

Regarding the EU Deforestation Regulation

The EU Deforestation Regulation (EUDR) is an important initiative to combat deforestation and forest degradation – an initiative the Holmen-group fully supports. Under the EUDR, relevant commodities and products may not be placed on the EU market or exported from the EU, unless they are deforestation-free, produced in accordance with the relevant legislation of the country of production, and covered by a due diligence statement.

Holmen (meaning both the Holmen Group as a whole and the various business areas within the group) has had sustainable forestry practices and well-established traceability processes in place for a long time, which serves as a solid foundation for compliance with the EUDR. Holmen continues to refine these processes to ensure robust traceability and to achieve compliance with the EUDR in the smoothest way possible – both for Holmen and Holmen's business relations.

Deforestation-free, traceability and geolocation data

The requirement "deforestation-free" makes traceability to the plot of land necessary. Accordingly, the EUDR requires operators to collect geolocation data of the area where wood is harvested and make this data available to Competent Authorities before placing wood onto the EU market for the first time. As an operator, Holmen will fulfil this obligation by providing geolocation data into the EUDR Information System (the "System").

It should be noted that the EUDR, as clarified in the FAQ (frequently asked questions) updated in April 2025, does not require downstream operators themselves to access geolocation data to be compliant with the EUDR. Instead, as stated in the FAQ, they may rely on their supplier's due diligence statements, reference numbers and verification numbers; provided that relevant geolocation data have already been submitted to the System and that the downstream operators have ascertained that their suppliers have robust due diligence systems in place.

Access to information

When being subject to the EUDR, Holmen will submit due diligence statements to the System, which once submitted will generate reference and verification numbers. Such statements must be supported by operational and up-to-date due diligence systems. Holmen will have governance documents, controls and procedures in place to ensure adequate steps of collecting information, performing risk assessments and developing risk mitigation plans are carried out.

Since the System only will contain reference and verification numbers, Holmen's supplemental due diligence information including governance documents, certificates and other descriptive documentation will be made available in other ways.

As regards the requirement for due diligence, the EU Commission has now published its country risk assessment which impacts the level of due diligence that needs to be carried out.

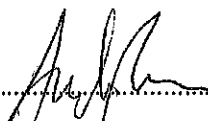
Holmen's business relations, in their roles as downstream operators, will be provided with reference and verification numbers for each delivery. Access to reference and verification numbers will be possible by various alternatives, such as included on delivery notes, receiving EDI-messages or through a Portal.

Holmen's implementation status and key dates 2025¹⁾

As a gradual upscaling of implementation, Holmen has been submitting due diligence statements to the test version of the System²⁾. These initial due diligence statements have been based on raw material information within Holmen's control – that is, wood harvested by Holmen Forest. Currently, suppliers outside Holmen are also being onboarded and integrated into the Holmen IT platform.

Please note the following key dates for Holmen's implementation (with reservation for differences between the different business areas):

- From July, Holmen will be able to provide customers with delivery data including reference number and verification number from the test version of the System.
- From mid-September, Holmen will begin submitting due diligence statements to the System based on raw material information from both Holmen-internal supply chains and external suppliers.
- During Q3/Q4, Holmen will escalate the onboarding of suppliers outside Holmen, to be able to submit due diligence statements to the System and to include reference and verification number in the delivery data.


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This information accounts for Holmen's current assessments and working approach regarding the EUDR, it is subject to any appropriate adjustments that may be incited by decisions, updated guidance, practical developments or other additional information from EU or national authorities. This information is provided for informational purposes only and do not constitute declaration, commitment or advice.

¹⁾ Operations in UK (meaning production of Incada at the Workington mill) will meet compliance requirements before the EUDR enters into application but has a different timetable as a non-EU production site. Further guidance from the EU Commission is required and updates will be communicated as soon as possible.

²⁾ The Acceptance environment, a replica training platform of the EUDR Information System.