



Product Regulatory Compliance Specification

January 3, 2022

The following information and certifications apply only to the specific recycled paperboard products listed below, manufactured in the United States and Canada, as sold by Graphic Packaging International, LLC (GPI), and do not apply to their subsequent use in any process or in combination with any other materials.

- **Pacesetter® Coated Recycled Paperboard**
- **Pacesetter® Uncoated Recycled Paperboard**
- **Pacesetter® Conceal Recycled Paperboard**
- **Conquest ® Recycled Paperboard**

The information and certifications provided herein are based on data obtained by GPI and from its suppliers which, to the best of our knowledge, we believe to be reliable. This guaranty shall apply to each shipment of such products as released to you from the paper mill, until you receive written notification of termination. Upon termination, this guaranty shall apply to shipments made prior to your receipt of such notice.

FDA Food Contact Status

GPI certifies that the products listed above conform to the requirements of the Federal Food and Drug Administration regulations covered in 21 CFR §176.260 (Pulp from reclaimed fiber), 21 CFR §176.170 (Components of paper and paperboard in contact with aqueous and fatty foods), subject to the extraction limitations therein, and 21 CFR §176.180 (Components of paper and paperboard in contact with dry food), for all non-alcoholic Food Types, except dairy products, identified in 21 CFR §176.170(c) Table 1, under Conditions of Use C through G specified in 21 CFR §176.170(c) Table 2. As supplied, the products listed above comply with any substantially similar state or local law. It is the responsibility of the Buyer or user to assure suitability for the intended food contact application, and the buyer and user will employ current GMP (cGMP) in the manufacturing, packing, labeling, and holding operations (including transportation and storage) of the food contact article. While GPI's paperboard product does not contain any substances that are known to pose a particular risk of imparting odor or taste to food, some foods are more susceptible than others to taste and odor transfer from food packaging materials. It is the Buyer's responsibility to consult GPI about any taste or odor concerns for sensitive foods that will contact our product. GPI will assist the buyer in determining the suitability of its product for use with a given type of food.

Product Regulatory Compliance Specification

January 3, 2022

Page 2 of 5

This guaranty applies only to the suitability of Seller's product under the applicable regulations of the United States Food and Drug Administration. It is the responsibility of the Buyer to ensure compliance with the food-contact laws and regulations of any other jurisdiction in which Seller's product might be used.

Use of Genetically Modified/Engineer Organisms (GMOs)

The products listed above utilize starch in the manufacturing process that may have been derived from genetically modified corn. Any genetically modified protein(s) would have been denatured in the starch manufacturing process.

Recycled Content

The products listed above are manufactured with 100 percent recycled fibers with a minimum of 35 percent post-consumer material.

Biodegradability/Compostability

The products listed above are manufactured from bio-based fiber (a material of natural origin) and mineral content. Given proper environmental conditions and time, the products will biodegrade. As there is not a specific test for paper compostability, it is recommended that ASTM 6400, 6868, or similar test methods are used to verify the compostable nature of paperboard or paperboard packaging.

California Safe Drinking Water & Toxic Enforcement Act of 1986 (Prop 65)

The products listed above comply with the requirements in the California State Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) and contain no substances that require declaration under the provisions of this regulation.

US Model Toxic in Packaging Legislation for Packaging Material (CONEG)

Graphic Packaging International, Inc. does not intentionally introduce lead, mercury, cadmium or hexavalent chromium, in the manufacture of the products listed above, and the concentration of each of these metals should not exceed five parts per million. Accordingly, Graphic Packaging International, Inc. certifies that the sum of the amounts of lead, cadmium, mercury and hexavalent chromium in the products listed above does not exceed 100 parts per million (ppm).

Toy Safety Standards

The products listed above comply with the requirements established in the current versions of the ASTM F 963 and European EN 71-3 European Toy Safety standards limiting the content of heavy metals and organic chemicals.

Mineral Oil

Lacking an established regulatory limit for mineral oils in paper and paperboard packaging materials, GPI believes it is premature to report on potential mineral oil

Product Regulatory Compliance Specification

January 3, 2022

Page 3 of 5

concentrations. This issue is further complicated by the lack of an established, standardized analytical method for determining mineral oil content and migration potential. GPI continues to monitor proposed regulatory changes relating to mineral oils, and will act in a timely fashion as warranted by future regulatory activities.

REACH

The products listed above are "Articles" that contain no chemical substance intended to be released under normal or reasonably foreseeable conditions of use, and as such are exempt from registration under Article 7 of Regulation (EC) 1907/2006 of The European Parliament (REACH). Moreover, no substances which are listed in ANNEX XVII and ANNEX XIV List of Substances Subject to Authorization or on the current Candidate List of Substances of Very High Concern (SVHC) as defined in Article 57 of Regulation (EC) 1907/2006, or substances which are Dangerous, Carcinogenic, Mutagenic or Toxic to Reproduction (CMR), or Persistent, Bio accumulative and Toxic (PBT) or very Persistent and very Bio accumulative (vPvB) according to the criteria in Annex XIII of the REACH Regulation, or hazardous substances meeting the criteria for classification in category 1 or 2 in accordance with Directive (EC) 67/548 are intentionally used in the manufacture of these products or are present as impurities in the products in concentrations greater than 0.1 percent by weight.

