

2023 Statement of Product Compliance

Quality Management System: The BoxMaker, Inc. (The Company) has a formal Quality Management System which is built upon standards and controls of ISO, however, The Company is not underwritten by a third party for certification.

FDA Letter of Guarantee:

- Unbleached Kraft paper and containerboard products (including paperboard made from pulp derived from reclaimed fiber) produced by The Company at its facilities comply with the Federal Food, Drug and Cosmetic Act Title 9 for paper contacting meat and poultry food products at temperatures below 150 degrees Fahrenheit, and under FDA Department of Health and Human Services regulations, Title 21 CFR Sections 176.170 and 176.180, as applicable to indirect food additives and for components of paper in contact with aqueous and fatty foods as well as dry foods.
- Petroleum wax (paraffin wax) and clear coatings also comply for contacting food products, including aqueous and fatty foods, per the above regulations.
- Adhesives (glues), including double-sided adhesive tape, comply for indirect contact with food items only, per 21 CFR Section 175, especially 175.105 and 175.106.
- Inks may be used on packages containing food items when the ink is on the outside of the packaging, i.e. not in direct contact, per 21 CFR Section 175. (Please contact your company representative for special, inside ink & coating applications that are permitted to come into contact with food items.)
- Genetically Modified Organisms (GMO's)-A small amount of starch is used in the corrugated manufacturing process which may be created from genetically modified plants.
- The Company does not perform or conduct product testing on animals
- As The Company is not a food facility, it is not required to register with the FDA. As such, it does not readily provide a statement, letter, or other documentation on the Bioterrorism Act of 2002, BSE/TSE (Bovine Spongiform Encephalopathy), Halal, or Kosher practices.

ECF Bleaching: Bleached paperboard used by The Company is produced using an elemental chlorine free ("ECF") bleaching process.

California Proposition 65 (California Safe Drinking Water & Toxic Enforcement Act of 1986):

Standard Corrugated Packaging: The Company's products made from Kraft containerboard are not considered a significant risk under these regulations.

Digital Printed Packaging:

HDR: Carbon Black is present in HP HDR230 Scitex black inks (HP HDR230 Scitex Inks CP814 through CP819 series) and is classified as a carcinogen under IARC and by the state of California under Proposition 65 in its liquid form. In their evaluations of carbon black, both organizations indicate that exposure to carbon black, per se, does not occur when it remains bound within a product matrix, specifically, rubber, ink, or paint.

The California Proposition 65 listing for carbon black only applies to: "Airborne, unbound particles of respirable size [≤ 10 micrometers]."

In the listed inks above, carbon black is in a bound form. As such, the California Proposition 65 listing for carbon black does not apply.

C500: The standard Overprint Varnish used during The Company's printing process contains chemicals including 1,4-Dioxane and Ethylene oxide which are known to the State of California to cause cancer. Ethylene oxide is known to cause birth defects or reproductive harm.

Per Safe Harbor requirements, the measured content of these chemicals are below significant risk levels:

Ethylene Oxide— No Significant Risk Level ≤ 2 Micrograms (equivalent to 2 ppm)
1,4 Dioxane Oxide—No Significant Risk Level ≤ 30 Micrograms (equivalent to 30 ppm)

The product is guaranteed FDA compliant with the following regulations published in Title 21 of the Code of Regulations (21 C.F.R.) which permits the use of this product in indirect contact with food:

21CFR.176.170 Components of paper and paperboard in contact with aqueous and fatty foods
21CFR.176.180 Components of paper and paperboard in contact with dry foods

Please contact your company representative for special coating applications that are permitted to come into contact with food items.

Foam & Label: The Company is not aware of any significant risks under these regulations for materials/processes used for foam/label products

Canadian Food Inspection Agency: The Company holds a current letter of non-objection from the Canadian Food Inspection Agency. A copy of this letter is available upon request.

REACH and State of California Reductions of Toxics in Packaging/Coalition of Northeastern Governors (CONEG): The Company certifies that all packaging and packaging components comply with the requirements of the toxics in packaging laws. Specifically, (1) We certify that the regulated metals lead, cadmium, mercury, or hexavalent chromium were not intentionally added to any packaging or packaging component during the manufacturing process; (2) We further certify that the sum of incidental trace quantities of lead, cadmium, mercury, or hexavalent chromium in any packaging or packaging component does not exceed 100 parts per million by weight; (3) The Company will maintain adequate documentation of this certification for inspection upon request.

