



EU DECLARATION OF CONFORMITY — PACKAGING

Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) Article 39 & Annex VIII

To be completed by: SW Production S.A DE C.V DbA Spotsee

WHAT IS THIS DOCUMENT AND WHY DO YOU NEED TO COMPLETE IT?

The European Union has introduced new mandatory packaging legislation: Regulation (EU) 2025/40, known as the Packaging and Packaging Waste Regulation (PPWR). It applies to all packaging used on the EU market, regardless of where it was manufactured.

As the EU importer of your products, we are legally required to hold a signed Declaration of Conformity (DoC) for each packaging type before placing products on the EU market. Without this document, we cannot legally import and sell your products in the EU from August 12, 2026.

IMPORTANT: This declaration is about your PACKAGING ONLY (the box, foam inserts, bags, labels), NOT about the product itself. It is separate from CE marking, RoHS, or any product compliance you may already provide.

Please complete one copy of this form per packaging type, sign it, and return it

SECTION A — Your Company Details (Manufacturer)

HOW TO COMPLETE THIS SECTION

Complete your full legal company name and address. If your company has an EU-based representative or agent, please also include their details.

Company name	SW Production S.A. DE C.V
Country	Mexico
Street address	Km 5 carretera a delicias int bodega 7 & 8
Contact person	Adrian Gonzalez – Quality System
Email address	apgonzalez@spotsee.io
Phone number	[Optional]
EU Representative	[Name and address of EU-based agent, if any — otherwise write 'None']

SECTION B — Packaging Description

HOW TO COMPLETE THIS SECTION

Complete one copy of this form for each packaging TYPE. A packaging type means one specific combination of material and format — for example, a brown cardboard outer box is one type; the foam insert inside is a second type; a plastic bag is a third type. If you use the same box for multiple products, you only need one declaration for that box type.

Packaging name / description	Transport indicators for packaging, Temperature indicators.
Your internal article number	CT0C-D 0C Descending Coldsnap CT10C-D 10C Descending Coldsnap CT-10C-D 10C Descending Coldsnap CT15C-D 15C Descending Coldsnap CT-20C-D -20C Descending Coldsnap CT2C-D 2C Descending Coldsnap CT45C-A 45C Ascending Coldsnap CT5C-D 5C Descending Coldsnap CT-5C-D - 5C Descending Coldsnap
Packaging level Choose one	Transport
Main material	Cardboard_Paper adhesive labels, PVC pressure-sensitive label, Polycarbonate,

	Bimetal disc, ink
Other materials present	Water-based ink printing
Weight of empty packaging (grams)	4 g
Dimensions L × W × H (mm)	L 54.96 mm × W 17.74 mm × H 5.91 mm
Products this packaging is used for	Supply chain monitoring

SECTION C — Substance Compliance

HOW TO COMPLETE THIS SECTION

This section asks you to confirm that the packaging materials do not contain certain chemicals that are banned or restricted under EU law. Please check the box that applies and provide evidence where requested. If you are unsure, ask your packaging material supplier for a written confirmation.

Requirement	Compliant	Not Compliant / N/A
PFAS-free (no intentionally added per- and polyfluoroalkyl substances) <i>Required for ALL food-contact packaging. Also strongly recommended for all other packaging types.</i>	☒ YES	☐ NO / N/A
Heavy metals within EU limits <i>Total of lead (Pb) + cadmium (Cd) + mercury (Hg) + hexavalent chromium (Cr VI) ≤ 100 mg/kg (ppm)</i>	☒ YES	☐ NO / N/A
No other banned substances <i>No substances listed on the REACH Candidate List above 0.1% by weight, unless documented in product-specific information</i>	☒ YES	☐ NO / N/A

Evidence / test reports available for substance claims:

Type of evidence	Reference / date
Supplier declaration for packaging material	FMD
Third-party test report (if available)	<i>[reference, lab name, date — or 'not available']</i>
Other (describe):	<i>[description]</i>

SECTION D — Packaging Design

HOW TO COMPLETE THIS SECTION

These questions check that the packaging is not unnecessarily large or wasteful. Answer honestly — if any box is 'NO', please add a brief explanation in the notes field.

Requirement	Compliant	Not Compliant / N/A
The packaging is no larger than needed to protect the product	☒ YES	☐ NO / N/A

<i>There should be no unnecessary empty space inside the box beyond what is needed for protection and cushioning.</i>		
No false bottoms, double walls, or deceptive design <i>The packaging should not create a false impression about the quantity or size of the product.</i>	☒ YES	☐ NO / N/A
Packaging weight has been minimized <i>Wall thickness, number of layers, and total material use should be the minimum necessary for safe product delivery.</i>	☒ YES	☐ NO / N/A
The packaging is designed to be recyclable <i>Materials should be separable (e.g. cardboard separate from plastic inserts) and compatible with standard recycling streams.</i>	☒ YES	☐ NO / N/A

Notes / explanations (if any answer above is NO):

SECTION F — Commitment and Notification

HOW TO COMPLETE THIS SECTION

By signing this declaration, you confirm the above and agree to notify, if anything changes.

I / we hereby commit to the following:

- If the packaging material, design, supplier, or manufacturing process changes in any way that could affect this declaration, I / we will notify without delay and provide an updated Declaration of Conformity before the next shipment.
- I / we will keep the technical documentation supporting this declaration (including supplier declarations, test reports, and material specifications) on file for a minimum of 10 years.
- I / we accept that this declaration will be relied upon by in fulfilling their legal obligations as EU importer under EU Regulation 2025/40.

SECTION G — Signature

Full name	Adrian Gonzalez
Job title	Quality System
Company	SW Production Dba Spotsee
Place and date	8/19/2026
Signature	

Retention: Manufacturer retains this declaration and supporting documentation for minimum 10 years.

Legal basis: Regulation (EU) 2025/40 (PPWR), Article 39 and Annex VIII. Mandatory from August 12, 2026.