Victor Stationery OÜ
Peterburi tee 92F
13816 Tallinn
Estonia

PPWR PACKAGING COMPLIANCE STATEMENT

Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

This document records Victor Stationery OÜ's assessment and management of packaging used in the manufacture, packing, storage and transportation of its stationery products with regard to the applicable requirements of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR).

Victor Stationery OÜ is not the manufacturer of the packaging materials listed in this document. The packaging materials are purchased from external packaging suppliers and used by Victor Stationery OÜ in its production, packing and transport.

Packaging covered by this Statement

- Wooden EUR pallets
- Wooden FIN pallets
- Wooden pallet covers
- LLDPE plastic pallet wrapping material
- LDPE shrink wrap
- PO shrink wrap
- Cardboard sheets
- Cardboard protective corners
- Corrugated cardboard cartons
- Paper labels
- Paper/PE bands
- BOPP packaging tape
- PE-coated corrugated board
- Cellobag
- Polybags

Individual packaging materials used for specific products and customer orders are traceable through Victor Stationery OÜ's purchasing, production and invoice records.

Company using the packaging

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Manufacturer and supplier responsibility

Victor Stationery OÜ manufactures stationery products and uses packaging materials purchased from external packaging suppliers for the packaging, protection, handling, storage and transportation of its finished products.

Victor Stationery OÜ is not the manufacturer of the packaging materials purchased from external suppliers. The relevant packaging suppliers remain responsible for the conformity of the packaging materials they manufacture and supply, as applicable under Regulation (EU) 2025/40.

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Victor Stationery OÜ assesses the packaging materials that it purchases and uses within its own activities and maintains relevant supplier specifications, declarations and other supporting information necessary for the applicable PPWR assessment.

Where Victor Stationery OÜ places packaged notebooks on the Union market, its responsibilities under Regulation (EU) 2025/40 are determined according to the applicable role and requirements for the relevant packaging and supply-chain situation.

This document is a packaging compliance information document for the packaging materials used by Victor Stationery OÜ. It does not constitute an EU Declaration of Conformity issued by Victor Stationery OÜ on behalf of an external manufacturer of packaging materials.

Applicable Union legislation

The packaging covered by this document is considered with regard to the applicable requirements of 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.
Victor Stationery OÜ applies the requirements relevant to the packaging within its activities, considering the applicable dates of application, transitional provisions and any applicable delegated or implementing measures.

Assessment and supporting technical documentation

The packaging covered by this Statement is identified in the supporting **Victor Stationery PPWR Packaging Technical Documentation in Annex 1**

Supplier documentation

Victor Stationery OÜ requests and retains relevant supplier documentation where necessary to demonstrate the characteristics and compliance status of purchased packaging. Supplier information may include material composition, recycled content, substance information, recyclability information, packaging weight and other data required for the applicable PPWR assessment.
Where supplier documentation is incomplete or requirements change, Victor Stationery OÜ will review the relevant packaging and request updated information from the supplier where appropriate.

Standards and technical specifications

Where applicable, relevant harmonised standards, common specifications and other technical specifications used for the assessment of packaging are identified in the supporting technical documentation. In the absence of an applicable harmonised standard or common specification, the assessment is based on the applicable requirements of Regulation (EU) 2025/40 and the available technical and supplier documentation.

Third-party or customer-supplied packaging

Where packaging is supplied by a customer or another third party and incorporated into a product, the conformity responsibility for that packaging remains with the relevant manufacturer or responsible economic operator, unless Victor Stationery OÜ assumes such responsibility under the applicable legal framework. Packaging applied after the product leaves Victor Stationery OÜ's control is outside the scope of this document unless specifically identified in the supporting documentation.

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ANNEX 1 : PPWR Packaging Technical Documentation

The Technical Documentation below is organized by packaging categories and packaging types and covers the packaging materials used by Victor Stationery OÜ for the packaging, protection, handling, storage and transportation of its finished products. As this is a universal document covering the range of packaging materials that may be used in our production, the specific packaging materials used for each order will be identified through the packaging materials category shown on our invoices.