Our products have been reviewed and compared to the below list of restricted substances. To the best of our knowledge these chemicals are not present in our supplied products and any incidental trace quantities are within safe harbor limits of <1000 ppm.

<https://echa.europa.eu/substances-restricted-under-reach>

(Reviewed for June 14, 2023 updates)

RoHS Certification: This is to certify that The Company's products do not contain, at the date of shipment or delivery, any hazardous substances as described in the RoHS Directive, to include: lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ether (PBDE), Bis(2-Ethylhexyl) phthalate (DEHP), Benzyl butyl phthalate (BBP), Dibutyl phthalate (DBP), and Diisobutyl phthalate (DIBP). Should incidental levels of the above-mentioned materials be present, these levels conform to the allowable limits as described in the Directive; <1000 ppm (except for Cadmium, which is limited to <0.01% or <100 ppm).

Further clarification of The BoxMaker RoHS Declaration for EU Directive(s) 2002/95/EC, 2011/65/EU, or 2015/863/EU: The BoxMaker neither manufactures, nor sells as a distributor, any product that meets the definition(s) of Electrical & Electronic Equipment (EEE) as defined by the EU Directive(s) 2002/95/EC, 2011/65/EU, or 2015/863/EU, on the restriction of the use of certain hazardous substances in electrical and electronic equipment. Therefore, The BoxMaker provides no 'Statement or Letter of RoHS Declaration' related to EEE."

PFAS: The Company does not intentionally use Per-and Poly-fluoroalkyl Substances (PFAS) in any of its manufacturing processes. It is not aware of their use in any purchased raw materials.

US TSCA PBT Substances: The Company's products are not manufactured using nor, to the best of our knowledge do they contain Decabromodiphenyl ether; Phenol, isopropylated phosphate; 2,4,6-Tris (tert-butyl) phenol; Hexachlorobutadiene; Pentachlorothiophenol. It is not aware of their use in any purchased raw materials.

Persistent Organic Pollutants: The Company's products are, to the best of our knowledge free of pesticides, chlorine and chlorine containing chemicals, polychlorinated biphenyls and hexachlorobenzene. It is not aware of their use in any purchased raw materials.

FDA/Latex Certification: The Company's paper and containerboard products are not manufactured using nor, to the best of our knowledge do they contain, natural rubber or natural latex compounds as defined in 21 CFR 801.437.

Ozone Depleting Substances: The Company assures their customers that none of the class 1 or class 2 ozone depleting chemicals listed in sections 602(a) and 602(b) of the 1990 Clean Air Act are contained in or come in contact with any of our products.

FDA Allergen Review: The Company does not knowingly add the following ingredients to its products as major components but the use or presence of these ingredients are neither tracked nor tested: peanuts, tree nuts, sesame seeds, dairy products, eggs, fish, shellfish, soy products, wheat, gluten or tartrazine. The following ingredients are known to exist in our products although the levels present are unknown and not tested: sulfites (from the Kraft pulping process), and corn products (from corn starch addition to paper).

FSC/SFI Certification: Since The Company owns no forest land they hold neither FSC nor SFI certification. However, we have agreed to adhere to a set of forestry principles outlined in the Sustainable Forest Initiative (SFI) of the American Forest & Paper Association (AFPA). The SFI is similar to the FSC but is more common among American pulp and paper manufacturers. The principles of SFI call for a land stewardship ethic, which integrates the reforestation, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water resources, wildlife and fish habitat, and forest aesthetic values.

Organic Food Packaging: The Company does not intentionally add synthetic fungicides, preservatives or fumigants to their packaging products. Some of The Company's corrugated vendors may add biocides during the starch-based adhesive preparation process, so as to prevent biodegradation prior to use of the starch-based adhesive in the manufacture of corrugated sheets. The biocides are suitable for use in direct food contact packaging, are added to the raw material at very low levels and have no functional purpose in the finished packaging product or food packaged in the finished product.

Reviewed 10/9/2023



Daniel Dixon
Director of Operational Excellence