SCOPE

The framework of activity of the Vidrala Group is the manufacture of hollow glass for the food industry using the press-blow process and/or blow-blow process in several varieties of white, green, dark, dead leaf, moss, topaz, amber, blue and/or black glass, according to the Plant and scheduling of planned production at any given time.

This declaration of conformity applies to the Vidrala Group's central services office and to its production plants:

- Aiala Vidrio, S.A.
- Crisnova Vidrio, S.A.
- Castellar Vidrio, S.A.
- Gallo Vidro, S.A.
- Santos Barosa Vidros, S.A.

ACTIVITY

The glass bottles for the food and beverage use manufactured in the Vidrala Group's production plants are sodium-calcium type, in accordance with the Classification of Economic Activities currently in effect in Spain (CNAE-2009), with the code number 2313.

DUE DILIGENCE AND LEGAL COMPLIANCE

Vidrala takes all reasonable measures and precautions and exercises the due diligence to eliminate, or this is not possible minimise, the risk of accidental or intentional contamination of our products, by ourselves or by any other person or entity under our control.

We therefore implement the necessary measures to:

- Meet our customers' requirements, needs and expectations.
- Implement effectively the requirements set out in the reference standards ISO 9001, ISO 14001, ISO 45001 and BRCGS for Packaging Materials, in which all our production plants are certified.
- Comply with the current applicable law with regard to materials intended to come into contact with food and beverage products.

This reference law is set out in the following legal framework:

1. **General provisions on *materials and articles intended to come into contact with food:***

   - **Regulation (EC) No 1935/2004** of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food (and repealing Directives 80/590/EEC and 89/109/EEC).

   - **Commission Regulation (EC) 2023/2006** of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.

2. **Legal provisions on *specific materials* in contact with food:**

   Commission Regulation (EC) 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food, consolidated with all its subsequent amendments up to the date of issuance of this declaration of conformity.

   Vidrala ensures that all the materials used in the glass manufacture process that contain monomers/polymers covered in this regulation comply with the global migration limits laid down in it. For this purpose, global migration tests have been conducted in an accredited laboratory using the following simulants and conditions, with the method set out in the DIN-EN-1186 standard.

Simulant	Limits	Tolerance	Temperature (test)	Time (test)
B: Acetic acid 3%	Of quantification (test) 1.0 mg/dm^2	$\pm$ 2 mg/ dm^2	40ºC	10 days
A: Ethanol 10%				
Ethanol 95%		$\pm$ 3 mg/ dm^2		
I-octane	Legal 10 mg/dm^2		20ºC	2 days

3. **Legal provisions on *heavy metals/containers and container waste:***

   - **European Parliament and Council Directive 94/62/EC** of 20 December on packaging and packaging waste.
   - **Decision 2001/101/EC** of 19 February, establishing the conditions for the non-use of glass containers in the concentration of heavy metals established in Directive 94/62/EC on packaging and packaging waste.

Directive 94/62/EC sets a series of upper limits for the sum total of concentration in the weight of lead, cadmium, mercury and hexavalent chrome of 100 ppm.

The special characteristics of glass bottles for food use means that the inclusion of these heavy metals is only possible by the external glass, from recycling. The chemical stability of the vitrous network makes it impossible for these heavy metals to be transferred to either the content or nature. It is this fact that is the basis of the exception for glass in Decision 2001/171/EC of 200 ppm, provided that:

1. Lead, cadmium, mercury, and hexavalent chromium are not intentionally introduced during the manufacturing process.
2. The heavy metal concentration limits are due solely to the addition of recycled materials.
3. If the average concentration levels of heavy metals exceed 200 ppm for twelve consecutive months, a report is submitted to the competent authorities of the Member States.

Vidrala, in all its production plants, periodically performs controls of representative samples, whose results allow us to guarantee compliance with the applicable law.

INTENDED USE AND NON-INTENDED USE

Our containers are glass bottles or jars intended to contain food and, therefore, come into direct contact with food and are highly sensitive in terms of hygiene risk.

The following family groups are currently in use:

- Wines
- Cavas, sparkling wines and ciders
- Waters, beers and soft drinks, juices
- Spirits and aperitifs
- Preserves
- Oils and vinegars
- Dairy products, multi-products and others.

They are not catalogued in the different groups of families and therefore the "Baby food" category can be considered the only unintended use, as no analysis of the specific needs of this type of product has been carried out.

Any use that is other than as a container of a food product shall be an unintended use. Vidrala disclaims all responsibility in any event for any misuse or unforeseen use of the product once it has been dispatched from its facilities, such as the use of the container for a purpose other than containing food, improper opening, malicious use or fraudulent packaging.

PRODUCT COMPOSITION AND MATERIALS USED

Our bottles and jars, based on the law described above, are designed in terms of their composition on the basis of the following values:

SiO_2	69%	÷	74%
$Na_2O+ K_2O$	11%	÷	16%
CaO + MgO	10%	÷	14%
$Al_2O_3 + Fe_2O_3$	0,5%	÷	4,0%

The said composition is obtained from the mixture of the various raw materials and recycled glass cullet. This glass cullet accounts for between 8% and 80% of the total composition. This figure depends on the furnace, the heat and the availability of recycled cullet.

OTHER MATERIALS

Vidrala ensures that no products containing genetically modified organisms, allergens or nano-materials are used in the manufacturing process of its product, in accordance with the formula and materials used in the process.

It is possible that Vidrala may subject its products to a painting/matt coating process. In these cases, Vidrala must ensure that this task is carried out in at least the same conditions as the handling of the product within our facilities.

FUNCTIONAL BARRIER

The glass composition does not involve any element that could be toxic or hazardous, and its production results in the forming of a vitreous network with a very stable structure, high inertness and chemical inalterability, which mean that leaching, management , migration and incineration tests show that transfers are practically non-existent, and do not constitute any kind of risk to health or the environment. Glass is therefore considered to be an inert material.

In addition, glass has no taste and is odourless and does not alter the organoleptic characteristics of food and beverages.

According to Regulation (EC) 10/2011, a "functional barrier" is one constituted by one or more layers of any type of material that guarantees the absence of migration above 0.01 mg/kg,

RESPONSIBILITIES

This declaration of conformity is based on information believed to be correct and up-to-date. t covers the composition and characteristics of our packaging, but does not imply suitability for technical use under any circumstances: correct storage, conservation and handling conditions of the product must be maintained before final packaging.

This statement may be invalidated if the material is not properly processed or if it is by any means, accidental or intentional, altered or used for an unforeseen and/or fraudulent use.

In the event of changes in the packaged product, its composition or destination, the recipient of this declaration must ensure, under its responsibility, that its product or service is compatible with our glass containers. In any case, it is the final packer who is ultimately responsible for ensuring that the final container complies with the restrictions applicable to the actual conditions of use.

The latest version of this declaration of conformity supersedes and renders all previous ones null and void. It must be renewed whenever there are substantial changes in production, product or process with potential repercussions on the customer and/or end consumer in terms of safety and product quality or, at least, once per calendar year from its date of approval. It will be available on our website for anyone who is interested.

This declaration of conformity is issued for the record and for the pertinent purposes to whom it may concern.

In Llodio, on 10 de February de 2021

Signed: Gorka Echebarria

Quality, Occupational Risk Prevention and Environment Manager

VIDRALA GROUP