Allergens

The products listed above are not manufactured with and do not contain materials derived from milk, eggs, wheat, peanuts, tree nuts, fish, shellfish, gluten, mustard, sesame, soy, sulfites, natural rubber or natural latex. The products listed above may contain synthetic latex materials which are not associated with allergic reactions.

Lacey Act

The Lacey Act of 1900 was most recently amended in 2008 to broaden the range of plants and plant products protected from use, as well as requiring an import declaration for certain plants and plant products. An exclusion exists for plants and plant products used exclusively as packaging material, provided the packaging material itself is not the item imported. Since the products listed above are produced domestically, and are intended for use as packaging, the declaration requirements of the Lacey Act do not apply.

Ozone-Depleting Chemicals (ODC)

To the best of our knowledge, the products listed above are not manufactured with ODC, as defined in 40 CFR 82.104, nor do they contain any of the listed Class I or Class II Ozone-Depleting Chemicals as identified in EPA's final rule 40 C.F.R. Part 82. Upon this determination, no labeling pursuant to 40 C.F.R. 82.106 is required for the products listed above.

Benzophenone (BP), 4-methylbenzophenone (4-MBP) & 2 Isopropylthioxanthone (2-ITX)

The products listed above are not manufactured with or intentionally contain benzophenone, 4-methylbenzophenone or 2-ITX. However, benzophenone and 2-ITX

Product Regulatory Compliance Specification

January 3, 2022

Page 4 of 5

may be present in certain recycled fiber raw materials and, therefore, may be detectable in the above listed products in concentrations up to 4 ppm.

EU Directive 2015/863/EU Restriction on Hazardous Substances (RoHS 3)

Analytical testing has detected substantially less than 100 ppm of the metals lead, mercury, cadmium, lead, and hexavalent chromium in GPI products, which therefore are in compliance with EU Directive 2015/863/EU Restriction on Hazardous Substances (RoHS 3). Additionally, GPI does not intentionally add polybrominated biphenyl (PBB), polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP) or diisobutyl phthalate (DIBP) to its products or purchase raw materials that are known to contain these substances which were added in EU Directive 2015/863.

Conflict Minerals Provision of the Dodd Frank Act

The products listed above are not manufactured with and do not contain materials derived from conflict minerals. The conflict minerals include columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives from the Democratic Republic of Congo and its adjoining countries – Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia. Conflict minerals are so termed because the proceeds from their sale in these countries have been used to fund armed militias. These minerals are commonly used to make components for electronic products (e.g., cell phones, computers, televisions, PDAs, DVD players and video game systems), medical equipment, high-speed tools, machine parts, glass and lamps. Conflict minerals are generally used in the manufacture of electronic devices.

Recycled Paperboard Association (RPTA)

The products listed above meet or exceed all requirements of the RPTA Food Packaging Safety Protocol. This is an industry and worldwide recognized document that undergoes updates frequently to assure customers that recycled board is appropriate for food-contact packaging. GPI is a member in good standing with RPTA.

European Directive on Packaging Waste (Directive 94/62/EC)

The products listed above are fully recyclable, have a positive energy recovery in combustion, and do not exceed a total concentration of 100 parts per million by weight of the heavy metals cadmium, lead, mercury, and hexavalent chromium.

Compliance with Other Standards and Regulations

GPI does not intentionally use any of the following substances in the manufacture of the products listed above and, to the best of our knowledge, such substances are not expected to be present except as possible trace contaminants:

- **Carcinogens:** Substances listed by IARC, NTP or OSHA as known or possible carcinogens;

Product Regulatory Compliance Specification

January 3, 2022

Page 5 of 5

- **Endocrine Disruptors:** Alkyl or aryl phthalates or bisphenol A or other substances listed by EPA under the Endocrine Disruptor Screening Program;
- **Polychlorinated Compounds:** Polychlorinated biphenyls (PCB), polychlorinated dibenzo-p-dioxins (PCDD) and polychlorinated dibenzofurans (PCDF);
- **Dioxins:** 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) at a level in excess of 2 ng/kg;
- **Brominated Substances:** Polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE);
- **Per- and Polyfluoroalkyl Substances (PFAS):** Per- and Polyfluoroalkyl Substances (PFAS) including Perfluorooctanoic acid (PFOA) and perfluorooctyl sulfonates (PFOS);
- **PAH:** Polycyclic aromatic hydrocarbons;
- **Nanomaterials or nanoparticles:** Nanoscale components comprised of particles with a length scale of approximately one to one hundred nanometers in any dimension;
- **Biotoxins:** such as ciguatoxin, tetrodotoxin, shellfish toxin, aflatoxin, botulinum toxin or other known biotoxins;
- **Substances of Animal Origin** (with the possible exception of metal salts of stearic acid);
- **Canada Chemicals Management Plan:** Priority List or Challenge substances listed under the Canadian Environmental Protection Act (CEPA); and
- **PVC:** Polyvinyl chloride (PVC).

Graphic Packaging International, LLC

Health, Safety and Environmental Department

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