DESCRIPTION AND CLASSIFICATION OF PACKAGING UNIT

	Wooden pallet, EUR
Description of intended use	Transit packaging. Transportation of packaged goods
Material composition	Approx. 98% wood, 2% metal
Recycled content	0%
Type 1	EUR pallet
Format, mm	1200 x 800
Weight, kg	22

	Wooden pallet, FIN
Description of intended use	Transit packaging. Transportation of packaged goods
Material composition	Approx. 98% wood Approx. 2% metal
Recycled content	0%
Type 2	FIN pallet
Format, mm	1200 x 1000
Weight, kg	20
	Wooden pallet cover, EUR
Description of intended use	Transit packaging. Transportation of packaged goods
Material composition	Approx. 99% wood Approx. 1% metal
Recycled content	0%
Type 1	EUR pallet lid
Format, mm	1200 x 800
Weight, kg	7
	Wooden pallet cover, FIN
Description of intended use	Transit packaging. Transportation of packaged goods
Material composition	Approx. 99% wood

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	Approx. 1% metal
Recycled content	0%
Type 2	FIN pallet lid
Format, mm	1200 x 1000
Weight, kg	8

	Plastic pallet packaging material
Description of intended use	Transit packaging. Wrapping and securing product on the pallet
Material composition	100% plastic
Type 1	LLDPE
Recycled content	0%
Format	500mm x 17µm/2100m
Weight per pallet, kg	0.7

	Shrinkwrap for product packs Type1
Description of intended use	Transit packaging.
Material composition	100% plastic
Type 1	LDPE 100%
Recycled content	0%
Format, mm	37 µm
Weight per pack, kg	0,0063, may vary

	Shrinkwrap for product packs Type2
Description of intended use	Transit packaging.
Material composition	100% plastic
Type 2	PO 100%
Recycled content	0%
Format, mm	15µm, size may vary
Weight per pack, kg	0,0035, may vary

	Cardboard sheet
Description of intended use	Transit packaging. Securing product on the pallet
Material composition	Board
Recycled content	100%
Format, mm	600 x 897
Weight per pallet, kg	2.5

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	Cardboard corners, type 1
Description of intended use	Transit packaging. Securing product on the pallet
Material composition	100% cardboard
Type 1	Protective cardboard corners
Recycled content	35%
Format, mm	60 x 60 x x 3
Weight per pallet, kg	0.26

	Cardboard corners, type 2
Description of intended use	Transit packaging. Securing product on the pallet
Material composition	100% cardboard
Type 2	Protective cardboard corners
Recycled content	35%
Format, mm	50 x 50 x 3
Weight per pallet, kg	0.113

	Cartons
Description of intended use	Transit packaging. Securing product on the pallet
Material composition	100% cardboard
Type 1	Corrugated Cardboard Box >5 % Plastic, Adhesive (PVA/PVAc)
Recycled content	35%
Format, mm	various
Weight per carton, kg	0,3, may vary
Type 2	**Labels, for pack and carton**
Material composition	paper 85%, glue 15%
Recycled content	0%
Format, mm	various
Weight per sticker, kg	~0,0008, may vary

	Band
Description of intended use	Transport, not for sale
Material composition	Paper 75%, PE 25%
Recycled content	35%
Format, mm	30mm x 800m
Weight per book, kg	0.00165, may vary

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Type 1	**Plastic BOPP tape**
Recycled content	0%
Format, mm	48 x 25µm/990m, 66m
Weight per box, kg	~0,005

	Corrugated Board PE
Description of intended use	Transit packaging. Securing product on the pallet
Material composition	Corrugated Board with 12% polyethylene coating
Recycled content	To be confirmed
Format, mm	diameter 1200
Weight per pallet, kg	1

	Cellobag
Description of intended use	Sales packaging
Material composition	100% CPP (Cast Polypropylene)
Recycled content	0%
Format, mm	various
Weight	various

	Polybags
Description of intended use	Sales packaging
Material composition	100% virgin LDPE
Recycled content	0%
Format, mm	160 x 830 x 0,035mm
Weight	various

As the PPWR continues to be supplemented by implementing acts, delegated acts, harmonised standards and additional guidance, Victor Stationery OÜ will review and update its documentation where necessary.

Date of issue: 14.08.2026

Name: Raivo Mägi

Function: Managing Director

Signature: