye Şişe ve Cam Fabrikaları A.Ş., we declare that the glass containers that we produce, for their own nature, are made with a fully inorganic material. Therefore, all the raw materials are neither organic nor of animal origin. We can state that we do not intentionally add the below-mentioned materials to our glass containers:

- | | |
|--|-----------------------------------|
| - TSE, BSE | - Alcohol |
| - Nitrosamine | - Ethanol, |
| - Latex, ITX, PBT, PVC, BPA BPB, Phthalates, | - Aflatoxins |
| - DEHP, DBP, DIDP, DINP, | - Polychlorinated biphenyl, |
| - Azodicarbonamide, | - Heavy metals (i.e. Hg, Cd, Pb), |
| - GMO, | - Asbestos, |
| - Allergens, | - Metal catalyst, |
| - Dioxin, | - Endocrine Disruptors |
| - Melamine, | - Solvent |
| - Halogenated organic chemicals, | - BPA, BPB, BPS, BPF |
| - Gluten, | - PFAS |
| - Mineral Oil (MOSH - MOAH) | - Polyparabens |

Any possible contact with the above-mentioned organics during the processing, handling and logistics operations of food containers is excluded. Glass is produced after melting raw materials at temperatures above 1400°C. Graphite based lubricants for molds are of mineral origin and they are completely burned off during containers forming and annealing due to the very high temperatures involved (between 500-1000°C).

Non-Intentionally Added Substances (NIAS):

Non-Intentionally Added Substances (NIAS) are substances that may arise unintentionally from reactions, breakdown, or contamination during manufacture.

Our glass containers are manufactured from soda-lime glass, an inert, inorganic material that melted at approximately 1400°C, where any organic residues are fully decomposed. Therefore, the glass itself does not release volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), or non-volatile organic compounds (NVOCs) under normal conditions of use.

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In line with Regulation (EC) No 1935/2004, this situation requires an appropriate assessment to confirm that no substances with a Specific Migration Limit (SML) migrate from the coating into the food contact side of the glass.

Untargeted analytical screening using Headspace GC–MS and solvent extraction GC–MS to identify potential VOC, SVOC, and NVOC substances are performed.

Based on the analytical results and considering the very limited incidental nature of any potential transfer, no migration exceeding applicable specific or overall migration limits is expected under foreseeable conditions of use.

No VOC, SVOC, and NVOC substances originating from the cold-end coating were determined. Based on the results of the analysis, we confirm that no compounds were detected, in line with Regulation (EC) No 1935/2004 and Regulation (EC) No 2023/2006 on Good Manufacturing Practice.

Phthalates

Phthalate esters (plasticizers) are not intentionally used in the formulation or manufacture of this glass packaging product.

According to our current information and supplier declarations, no intentional use of phthalates occurs within the production process or applied materials.

Bisphenols

BPA or any other bisphenol derivatives are not intentionally used in the formulation or manufacture of this glass packaging product as defined in Regulation (EU) 2024/3190.

8. Packaging waste declaration

Legal bases, enactments, regulations, and directives:

- European Packaging directive 94/62/EC, article 11 dated 20th of December 1994 on packaging and packaging waste, which is modified by 2001/171/EC, 2006/340/EC.
- Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC
- National Legislation of Turkey, the Control of Packaging Waste Directive
- As Türkiye Şişe ve Cam Fabrikaları A.Ş., we confirm that, based on the directives specified as requirements, conformity obligations and procedures mentioned are followed during the production of the glass packaging products.

9. Allergen

Allergens associated with eight major food groups including milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat and soybeans account for over 90% of the global food allergy concerns. Other potential allergens have also been identified in certain region or populations. Commonly understood “global” food allergens list provided herein is base No 1169/2011, Asia and Codex Alimentarius.

Glass packaging product is not intended for direct consumption as food. As Türkiye Şişe ve Cam Fabrikaları A.Ş., we manufacture glass containers from soda-lime-silica glass. We declare that our products are inert, and any allergenic materials are not intentionally used at any stage of our production process and none of allergenic material come into contact with our products.

Based on a review of the product composition, none of the substances are identified as or derived from:

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Bee and bee product	Not Present
Certain food and their derivatives: celery, tomato, yam, apple, orange, peach, kiwi, banana, mushroom, chicken, beef, pork	Not Present
Coconut and coconut derivatives	Not Present
Crustacean shellfish, molluscs, fish and fish products	Not Present
Egg and egg products	Not Present
Gelatine	Not Present
Milk and milk products	Not Present
Mustard, lupine, sesame and their derivatives	Not Present
Other gluten containing cereals,	Not Present
Peanuts and unrefined tree nuts derivatives	Not Present
Soy and unrefined tree nuts derivatives, soy derived highly refined substances	Not Present
sulphites > 10 ppm and sulfur dioxide	Not Present
Tree nuts and unrefined tree nuts derivatives	Not Present
Wheat, wheat varieties and their derivatives	Not Present

10. Halal Statement

As Türkiye Şişe ve Cam Fabrikaları A.Ş., We hereby declare that the glass containers that we produce, for their own nature, are made with a fully inorganic material.

We hereby would like to declare that packaging materials conform to the following requirements:

A. Materials used in its production are free from porcine or their derivatives or Alcohol derived from alcoholic beverages¹.

B. Industrial Alcohol, which is not derived from alcoholic beverages and if used in the production of packaging, is at residual ethanol level less than or equal to 0.1%.

C. The packaging is prepared, processed, or manufactured using equipment that is not used for materials with porcine or their derivatives.

D. Its preparation, processing, storage or transportation is ensured to be physically separated from any other item that does not meet the requirements stated in points A, B and C.

¹ Alcoholic beverage means:

- beverages containing ethanol and other compounds including methanol, acetaldehyde, and ethyl acetate which are made by fermentation with modification from various types of vegetable (as raw material) that contain carbohydrates; or
- beverages containing added ethanol and/or methanol intentionally.

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11. Radiation declaration

We hereby declare that our glass packaging products are not intentionally derived from, nor produced using, any raw materials that may generate radioactive residues, with respect to all products manufactured, processed, and packaged by our company.

There is no process step within our production operations that intentionally generates radioactive residues. Therefore, our products do not pose any radiological risk.

Best Regards,
On Behalf of

Türkiye Şişe ve Cam Fabrikaları A.Ş.

Levent Kazas
Certification and Product Performance Manager

Nurçin Özkaya
Quality Assurance Director

Türkiye Şişe ve Cam Fabrikaları A.Ş.

* This declaration is valid as of the date specified above, it will be replaced and updated in case of change of material composition, of substantial changes in the production that could bring about changes in the migrations, when new scientific data are available or when the relevant legislations are published, modified, and updated in such a manner as to require a new evaluation of the regulatory compliance. Otherwise, time of the validity of this declaration of compliance is 1 year.

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