

Declaration of Compliance

Date: March 18, 2026

To whom it may concern,

The following statement provides information on the requested regulations.

EU Packaging and Packaging Waste Regulation (PPWR)

Our products and raw materials, comply (or will comply) with the EU PPWR requirements applicable from 12 August 2026 onward. Please see attached presentation for additional information.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Joe Meckler

Joe Meckler
Director of Technology
Gardian Holdings, LLC
5700 Tennyson Parkway
Ste. 275 Plano, TX 75024
jmeckler@gardian.com

Appendix

Gardian's Ty-Gard and Ty-Patch products are also compliant with the following standards and regulations:

Canadian Environmental Protection Act, 1999 (CEPA) Schedule I Toxic Substances

Based on the information provided by our suppliers and the formulations of our products and raw materials, the product(s) listed above are in compliance with CEPA, 1999 (CEPA 1999). The product(s) listed above are compliant with the Batches 1 – 12 chemical substance list of the chemical compounds restricted in the CEPA “Challenge”, under the Canadian Chemicals Management Plan of the Canadian Environmental Protection Act.

However, raw material Antimony Trioxide (CAS 1309-64-4) is used as a polymerization catalyst in the production of the base PET resin, present in the film / liner / backing of the product(s) listed above. The raw material supplier has conducted extraction and migration testing, which resulted in failure to detect Antimony (Sb) residual, and the material is not a risk. (CEPA does not include threshold levels).

Japan Chemical Substances Control Law (CSCL) Class I and Class II Specified Chemical Substances

Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the product(s) do not contain any intentionally added PFAS or PFAS-related substances, as of the date of this letter

EU End-of-Life (ELV) Legislation

Please refer to compliance statement for EU RoHS Directive 2011/65/EU and Amendment 2015/863/EU as the same chemical and hazardous substances are regulated under the ELV.

EU Persistent Organic Pollutants (POPs)

Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, Persistent Organic Pollutants (POPs) as listed in the Stockholm Convention are not intentionally added as ingredients in the manufacture of the raw materials used or the final product(s) listed above, as of the date of this letter. It is not expected that any of these chemicals are present in the above listed product(s). The potential presence of these chemicals at trace levels as impurities or by-products of the manufacturing process cannot be excluded.

EU REACH Annex XIV

Substances listed in Annex XIV, also known as the “Authorization List”, cannot be used in the EU without prior authorization. Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the product(s) listed above does not contain any intentionally added substances listed on Annex XIV of REACH, as of the date of this letter.

EU REACH Annex XVII

Substances listed in Annex XVII, also known as the “Restricted Substances List”, are limited or banned from manufacture, placing on the market (including imports), or use in the EU. Annex XVII can also impose conditions such as requiring technical measures or specific labels on restricted substances. Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the product(s) listed above does not contain any intentionally added substances that are within the scope of the listings in Annex XVII of REACH, as of the date of this letter.

EU REACH Candidate List of Substances of Very High Concern (SVHC)

Substances listed in The Candidate List of Substances of Very High Concern (SVHC) may pose serious risks to health or the environment due to hazardous properties. These substances are subject to further evaluation and potential regulation under the Authorization List (Annex XIV) of REACH. Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the product(s) listed above does not contain any intentionally added substances that are within the scope of the listings on the Candidate List of Substances of SVHC of REACH, as of the date of this letter.

EU RoHS Directive 2011/65/EU and Amendment 2015/863/EU

Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the product(s) listed above does not contain any of the components listed in the RoHS Directive and its Amendments above the maximum levels allowed, as of the date of this letter. They are not intentionally added as ingredients in the manufacture of the raw materials used or the final product(s) listed above, therefore it is not expected that any of these chemicals are present in the above listed product. The potential presence of these chemicals at trace levels as impurities or by-products of the manufacturing process cannot be excluded.

EU Waste Framework Directive (WFD) and SCIP Database

The EU Waste Framework Directive (WFD) and SCIP Database is a European Union law that requires companies supplying articles containing SVHC's at a concentration greater than or equal to 0.1%, as defined by ECHA, to be identified and reported.

Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the product(s) listed above does not contain any substances that are within the scope of the listings on the Candidate List of Substances of SVHC of REACH, as of the date of this letter.

Hazard Classes per Article 2(27)b and Heavy Metals per Article 5(4)

Hazard Classes are only applicable to liquid chemistry products, not articles. Therefore, since Gardian produces only articles and not liquid chemistry products this is not applicable to products produced by Gardian.

The heavy metal substances listed per Article 5(4) of the Packaging and Packing Waste Regulation (EU) 2025/40 are the same heavy metals listed in the EU RoHS regulations, so I have included that regulation above to address your query.

Minimata Convention on Mercury

Please refer to compliance statement for EU RoHS Directive 2011/65/EU and Amendment 2015/863/EU as the same chemical and hazardous substances are regulated under the Minimata Convention on Mercury.

Montreal Protocol on Substances that Deplete the Ozone Layer (Montreal Protocol)

The Montreal Protocol regulates the production and consumption of ozone-depleting substances (ODS). Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the product(s) listed above does not contain any substances that are within the scope of the listings on the Montreal Protocol, as of the date of this letter.

Persistent, Bioaccumulative, and Toxic (PBT) Substances under TSCA Section 6(h)

Gardian Holdings does not intentionally add the restricted substances as ingredients in the raw materials used or final product listed above. Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the above-mentioned products do not contain any intentionally added restricted substances listed under TSCA Section 6(h), as of the date of this letter.

Per- and Polyfluoroalkyl Substances (PFAS)

Based on the information provided by our suppliers and the formulations of our products and raw materials, to the best of our knowledge, the above-mentioned products do not contain any intentionally added PFAS or PFAS-related substances, as of the date of this letter.

Gardian Holdings does not conduct testing for the presence of these chemicals.

Regulation (EU) 517/2024 on Fluorinated Greenhouse Gases

Regulation (EU) 517/2024 limits the placing on the market of hydrofluorocarbons (HFCs), perfluorocarbons, sulfur hexafluoride and other greenhouse gases that contain fluorine, as well as imposing conditions on their use. These substances are a subgroup of per- and polyfluorinated substances (PFAS) with a high potential to accelerate global warming. They are most commonly used in refrigeration equipment, air-conditioning equipment, and fire protection systems.

Gardian Holdings does not place these substances on the market directly, and due to the nature of its products, they contain only minimal traces of gaseous substances. Additionally, gases are not intentionally added with the purpose of being released from the products. Because of that Gardian products are not within the scope of the requirements of this regulation.



Toxic Substance Control Act (TSCA) Chemical Substance Inventory

The products produced by Gardian Holdings are not regulated under the Toxic Substance Control Act (TSCA) as the regulation targets chemicals. All products produced by Gardian are considered articles. Articles are not regulated by the TSCA.

United States Specified States: Toxics in Packaging Regulation (U.S. TIP)

Please refer to compliance statement for EU RoHS Directive 2011/65/EU and Amendment 2015/863/EU as the same chemical and hazardous substances are regulated under the U.S. TIP.