



On behalf of MM Board & Paper

MM Group's approach to EUDR compliance

Dear customer,

The MM Group is committed to sustainable forestry practices and actively supports global efforts to combat deforestation and forest degradation. In line with this commitment, we will be fully compliant with **Regulation (EU) 2023/1115 (EUDR)**, which will become applicable on **30 December 2025**, taking into account the **EUTR transition period**.

MM Group's EUDR readiness – key milestones:

- Key preparations are complete: EUDR processes have been defined and are supported by the Osapiens Due Diligence Hub, which will be used for EUDR data collection, transmission, and risk assessment.
- From 30 December 2025, Due Diligence Statement (DDS) submission will begin for applicable wood-based products.
- The EUDR Reference and Verification numbers will be provided on order confirmations and delivery notes.

Details of the MM Group's approach to EUDR risk assessment and the data exchange are presented in the **attached PowerPoint presentation** and additional information can be found also on our [EUDR website](#).

We are also pleased to invite you to our **webinar**, "MM Group's Path to EUDR Compliance". During this session, we will share practical insights into our approach and explain the key steps we are taking towards compliance.

You can find more details and register here: [LINK](#)

If you have any questions or need more information, please contact your **Key Account Manager**.

We are committed to working closely with our suppliers and customers to achieve a deforestation-free supply chain, and we value your cooperation.





MM EUDR compliance – MM risk assessment

MM Group – July 2025





MM commitment to responsible sourcing



At MM Group we believe in responsible sourcing and support the EUDR as an important step in ensuring that companies are held accountable for their impact on the environment and society.

We take our responsibility to minimise our environmental impact seriously and go beyond the legal requirements.

We prioritise renewable raw materials, responsible resource use and decarbonisation activities.

MM EUDR compliance

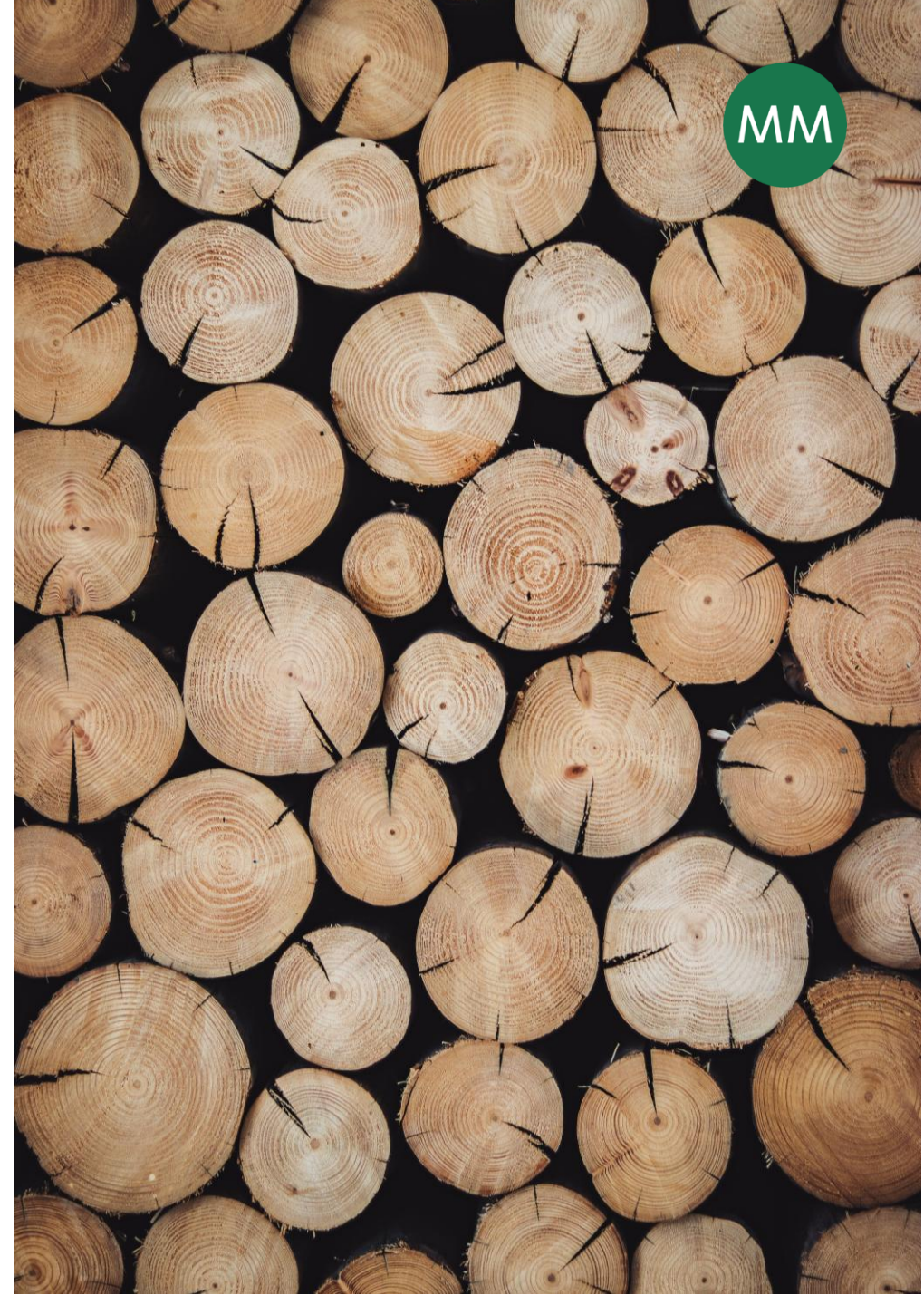
Steps MM fulfils to ensure compliance

- Due diligence process for purchased wood and wood products
- Ensuring traceability
- Risk assessment based on specific country risk
- Risk mitigation
- Submitting DDS* and receiving the RN**
- Sharing RN** with customers in scope

Completion of these steps enables EUDR information to be shared for MM products throughout the value chain.

