

Subject:	Update on VPK's actions to meet Europe's Green Deal directives
Date:	2026-07-01

The aim of this document is to provide our customers a summarised insight on actions taken by VPK to meet the requirements in terms of Europe's Green Deal initiatives and more specifically CSRD, CSDDD, EUDR and PPWR. VPK has a long-standing tradition of pioneering sustainability initiatives, ensuring compliance with regulations while advancing the company's objectives and mission. This document provides what VPK has set up, which tools it uses and how it copes with changing regulation.

Introduction & Management System

Despite not being publicly traded, VPK Group ensures **full transparency** by consistently communicating all actions and initiatives through our **annual Sustainability Reports**. They are published in the late Spring of every year. To measure progress on regulatory initiatives and company objectives in terms of sustainability, the company has a **Group Sustainability Steering Committee** meeting every quarter, gathering internal specialists on these topics and with the Divisional CEO's of the company.

Tools to meet recent regulations have been implemented. Next to our traditional ERP systems, **VPK decided to work with FutureProof to gather all information in terms of materiality topics**. The tool is mainly used to meet CSRD requirements. When it comes to **CSDDD, VPK has decided to work with Osapiens, which will be used as well for EUDR**. Still according to Europe's Directives, an external audit office has been appointed to validate figures. VPK Group NV **currently works with KPMG**.

Sustainability Reporting (SR) & CSRD

Since 2015, VPK publishes a set of sustainability indicators, including CO₂-emissions. In 2023, **VPK was awarded** for its *the "Best Impact Sustainability Report Award"* and for *"Best Report in Creativity and Originality"* across all companies in Belgium, confirming its expertise in reporting¹. In 2025, VPK was again recognized with the *the "Most Readable and Most Accessible Sustainability Report"* across all companies in Belgium, further reinforcing its leadership in reporting excellence².

Willing to continue its journey, VPK is committed to comply with CSRD. The **chosen materiality topics** are: E1 Climate, E3 Water, E5 Resource Use & Circularity, S1 Own Workforce and S2 Workers in the Value Chain. Next to that, additional requirements are covered: double materiality, carbon footprint & SBTi, EU Taxonomy, GAP Analysis and a dry-run process.

The Omnibus directive refers to a package of legislative proposals within the European Union (EU) that aims to simplify existing sustainability rules and regulations.

¹ <https://vpkgroup.com/en/sustainability/impact---awards>

² Press Release Winners 2025

Essentially, it is a comprehensive set of changes that streamlines and modifies various EU sustainability initiatives into a single, more manageable framework. Based on the initial CSRD, VPK had to report on Fiscal Year 2025 as from 2026, the **Omnibus Directive** brought some changes in that timeline requirement: VPK is subjected for reporting on FY2027 in 2028. When it comes to the materiality topics, **VPK decided to integrate the materiality E1-Climate and E3-Water in its first SR25.** The other three topics will be covered gradually over the coming years during the next sustainability report publications to **meet the 2028 requirements.**

CSDDD

VPK will be **eligible for the CSDDD as from July 2029, however,** VPK already prepared a set of elements to meet the requirements **since summer 2024:**

- CSDDD impact analysis with as risk analysis tool Osapiens, compatible with our ERP systems and compliant for EUDR matters. The aim is to have everything available in Osapiens by Q1/2026.
- Sustainable procurement policy & procedure approved by EXCOM³.
- 3000 vendors uploaded for initial risk mapping. Upload high/mid risk vendors into continuous monitoring score. Remaining topics is to upload the amended Supplier Code of Conduct and Supplier Self Questionnaire in Osapiens for signing by vendors. Target date: Q1/2026

EUDR

The paper produced by VPK is made entirely from recycled fibres and is therefore not subject to the EUDR requirements. However, a limited portion of the paper used within our Packaging Division is virgin fibre-based and sourced from external suppliers. As a result, VPK is required to comply with the EUDR. Within the framework of the regulation, VPK is classified as a **downstream operator.**

Following several revisions during the legislative process, the EUDR reached its final form in June 2026. Based on the final regulation, the key principles can be summarized as follows:

- The primary responsibility for EUDR compliance lies with **the first placer on the market.**
- The operator first placing the relevant commodity (wood) on the EU market is responsible for ensuring full EUDR compliance.
- As a downstream operator, VPK purchases materials that are already covered by a valid Due Diligence Statement (DDS) reference number and is therefore not required to conduct additional due diligence on those materials.

