

PPWR Compliance Statement – ALEF Group

This statement describes the approach of the relevant ALEF Group companies to addressing the obligations applicable to their respective roles under Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) in relation to products supplied by ALEF Group companies, including products from Cisco, NetApp, F5, Microsoft, Palo Alto Networks, ExaGrid and other vendors.

Depending on the relevant supply chain, an ALEF Group company may act either as a **distributor under Article 19 PPWR** or, where it imports packaged products or packaging from outside the European Union and places such packaging on the EU market, as an **importer under Article 18 PPWR**. An ALEF Group company may also, depending on the relevant supply chain and relevant EU Member State, qualify as a producer for extended producer responsibility (EPR) purposes under the PPWR. For the purposes of this statement, references to "ALEF" mean the relevant ALEF Group company acting in the applicable supply chain.

ALEF acting as distributor

Where ALEF acts as a distributor, it performs the verification required under Article 19 PPWR, including, where applicable, verification of:

- the registration status of the producer subject to extended producer responsibility obligations in the relevant producer register under Article 44 PPWR, where applicable;
- the required packaging labelling;
- the packaging identification information and the identification and contact information of the manufacturer and importer; and
- other requirements which distributors are expressly required to verify under the PPWR.

Where ALEF considers or has reason to believe that packaging does not comply with the requirements referred to in Article 19(3) PPWR, it will not make such packaging available on the market until the relevant non-compliance has been resolved.

ALEF acting as importer

Where ALEF imports packaged products or packaging from outside the European Union and places such packaging on the EU market, it performs the additional verification required under Article 18 PPWR.

Before placing such packaging on the EU market, ALEF ensures, where applicable, that:

- the manufacturer has carried out the required conformity assessment;
- the required technical documentation has been prepared;
- an EU Declaration of Conformity has been drawn up;
- the packaging is accompanied by any documents required under the PPWR;
- the packaging complies with the applicable labelling and identification requirements; and
- ALEF's importer identification and contact information is provided as required by the PPWR.

ALEF will not place packaging on the EU market where it considers or has reason to believe that the packaging does not comply with the applicable requirements laid down in or pursuant to Articles 5 to 12 PPWR.

Extended producer responsibility (EPR)

Where an ALEF Group company qualifies as a producer for extended producer responsibility (EPR) purposes, applicable EPR requirements may include registration, reporting and financial

obligations under Articles 44 and 45 PPWR. Relevant packaging category and weight data required for applicable EPR reporting therefore needs to be available.

Documentation workflow

EU Declarations of Conformity and related technical documentation must be drawn up under the responsibility of the manufacturer within the meaning of the PPWR.

ALEF does not routinely attach EU Declarations of Conformity or technical documentation in paper form to individual deliveries, goods issue notes or waybills, nor does it routinely send such documentation by email with each delivery.

Where ALEF acts as an importer, it ensures that the documentation required under Article 18 PPWR is available in accordance with the applicable regulatory requirements.

ALEF will provide relevant information and documentation to competent authorities where required under the PPWR.

Packaging information in delivery and transport documents

The PPWR does not generally require distributors or importers to state the packaging material type or packaging weight of each individual shipment on standard warehouse, delivery or transport documents.

Accordingly, ALEF does not include packaging type or packaging weight in standard delivery notes, waybills or other transport documentation solely for the purpose of PPWR compliance.

This statement is provided to support ALEF customers in understanding ALEF's PPWR compliance process. It is provided for information purposes and does not constitute a contractual warranty or guarantee of compliance. It does not replace or transfer obligations imposed directly on individual economic operators under Regulation (EU) 2025/40.