EUDR compliance statement

Updated October 2026

Preparedness and partnership for deforestation-free trade

The European Union Deforestation Regulation (EUDR) is designed to ensure that certain commodities and products, including relevant paper and pulp products, do not contribute to deforestation or forest degradation. It introduces due diligence requirements for businesses placing relevant products on the EU market and for certain subsequent activities.

The implementation dates are 30 December 2026 for large and medium operators and 30 June 2027 for micro and small operators.

At Premier Paper Group (PPG), encompassing Premier Paper, Premier GPMI, WBC and PPB, we remain committed to environmental responsibility and responsible sourcing. We are preparing our processes to support compliance with the EUDR and to help our customers understand and meet their applicable obligations.

We continue to comply with the applicable UK Timber Regulation (UKTR) and EU Timber Regulation (EUTR) requirements.

1. Product origins and supply chain information

Most products supplied by Premier Paper Group originate from suppliers within the EU. Our suppliers operate at different stages of the supply chain, and the information available to Premier depends on their role and the applicable EUDR requirements.

We have simplified our approach to providing EUDR information to reflect the distinction between products sourced from suppliers acting as Downstream Operators and products sourced through other supply chain arrangements.

Products sourced from Downstream Operators

Where products are sourced from suppliers acting as Downstream Operators (as is generally the case for our EU-based suppliers) and are subsequently re-imported into the EU as products within the scope of the EUDR, a conventional reference may be used where permitted under the applicable rules.

The conventional references are:

- 22EU2222222222 - for product placed on the EU market post December 31st 2026
- 99EU9999999999 - for product originally placed on the EU market prior to December 31st 2026

Where this approach is applicable, separate product-specific Due Diligence Statement (DDS) information is not required for the relevant transaction in place of the applicable conventional reference.

If required, Premier can provide supporting evidence of a supplier's position in the supply chain and its role as a Downstream Operator.

Products sourced from other suppliers

Where products are sourced from suppliers that are not acting as Downstream Operators, or from suppliers who are not based in the EU, specific DDS information may be required, depending on the product and the circumstances of the transaction. In these circumstances, it is the responsibility of the party who is deemed to be placing the goods on the EU market to obtain a DDS reference from EU Traces. Premier can help with this by requesting relevant information from its suppliers to support customers, or their customers, in obtaining the applicable DDS reference and verification information through the EU's TRACES system. Premier will not routinely collect and retain all underlying DDS information for every product as a matter of course. Information will therefore be requested from the relevant supplier when needed and where available.

2. Key updates and simplifications

The EUDR framework includes changes intended to simplify obligations for businesses.

The key points relevant to our customers include:

- **Revised application dates**: 30 December 2026 for large and medium operators and 30 June 2027 for micro and small operators.
- **Simplified downstream obligations**: Requirements for collecting, retaining and passing on DDS reference information depend on the role of the business and the applicable supply chain arrangements.
- **Conventional references**: Where the relevant conditions are met, conventional references can be used for qualifying products rather than requiring specific DDS information for the transaction.
- **Printed products**: Certain printed products, including specified books, newspapers and printed images classified under HS Chapter 49, have been removed from scope.

The precise requirements depend on the product, the transaction and the role of each business in the supply chain.

3. Our commitments

Responsible sourcing and regulatory preparedness

We continue to develop our processes to support compliance with applicable environmental and supply chain legislation and to prepare for the EUDR implementation dates.

Supply chain traceability

We maintain appropriate purchasing and supply chain records to help identify the suppliers and products concerned. Where EUDR information is required, we will work with suppliers to obtain relevant details as necessary.

Responsible sourcing standards

We recognise the importance of responsible sourcing and relevant certification schemes, including FSC® and PEFC. Such certifications form part of our wider responsible sourcing approach but do not, by themselves, replace any EUDR requirements that apply.

Support for customers

We will work with customers to clarify the information required for particular products and transactions and to provide appropriate supporting information where available.

4. What this means for our customers

- You can continue to work with Premier Paper Group as we prepare for the EUDR and its revised implementation dates.
- Where qualifying products sourced from Downstream Operators are subsequently re-imported into the EU, an applicable conventional reference may be used instead of specific DDS information, where permitted by the EUDR rules.
- Where necessary, Premier can provide evidence of a supplier's position in the supply chain and its role as a Downstream Operator.
- For other products where specific DDS information may be required, Premier can request information from the relevant supplier to support customers, or their customers, in obtaining the applicable details through EU TRACES.
- Premier will not routinely hold DDS information for products we supply. Information may need to be requested from the supplier when a specific requirement arises.
- The EUDR requirements applicable to individual products will depend on their classification, the circumstances of the transaction and the role of the businesses involved.

Our teams remain available to help customers understand their information requirements and to support appropriate supply chain transparency.

Together, we continue to build responsible and transparent supply chains.

If you have any questions or require further support, please contact your usual Premier Paper Group representative.

October 2026