³ https://vpkgroup.com/-/media/project/corporate/content/sustainability/vpk-group-policies/2025-vpk-group_sustainable-procurement-policy.pdf

To ensure full compliance with the regulation, VPK has implemented the following approach:

- VPK exclusively sources virgin fibre-based paper originating from low-risk countries within the European Union and/or the European Economic Area (EEA).
- VPK continues to perform risk assessments through Osapiens, the dedicated compliance platform also used to support CSDDD requirements.
- Suppliers of virgin fibre-based paper are required to provide valid DDS reference numbers. VPK records and maintains these references against the corresponding purchase orders and supplier invoices.
- The Central Procurement Team conducts periodic random audits to verify that suppliers correctly apply the required EUDR processes.
- As a downstream operator, VPK is not required to provide DDS reference numbers or geolocation data to its customers and therefore does not share this information.

CO₂-assessment & reporting demands on CO₂

Although an important work is being done in terms of complying with regulations, high attention has also been given to reduce our CO₂ footprint and connect this with our goods sold. VPK has a set of tools to support our customers on identifying the CO₂ impact of the goods bought. Integrated within our ERP system, VPK can provide a full extracted list of CO₂ emissions per customer materials. On top of that, VPK has a carbon footprint calculator, allowing interactive simulation and calculations to support lower carbon footprint.

- The CO₂ emissions per box sold is based on the PACT methodology⁴ (version 2), itself ISO14001 certified and used by major international companies⁵ such as P&G, Unilever, Nestlé, SAP, Siemens, Dow, Bayer, and Novartis. The PACT-methodology is part of GHG Accounting Standards⁶ and has produced a set of data matrices to proceed to accurate carbon footprint calculation principles.
- Data on existing boxes sold from VPK to its customers, can be requested at any time by the customer to VPK. VPK will provide an overview of the box material number, box material description and the CO₂ emissions per box sold. If needed, VPK can provide the quantity of goods sold. In that way, the customer will immediately have the CO₂ impact, needed for its scope 3 calculation.

PPWR

⁴ <https://www.carbon-transparency.org/pact-methodology>

⁵ <https://www.carbon-transparency.org/>

⁶ <https://ghgprotocol.org/standards-guidance>

The new Packaging and Packaging Waste Regulation (PPWR) aims at reducing the increasing volume of packaging waste and preventing its further growth by 2030. It entered into force on 11 February 2025 and will apply generally from 12 August 2026, with longer transition periods applying to certain requirements.

It applies to all economic operators, from manufacturers, suppliers and importers to distributors and fulfilment service providers. According to FEFCO's current understanding, corrugated packaging companies are typically considered either manufacturers (B2C, or web-sales to end customers) or suppliers (all standard corrugating plants: B2B). The requirements in PPWR for reporting are much higher for manufacturers (mainly our customers: brands, retail, traders, ...) than for suppliers (the standard corrugated box plants). However, to accurately identify the specific obligations that apply, each company must assess its role within the supply chain and consult with internal operational and legal departments. **VPK can be both supplier as manufacturer depending on who you deliver.**

PPWR is a vast regulation, and this summary aims to capture essentials impacting the relation between VPK and its customers. Major milestones are 2026 regarding PFAS, Heavy Metals (HM) and Bisphenols; 2027 requests compliancy on Extended Producer Responsibility (EPR) and 2028 compliance on packaging labelling. Across all these milestones, the Commission expects manufacturers of packaging goods to increase efforts on packaging reduction and recycling.

1. Substances in packaging (Article 5 of PPWR)

On the topic of microplastics within PPWR:

- VPK has done its due diligence across its supply chain and manufacturing processes. As an outcome, only certain inks (more specific: the extenders) used in the printing process of corrugated packaging might have microplastics. As a conclusion, VPK requested all its ink suppliers to comply with PPWR and as a consequence, micro-plastics in inks/extendors will be substituted by eco-extendors complying with PPWR. **VPK will comply by October 2026 on that target.**

On the topic of heavy metals (HM)

- Two aspects need to be considered: in what way heavy metals are added in the production process and the level of heavy metals that can be found in VPK's products. On the first part, **VPK does not add intentionally heavy metals** in its production process. On the second part, VPK conducts currently several tests. Paper being the main component of a corrugated box, analysis has been conducted at VPK Paper⁷ on heavy metals. **Results have shown**

⁷ VPK Alizay Paper SAS, VPK Paper NV and Blue Paper SAS

compliance with European regulations. FEFCO has done similar tests on corrugated boxes and is coming to the same result. Hence – and within the EU – each country can request stricter thresholds and/or different measuring processes. Sample tests on corrugated boxes are being conducted to confirm compliance.

