

Altavilla Vicentina, July 25th, 2025

Burgo Group – Compliance with the European Deforestation Regulation (EUDR) – Update – July 2025

Introduction

This document provides an update on Burgo Group's and Mosaico's preparations to ensure compliance with the European Union Deforestation Regulation (EUDR), formally designated as (EU) No. 2023/1115. The regulation is set to **come into force on December 30, 2025**.

Activities concerning our internal systems and processes are effectively progressing to ensure full compliance with the EU Deforestation Regulation (EUDR) by the aforementioned deadline.

Overview of Burgo Group's EUDR Preparedness

Preparation efforts have continued with:

- **Gathering crucial supply chain data**, including geo-localization data of land plots where raw materials originate, supplier information, and harvesting timelines.
- **Assessing the risk of deforestation and forest degradation** within the supply chain.
- **Preparing Due Diligence Declarations (DDD's)**.

As previously mentioned in our earlier communication, we have completed the acquisition of the **Osapiens platform**, which will enable us to automate the due diligence process required by the Regulation. The Osapiens HUB for EUDR offers comprehensive functionalities to ensure 100% compliance with the EU Deforestation Regulation (EUDR). It reduces workload through a user-friendly design that requires minimal manual intervention. This platform will also guarantee integrated submission of DDDs to the EU Traces system, automated supplier onboarding, and the construction of a transparent and traceable supply chain through material flow monitoring and early risk detection.

We are currently engaged in the implementation of the Osapiens system, which will undergo testing during the autumn and become fully operational **by the end of November 2025**. This will enable us to meet all the information requirements set out by the regulation, including the provision of “reference numbers” and “verification numbers” on the accompanying documents for paper products (invoices).

Through Osapiens, we will offer our customers a **free and user-friendly portal** that provides structured and secure access to all relevant EUDR-related information. The portal is designed to integrate with existing corporate information systems, facilitating the automatic retrieval of data such as due diligence statements and verification numbers, thereby reducing operational burden and ensuring an efficient flow of information.

Further technical details will be shared shortly, in parallel with the progress of the project. For any clarification or specific needs, please contact your sales representative.

EUDR Data Requirements During the Transition Period

Please note that products delivered during this period are placed on the market during the transition phase and are not yet subject to EUDR requirements.

Burgo Group's current Due Diligence system will be extended to cover the requirements stipulated by the EUDR, particularly those outlined in Articles 8 (Due Diligence) and 9 (Information Requirements) of the regulation.

The information reported by Burgo Group's Due Diligence system is important for our customers and should guarantee that their supplier's Due Diligence measures meet EUDR requirements.

Throughout the year, we will provide all our customers with EUDR-relevant information on the evolution of our due diligence system. The format, scope, and extent of reporting are expected to change once the country risk assessment by the EU Commission is completed during 2025.

Monitoring Regulatory Updates

Burgo Group continuously monitors regulatory developments and implementing acts of the EUDR to ensure full compliance and integrate the requirements into its governance procedures.

Since our last update, no new regulatory developments have been reported beyond those already mentioned in the previous communication:

- The European Commission published updated Guidelines and a new FAQ section on the application of Regulation (EU) 2023/1115 against deforestation on April 15, 2025. The

new guidelines provide numerous practical cases and examples for correct application. The guidelines are available here:

https://environment.ec.europa.eu/document/5dc7aa19-e58f-42a3-bbbe-f0eb2e5a1d3a_en

- The European Commission published Implementing Regulation (EU) 2025/1093 on May 22, 2025, which establishes the list of low and high deforestation risk countries for the EU Deforestation Regulation (EUDR). This implementing regulation is based on the methodology approved in October 2024. The Implementing Regulation will be published shortly in the Official Journal of the EU and will enter into force three days after publication. It should be noted that Burgo Group does not source from countries classified as high risk, but exclusively from low or standard risk countries.

Contact Us for Any Questions or Concerns

Burgo Group will continue to keep you updated on the progress in adapting its processes to meet EUDR information requirements.

Please do not hesitate to contact us for further information.

A handwritten signature in blue ink, reading "Carlotta Priola".

Carlotta Priola
Sustainability Manager

A handwritten signature in blue ink, reading "Valerio Forti".

Valerio Forti
Group HSE, Sustainability, Integrated
Management System Director