



Responsible Wood Pulp Sourcing Policy

1. Objectives

This Responsible Wood Pulp Sourcing Policy outlines delfort's commitment to sustainably sourcing wood pulp. It provides the framework for our compliance with the European Union Regulation (EU) 2023/1115 on deforestation and forest degradation-free products (EUDR) as well as for setting groupwide standards, procedures, and taking group-wide or site-specific actions in this regard.

2. Scope of Policy

This Policy applies to all delfort sites, as well as to our wood pulp suppliers, located both within and outside of the European Union.

3. Policy Statement

3.1 Our commitment

We are committed to responsible environmental stewardship and to upholding high standards of environmental and social responsibility both within our own operations and throughout our supply chain.

We uphold a strict **no deforestation and no conversion of natural ecosystems** policy, with a cut-off date of **December 31, 2020**.

This includes our commitment to

- source only legal, traceable and deforestation-free/forest degradation-free wood pulp which contributes to responsible forestry and originates from sustainably managed forests, and to comply with applicable regulations and mandatory standards,
- source 100% of our wood pulp from suppliers certified by leading international forest certification programs, such as FSC™ (FSC-C109921) and PEFC, to comply with applicable standards and regulations, in particular the EUDR and
- support the protection of High Conservation Values (HCV).

In addition, we respect internationally recognized human rights, including the principles of the UN International Labour Organization (ILO).

3.2 Responsible Sourcing Principles

As we do not own or manage forest operations, our sustainability commitments are extended across the entire wood pulp sourcing value chain. To ensure responsible sourcing practices, we have therefore established the following Responsible Wood Pulp Sourcing Principles, which are mandatory for all wood pulp suppliers.

a) Certification and legality

We require our suppliers to uphold a certification according to internally leading forest certification programs such as FSC and/or PEFC.

Furthermore, we require our suppliers to commit not to be, directly or indirectly, involved in any of the following activities:

- Illegal logging or the trade in illegal wood or forest products (including protected and endangered species),
- Forest activities (management planning and harvesting operations), which do not comply with local, national or international legislation (including taxes, trade and customs regulations), and
- Activities connected to corruption, fraud, money laundering or conflict of interest cases.

b) Social Responsibility

We require our wood pulp suppliers to adhere to

- any of the ILO Core Conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work,
- traditional and human rights, including areas of high environmental and cultural values,
- the customary rights of indigenous peoples and communities to property, resources, territory, land tenure and management rights,
- the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples.

c) Environmental Responsibility

We require our suppliers to commit not to be, directly or indirectly, involved in any of the following activities:

- Activities where the capability of forest use exceeds a rate that can be sustained in the long term,
- Activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels and ecologically important forest areas,
- Destruction of high conservation values in forestry operations, including any conversion of primary forests,
- Deforestation and conversion of natural forests to plantations and any kind of forests to agriculture or other non-forest use after 31 December 2020,
- Degradation of other non-forest ecosystems into forest plantations,
- Introduction of genetically modified organisms and trees in forestry operation.

We furthermore require our suppliers to support the **protection of High Conservation Values (HCVs)** — areas of ecological, cultural, and social significance — and to identify, manage, and safeguard such areas.

4. Stakeholder dialogue

We are committed to meaningful stakeholder engagement and continuous collaboration with our partners to strengthen responsible sourcing practices and contribute to the long-term sustainability of forest landscapes.

We strive for open and transparent, dialogue with our stakeholders, including customers, suppliers, industry partners, non-governmental / non-profit organizations and other associations. This engagement is essential for understanding diverse perspectives, gaining valuable feedback, and building strong, trust-based relationships. This includes regular exchanges, capacity building initiatives, and ongoing updates to ensure that our stakeholders are well-informed about our requirements, progress, and challenges in our wood pulp supply chain.



5. Key Performance Indicators

We are committed to ensuring transparency and fostering open communication across all areas of our operations. This includes the regular disclosure of information related to our sourcing practices and our level of compliance with this Policy. Specifically, we report annually in our Sustainability Report on our performance against the following key performance indicators (KPIs):

- % of FSC™ and/or PEFC certified wood pulp suppliers
- % of FSC™ and/or PEFC certified wood pulp
- % of wood pulp suppliers who have signed our Supplier Code of Conduct
- % of wood pulp suppliers assessed within our Human Rights Impact Assessment
- % of wood pulp purchasers trained on sustainable procurement
- Number of violations of this Policy identified.

By providing clear and accessible reports, we aim to maintain accountability and reinforce trust among our stakeholders, ensuring that our practices not only comply with legal requirements but also align with our core values of integrity and responsibility in all aspects of our business.

6. Implementation and Compliance

To uphold this commitment, we have established a comprehensive and robust risk management and due diligence framework. This includes regular risk assessments (both internal as well as external, for example by specialized NGOs), implementing and reporting on key performance indicators (KPIs), conducting internal and external audits, and performing on-site supplier evaluations. Additionally, we require independent third-party certification of sustainable forest management practices — such as FSC™ and PEFC — and provide targeted training for employees involved in wood pulp sourcing.

Our objective is to ensure that 100% of our wood pulp suppliers sign our Supplier Code of Conduct and are included in our Annual Human Rights Impact Assessment.

If we suspect or identify that any wood pulp supplier does not comply with this Policy, we will first engage with them to encourage corrective action within an acceptable time period. Should their response and/or action remain unsatisfactory, we will ultimately discontinue the supplier relationship.

Furthermore, if at any time any non-compliant wood pulp is identified, we will promptly segregate the product for a full investigation. If non-compliance persists after the review, the product will be excluded from our value chain.

7. Policy governance

This Policy is endorsed at Board level.

Operational responsibility for implementation and compliance with this Policy and all applicable requirements lies with the Corporate Head of Procurement Fiber Materials.

8. Annual Review

This Policy, along with compliance within our own operations and across our wood pulp supply chain, is reviewed annually by the Board of Directors in collaboration with the Head of Corporate Procurement Fiber Materials and the Head of Corporate Sustainability/ESG. This review ensures effective implementation, evaluates performance, and identifies areas for improvement. Policy updates will be made as needed to reflect changing standards, risks, and business needs.

The Policy is available publicly on our website and communicated to suppliers, and, on request, also to other interested parties.



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