

ARTROM STEEL TUBES S.A.

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Subscribed and Paid Share Capital: 1.276.594.955,68 lei

No. 156/1742/ Date 23.10.2026

To: Customers and business partners of ARTROM STEEL TUBES S.A.

PRELIMINARY DECLARATION

regarding the characteristics of packaging materials used for the delivery of steel tubes, based on the documentation available, in the context of Regulation (EU) 2025/40 (PPWR)

In the context of the application of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR), ARTROM STEEL TUBES S.A. is conducting an inventory of the packaging components used, together with the collection, verification and updating of the technical and compliance documentation received from suppliers.

As a manufacturer of steel pipes, ARTROM STEEL TUBES S.A. uses various packaging materials and components for the preparation, handling and transportation of its products, depending on product characteristics, contractual requirements and the specific configuration of each shipment.

1. Categories of packaging materials used

Depending on the product type and the packaging method, bundles of steel pipes may include, as applicable:

- metal strapping and metal seals used for bundling and securing the pipe bundles;
- plastic plugs and protective caps fitted to the ends of the pipes;
- composite protective materials used for the external wrapping of pipe bundles, consisting of wood fibres, paper and polymer components (Lamiflex wrapping material);
- textile slings used for supporting and handling the bundles;
- wooden boxes, spacers and crosspieces used for packaging, separating and supporting the bundles;
- polymeric spacer rings used to protect the pipes;
- laminated identification labels and metal fastening elements (staples);
- plastic film.

2. Available documentation and status of the assessment

For some packaging materials, ARTROM holds supplier declarations, EU declarations of conformity, technical data sheets or other relevant information. For documentation that is not yet available, the relevant documents are currently being requested, supplemented or verified.

The information provided by the manufacturers and suppliers of the components is used as supporting evidence in the assessment of the requirements applicable to packaging. The existence of such documentation is not, in itself, presented as evidence of full compliance of all packaging configurations used by ARTROM.

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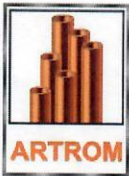
LRQA:
ISO 9001
ISO 14001
ISO 45001

LRQA:
IATF 16949

TUV:
PED/AD-2000 W0/W4
Vd TUV

TUV CPR:
EN 10210-1,2
EN 10255

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3. Clarifications regarding recyclability

Steel and wood used in packaging components are materials for which recycling and recovery options are available.

The actual recyclability of the components and packaging depends on their composition, any applicable surface treatments, compliance with Design for Recycling (DfR) criteria, and the availability of appropriate collection, sorting and recycling streams.

4. Statements regarding heavy metal concentrations

For the steel strapping and metal seals purchased, as well as for the composite protective material, the suppliers declare compliance with the cumulative concentration limit of 100 mg/kg for lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium [Cr(VI)], in accordance with Article 5 of Regulation (EU) 2025/40.5. Provision of documentation

Upon request from customers, ARTROM will provide the available and relevant supporting documentation for the packaging materials associated with the products delivered, including Declarations of Conformity and technical data sheets, taking into account the legislation in force at the date of the request and the implementation timeline of Regulation (EU) 2025/40.

The documentation will be provided subject to commercial confidentiality requirements and any restrictions imposed by the issuing parties or suppliers.

6. Preliminary nature of this declaration

This declaration reflects the status of the documentation process as of the date of issue and is intended for informational purposes only. It is preliminary in nature and does not constitute the EU Declaration of Conformity provided for under Article 39 and Annex VIII to Regulation (EU) 2025/40. It does not replace the conformity assessment of the final packaging and does not constitute a general certification of recyclability, recycled content or full compliance of all components.

ARTROM will continue the process of verifying and completing the relevant information, taking into account the applicable PPWR obligations and the implementation deadlines for specific requirements. This declaration may be updated as additional documentation is received and validated.

Yours sincerely,

ARTROM STEEL TUBES S.A.

Quality, Environment and Integrated Management Systems Director

Magdalena Popescu

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