



EU DECLARATION OF CONFORMITY

*In Accordance with EU Packaging and Packaging Waste Regulation
(PPWR, Regulation (EU) 2025/40)*

DoC No. : UADOC-PPWR-2026001

1. Manufacturer & Product Identification

Manufacturer Name: Clientron Corp.

Registered Address: 3F., No. 75, Sec. 1, SINTAI 5th RD., Sihhih Dist., New Taipei City 221, Taiwan (R.O.C.)

Product Category: Desktop Thin Client

Product Model: UA2 N260, UA3 N370, UA7 N700

2. Statement of Responsibility

This declaration of conformity is issued under the sole responsibility of the manufacturer (Clientron Corp.). We hereby declare that the packaging system supplied with the above-mentioned product line is in conformity with the relevant Union harmonization legislation: Regulation (EU) 2025/40 on packaging and packaging waste and its applicable requirements.

3. Harmonized Regulations & Compliance Standards

- **Regulation (EU) 2025/40 (PPWR):** EU Packaging and Packaging Waste Regulation, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC
- **PPWR Article 5:** Heavy Metals Concentration ($Pb + Cd + Hg + Cr VI \leq 100$ ppm) & Substances of Concern
- **PPWR Article 6 & Annex II:** Design for Recycling (DfR) - Minimum Grade C Compliance (Targeting Grade A $\geq 95\%$ for Paper/Cardboard packaging)
- **PPWR Article 7:** Minimum Recycled Content in Plastic Packaging (PCR Tracking for 2030 Limit $\geq 35\%$)
- **PPWR Article 10:** Packaging Minimization & Maximum Void Ratio $\leq 50\%$
- **PPWR Article 12:** Labelling and Material Identification Marking (in alignment with Commission Decision 97/129/EC for PAP 20, PAP 22, LDPE 4, PP 5)
- **PPWR Article 26:** Obligations Related to the Use of Transport Packaging & Pallets
- **PPWR Article 39 & Annex VIII:** EU Declaration of Conformity requirements and Technical Documentation structure.
- **REACH Regulation (EC) No 1907/2006:** Annex XVII Restrictions

4. Detailed Breakdown of Packaging Components

The following table details all packaging components associated with UA2 N260, UA3 N370, UA7 N700 categorized by packaging tier per PPWR Article 3 definitions and mapped to applicable compliance articles:



Item	Description	Material & EU Code (97/129/EC)	Packaging Hierarchy	Applicable PPWR Articles
1	LABEL_1 (Rating & Conformity Logo)	PP 5	Product Component (Exempt from PPWR Scope)	Article 3 (Definitions) [RoHS / REACH Compliant]
2	LABEL_2 (For Representative Agent)	PP 5	Product Component (Exempt from PPWR Scope)	Article 3 (Definitions) [RoHS / REACH Compliant]
3	LABEL_3 (For Machine Identification)	PP 5	Product Component (Exempt from PPWR Scope)	Article 3 (Definitions) [RoHS / REACH Compliant]
4	User's Manual	PAP 22	Product Component (Exempt from PPWR Scope)	Article 3 (Definitions) [RoHS / REACH Compliant]
5	Gift Box	PAP 20	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 10, 12 REACH Annex XVII
6	Cushion Paper (For CRADLE)	PAP 22	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 12 REACH Annex XVII
7	Cushion Paper (For Adaptor)	PAP 22	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 12 REACH Annex XVII
8	BAG PE (Machine Protection)	LDPE 4	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
9	LABEL_4 (Product Configuration)	PP 5	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
10	Sealing Tape (for PE Bag)	PP 5	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
11	Cushion Cardboards (Fix the cushion in box)	PAP 20	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 10, 12 REACH Annex XVII
12	Cushion (Fix the machine in Box)	PAP 20	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 10, 12 REACH Annex XVII
13	Accessory Box	PAP 20	Sales Packaging (Primary Packaging)	PPWR Article 5, 6, 10, 12 REACH Annex XVII
14	Master Carton	PAP 20	Grouped Packaging (Secondary Packaging)	PPWR Article 5, 6, 10, 12 REACH Annex XVII
15	Label_5 (On Master Carton)	PP 5	Grouped Packaging (Secondary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
16	Label_6 (On Master Carton)	PP 5	Grouped Packaging (Secondary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
17	Label_7 (On Master Carton)	PP 5	Grouped Packaging (Secondary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII



18	Sealing Tape (On Master Carton)	PP 5	Grouped Packaging (Secondary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
19	Paper Pallet	PAP 20	Transport Packaging (Tertiary Packaging)	PPWR Article 5, 6, 12, 26 REACH Annex XVII
20	Pallet Stretch Wrap (Pallet load stabilization)	LDPE 4	Transport Packaging (Tertiary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
21	PE Pallet Top Sheet (Pallet load stabilization)	LDPE 4	Transport Packaging (Tertiary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
22	PP Strapping Band (Pallet load stabilization)	PP 5	Transport Packaging (Tertiary Packaging)	PPWR Article 5, 6, 7, 12 REACH Annex XVII
23	Paper Corner Protector (Pallet load stabilization)	PAP 20	Transport Packaging (Tertiary Packaging)	PPWR Article 5, 6, 12 REACH Annex XVII
24	A4 Paper	PAP 22	Transport Packaging (Tertiary Packaging)	PPWR Article 5, 6, 12 REACH Annex XVII

5. Note on Product Components and Documentation Classification

Pursuant to PPWR Article 3(1), Item 1, Item 2, and Item 3 are permanently affixed to the hardware chassis for regulatory and identification functions, and Item 4 (User's Manual) serves as an essential product documentation medium. All of these items form an integral part of the product system and are therefore exempted from the scope of PPWR DoC, TCF, and EPR. However, they fully comply with REACH and RoHS directives.

6. Technical Documentation & Test Report Archiving

The manufacturer maintains a centralized Technical Documentation File (UADOC-PPWR-2026001) containing the following verifiable test reports and compliance declarations:

- **Heavy Metal Test Reports (Pb, Cd, Hg, Cr VI < 100 ppm):** Third-party laboratory test reports for all paper, plastic, and adhesive components per Article 5.
- **No Intentional PFAS Declarations:** Supplier declarations verifying no intentional addition of Per- and Polyfluoroalkyl Substances (PFAS) in PE bags, stretch films, and paper coatings per Article 5.
- **REACH SVHC & Annex XVII Compliance:** Supplier declarations confirming all packaging materials comply with REACH SVHC Candidate List ($\leq 0.1\%$ w/w) and Annex XVII restrictions.
- **Mineral Oil Free (MOSH/MOAH) Ink Reports:** Ink supplier test reports for Gift Box and User Manual printing per French Decree 2022-1294.
- **Packaging Minimization & Void Ratio Report:** Engineering calculation sheet verifying 10-in-1 Carton Void Ratio $\leq 50\%$ per Article 10.



- **ISTA 1A Structural Protection Reports:** DQA vibration and drop test reports proving mechanical protection necessity for machine carrier paper cushions per Article 10.
- **Pure Paper Base DfR Grade A/B Declarations:** Paper packaging suppliers declarations confirming paper-base without plastic lamination per Article 6.
- **Transport Packaging & Pallet Compliance (Article 26):** Paper Pallet Technical Specification including load spec sheets (Static/Dynamic Load) and 100% processed paperboard/corrugated cardboard structure per Article 26.

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Date: 2026.08.07

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2026.8.7.