



## 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, Shock watch and tilt indicators.                                                                                                                                                                                              |
| Your internal article number  | Shock Watch 2 - 5G 45000K<br>Shock Watch 2 - 10G 46000K<br>Shock Watch 2 - 15G 47000K<br>Shock Watch 2 - 25G 48000K<br>Shock Watch 2 - 37G 49000K<br>Shock Watch 2 - 50G 50000K<br>Shock Watch 2 - 75G 51000K<br>24114<br>24101 (and all customized part numbers) |
| Packaging level<br>Choose one | Transport                                                                                                                                                                                                                                                         |

|                                            |                                                                                                                   |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| <b>Main material</b>                       | Cardboard_Paper adhesive labels<br>Cardboard_Paper pressure-sensitive label<br>Plastic_Polystyrene_PS paper label |
| <b>Other materials present</b>             | Water-based ink printing                                                                                          |
| <b>Weight of empty packaging (grams)</b>   | Shockwatch 2 <b>4.6580 grams</b><br>TiltWatch XTR <b>11.8734 grams</b><br>Tilt Watch PLUS <b>11.5024 grams</b>    |
| <b>Dimensions L × W × H (mm)</b>           | Tilt Watch 60.20 x 74.30 x 3.50<br>Shockwatch 43 x 43 x 3.50<br>TW Plus 137 x 118.50 3.5                          |
| <b>Products this packaging is used for</b> | 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               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|-----------------------------------|
| <b>PFAS-free (no intentionally added per- and polyfluoroalkyl substances)</b><br><i>Required for ALL food-contact packaging. Also strongly recommended for all other packaging types.</i> | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO / N/A |
| <b>Heavy metals within EU limits</b><br><i>Total of lead (Pb) + cadmium (Cd) + mercury (Hg) + hexavalent chromium (Cr VI) ≤ 100 mg/kg (ppm)</i>                                           | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO / N/A |
| <b>No other banned substances</b><br><i>No substances listed on the REACH Candidate List above 0.1% by weight, unless documented in product-specific information</i>                      | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> 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)      | [reference, lab name, date — or 'not available'] |
| Other (describe):                           | [description]                                    |

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

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

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## SECTION F — Commitment and Notification

### **i** 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      | <i>Adrian Gonzalez</i>    |

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.