XIELI CAP MAKING CO., LTD (福建省晋江市协立制盖有限公司)

[[FILL: full registered address, Jinjiang, Fujian, China]]

Ref: LID260904 Date: 2026/09/04

To: Hoi Vu Company Limited — CAU GIAT INDUSTRIAL CLUSTER, RESIDENTIAL GROUP NO 3, HOA MAC WARD, DUY TIEN TOWN, HA NAM PROVINCE, VIETNAM

DECLARATION OF CONFORMITY

Subject: Twist-off metal closures supplied to Hoi Vu Company Limited, with reference to Articles 5(4) and 5(5) of Regulation (EU) 2025/40 (PPWR)

Dear Sir or Madam,

1. Product and packaging role

XIELI CAP MAKING CO., LTD supplies twist-off metal closures (type / nominal diameter(s): 70mm RTS, 77mm RTS; 82mm RTS to Hoi Vu Company Limited for sealing the 370 ml, 540ml, 720 ml and 1,000 ml glass jars exported to the European Union. The closures are primary packaging in direct contact with food. Each closure consists of: (a) a metal shell made of [[FILL: chromium-plated (tin-free) steel sheet / tinplate]]; (b) a PVC sealing gasket ("Sealing Compound 1"); and (c) an internal lacquer (food-contact coating) on the inner surface of the shell.

2. Heavy metals — Article 5(4)

We hereby declare that the sum of the concentrations of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr(VI)) in the closures supplied to Hoi Vu does not exceed 100 mg/kg (0.01% by weight), in accordance with Article 5(4) of Regulation (EU) 2025/40 (Packaging and Packaging Waste Regulation), which reproduces the requirement previously established by Article 11 of Directive 94/62/EC. Specifically:

(a) PVC sealing gasket. Tested by EMTEK Dongguan, report no. EDG2607100108C00101R of 16 July 2026, on sample "Sealing Compound 1" (PVC): Cd, Pb, Hg and Cr(VI) all not detected; the four-metal sum is not detected, against the legal limit of 100 mg/kg, cited in the report to Regulation (EU) 2025/40.

(b) Metal shell. [[CONFIRM: We confirm that the shell of the closures supplied to Hoi Vu is manufactured from the chromium-plated steel sheet (镀铬板) of Jiangsu Suxun New Materials Technology Co., Ltd, Shuyang, Jiangsu, covered by SGS Shanghai report no. SHAEC26013380302 (job SHP26-016946) of 18 May 2026, in which Pb, Hg and Cd were all not detected (MDL 2 mg/kg) and Cr(VI) was not detected by the surface method; on the basis of these results, the four-metal sum of the shell material does not exceed 100 mg/kg. — if this is not correct, strike this sentence and initial it]] Based on the technical information given by our raw material suppliers, the sum of Pb + Cd + Hg + Cr(VI) in the shell material as supplied does not exceed 100 mg/kg. We do not perform any specific tests for this purpose beyond the assessments carried out by our raw material suppliers.

(c) Internal lacquer. Based on the technical information given by our coating suppliers [[FILL — optional: supplier name(s)]], the sum of Pb + Cd + Hg + Cr(VI) in the internal lacquer applied to the closures does not exceed 100 mg/kg. We do not perform any specific tests for this purpose beyond the assessments carried out by our raw material suppliers.

(d) Closure as a whole. On the basis of (a), (b) and (c) above — the tested sealing gasket, the shell material and the internal lacquer — the closures as a whole supplied to Hoi Vu comply with Article 5(4): the sum of Pb + Cd + Hg + Cr(VI) does not exceed 100 mg/kg.

3. PFAS — Article 5(5)

With reference to points (a), (b) and (c) of Article 5(5) of Regulation (EU) 2025/40, we hereby declare that:

(a) PVC sealing gasket. Per- and polyfluoroalkyl substances (PFAS) are not intentionally added to the gasket. This is supported by: EMTEK Suzhou report no. ESZ2605070317C00101R of 13 May 2026 — PFAS screen of 306 substances, all not detected (specification limit 0.025 mg/kg); and EMTEK Suzhou report no. ESZ2605210275C00101R of 29 May 2026 — total fluorine not detected (MDL 30), against the specification limit of 50 mg/kg.

(b) Metal shell and internal lacquer. Based on the technical information given by our suppliers of steel and coatings, PFAS are not intentionally added to the shell material or to the internal lacquer at any stage of their manufacture. [[FILL — optional: "Supported by test report no. …, issued by …, dated …" — delete this bracket if no test data is held.]]

(c) Closure as a whole. PFAS are not intentionally added to the closures supplied to Hoi Vu.

4. Supporting test reports

Component	Laboratory	Report no.	Date	Sample	Key result
PVC sealing gasket	EMTEK Dongguan	EDG2607100108C00101R	16/7/2026	Sealing Compound 1 (PVC)	Cd, Pb, Hg, Cr(VI) all ND; four-metal sum ND; limit 100 mg/kg; cited to (EU) 2025/40
PVC sealing gasket	EMTEK Suzhou	ESZ2605070317C00101R	13/5/2026	Sealing Compound 1	PFAS, 306 substances screened — all ND (limit 0.025 mg/kg)
PVC sealing gasket	EMTEK Suzhou	ESZ2605210275C00101R	29/5/2026	Sealing Compound 1	Total fluorine ND (MDL 30; limit 50 mg/kg)
Shell steel (per confirmation in section 2(b))	SGS Shanghai	SHAEC26013380302 (job SHP26-016946)	18/5/2026	Chromium-plated steel sheet; applicant Jiangsu Suxun New Materials Technology Co., Ltd	Pb, Hg, Cd all ND (MDL 2 mg/kg); Cr(VI) ND by surface method

5. Validity

This declaration is valid for twelve (12) months from the date of issue.

6. Signature

for XIELI CAP MAKING CO., LTD

Name: [[FILL]]

Title: [[FILL]]

Date: [[FILL]] 2026.9.4.

Signature:

(Company seal / chop)