On the topic of per- and polyfluoroalkyl substances (PFAS):

- PFAS is a common abbreviation used for a complex group of synthetic chemicals and are often called “forever chemicals”. PFAS takes an important point of attention within the PPWR, hence we need to be careful.
- PFAS restrictions apply exclusively to Food Contact Materials (FCM). However, since FCM is defined as “materials in direct physical contact with food or in indirect contact through the gas phase,” the majority of our food packaging falls within the scope.
- At first, the Commission (through PPWR) has stated the maximum thresholds per categories of PFAS (25ppb, 250 ppb and 50 ppm depending on the type of PFAS), but due to the high number of PFAS-types, this is complex. Second, the Commission (through PPWR) has not stated the way PFAS needs to be measured. As a consequence, this makes it pretty difficult for manufacturers to identify how its PFAS-performance complies with PPWR requirements. Hence the commission has recently approved the test proposal by RISE, formal validation & publication still needs to happen.
- **VPK does not intentionally add PFAS in its production process** of paper nor of corrugated packaging. Its suppliers have confirmed the same approach. When it comes to bisphenol A & B, same approach: not intentionally added in the production process.
- VPK conducts **every second year some PFAS analysis** on a selection of categories with an ISO-certified (17025 & 22000) laboratory Eurofins. Results over time show stable values below the PPWR thresholds and latest tests were performed in Q4 2025.

2. On the topic of Declaration of conformity:

- The target date is set at August 2026 and **is the duty of the manufacturer** (company using the packaging products: brands, retail, traders, ...). This means the manufacturer needs to comply with a “Conformity Document” that needs to be made per material. Yet, no definition has been established on the definition on what a material might be. On the content of the “Conformity Document”, PPWR refers to Annex 7. PPWR does not make a distinction between primary, secondary and tertiary packaging and all type of packaging should be considered. VPK wants to support its customers (as

being mainly the manufacturers according to PPWR) in establishing this Conformity Document.

- When VPK is seen as the supplier, it can send the required technical data, a compliance statement and, if specifically requested by the customer, test reports.
- When VPK is seen as the manufacturer, it has all the relevant documents and sets up the Declaration of conformity.

3. On the topic of Producers & Extended Producer Responsibility (Section 3):

- Extended Producer Responsibility (EPR) by making producers fully financially and organizationally responsible for packaging waste management, covering costs like collection, sorting, and recycling. The PPWR mandates eco-modulated fees based on recyclability, requires producers to register and report detailed data in each Member State. It enters into force as from August 2026. First reporting will have to be done in August 2027.
- Hence, some countries might already meet the EPR target by being organized through a PRO: Producer Responsibility Organization. VPK is member of these PROs amongst most of countries of it operates. The Government in Denmark decided to set up a separate system to meet the EPR's requirements. VPK Denmark did adapt to it. **VPK will comply by August 2026 on that target.**
- Standard corrugated box plants will only be required to report EPR data to the PROs for the transport packaging materials we use to “package” our own products: pallets, straps, wrap, bottom sheets, top sheets, interlayers, and bundle straps. This reporting must be carried out in each EU Member State and responsibility depends on the following scenarios:
 - If the manufacturer is located in the same Member State where the packaging becomes waste, the manufacturer is considered the producer and is responsible for reporting.
 - If the manufacturer is not located in the Member State where the packaging becomes waste, the producer is another company established in that Member State (e.g. distributor, importer, or unpacker), which then takes care of the reporting.
 - **For online sales to the end-consumer**, the making available on the market is in the Member State where the end-user is located.
- We will support customers by providing the required data (weight, recyclability, recycled content, etc.).

4. Other remaining targets on the longer term within PPWR:

- **Recyclability of packaging (Article 6):** Corrugated packaging shall be recyclable by 2030 and respect the recyclability assessment criteria currently

elaborated under the secondary legislation. This is no issue for VPK Corrugated, except for PE-coated products.

- **Packaging Minimisation & Empty Space Ratio (Articles 10 and 24):** The regulation promotes the design of packaging that minimises material use and ensures grouped packaging; transport-, grouped packaging or e-commerce packaging should have a maximum empty space ratio of 50 % from 2030. Sales packaging will have the 50 % restriction from 2028. This is included in VPK's box design process with customers. **VPK supports his customers in developing packaging that meet this requirement.**
- **Reusable transport packaging and reuse targets:** Cardboard boxes are fully exempt from reuse targets under Article 29, but other transport packaging types are in the scope. Companies will have to comply with the reuse targets for their own packaging or logistic system. However, by 2030 100% of pallets will be required to be reused (for example, through a pooling or return system) for deliveries in same member state. Straps and wraps are exempt from the reuse requirement.
- **Harmonised Labelling (Articles 12 and 13):** as of 12 August 2028, all packaging that reaches final customers must carry a specific, defined label indicating recyclability, substances of concern, compostability, and other required information.