*DDS – Due Diligence Statement

**RN – Reference Number



Due diligence process at MM



The due diligence process for fibre-based materials has been in place at MMBP for several years and based on country specific risk assessment.



At MMBP, 100% of wood and wood-based materials came from certified or controlled sources already since 2024.



MM accepts only deforestation-free goods



Compliance tool for conducting EUDR Supplier assessment and questionnaires and to manage information traceability



MM EUDR country risk assessment will be based on EU country benchmark and known chain of custody country benchmark.

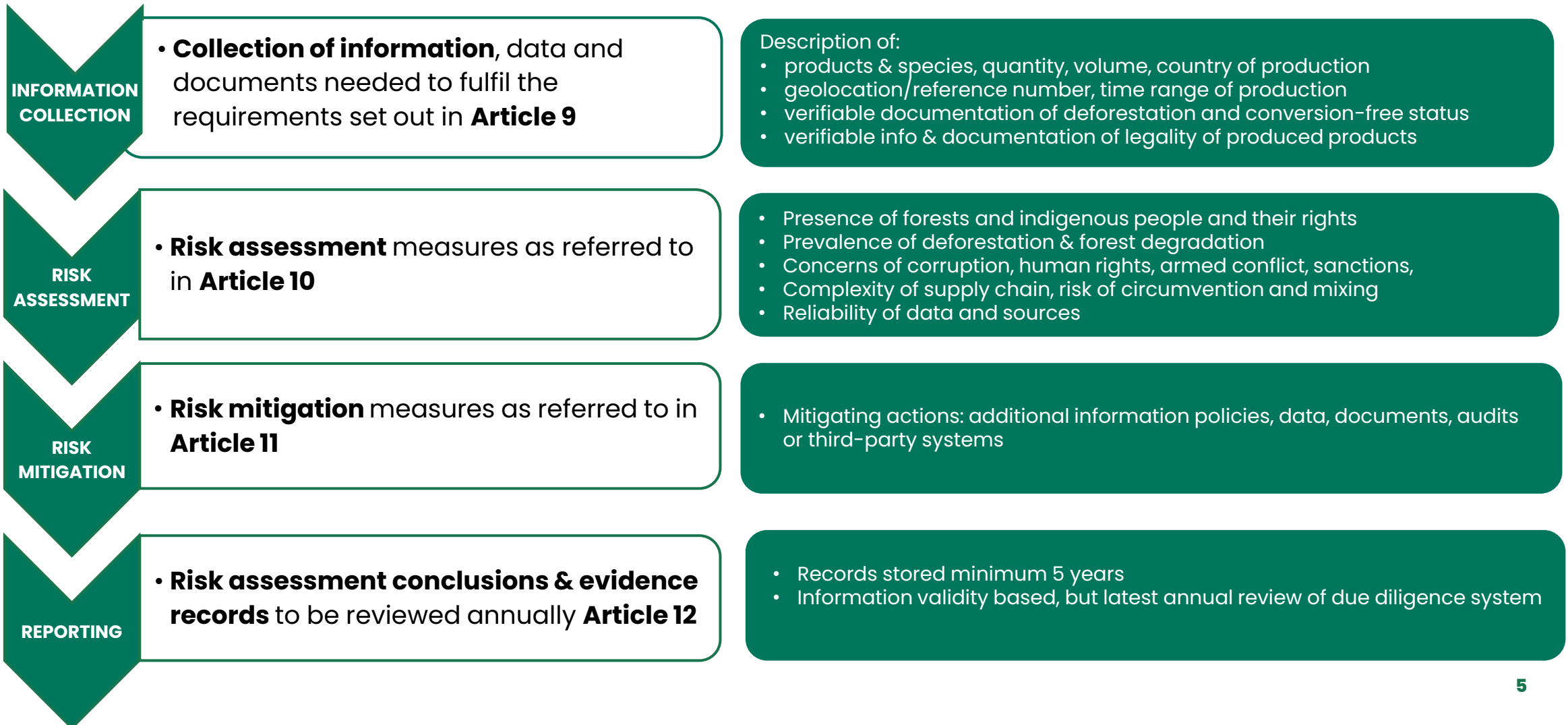


Chain of Custody (CoC) certification provides us additional proof that traceable origin, legality and sustainability are realised throughout the wood supply chain and is verified by third parties.

EUDR risk assessment

Part of the due diligence package

MM



MM country risk assessment

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The **MM Country risk assessment** compiles information from public sources on the operating environment of the country under review, taking into account the regulatory requirements of each wood sourcing country.

On the **country specific risk assessment** we evaluate the following:

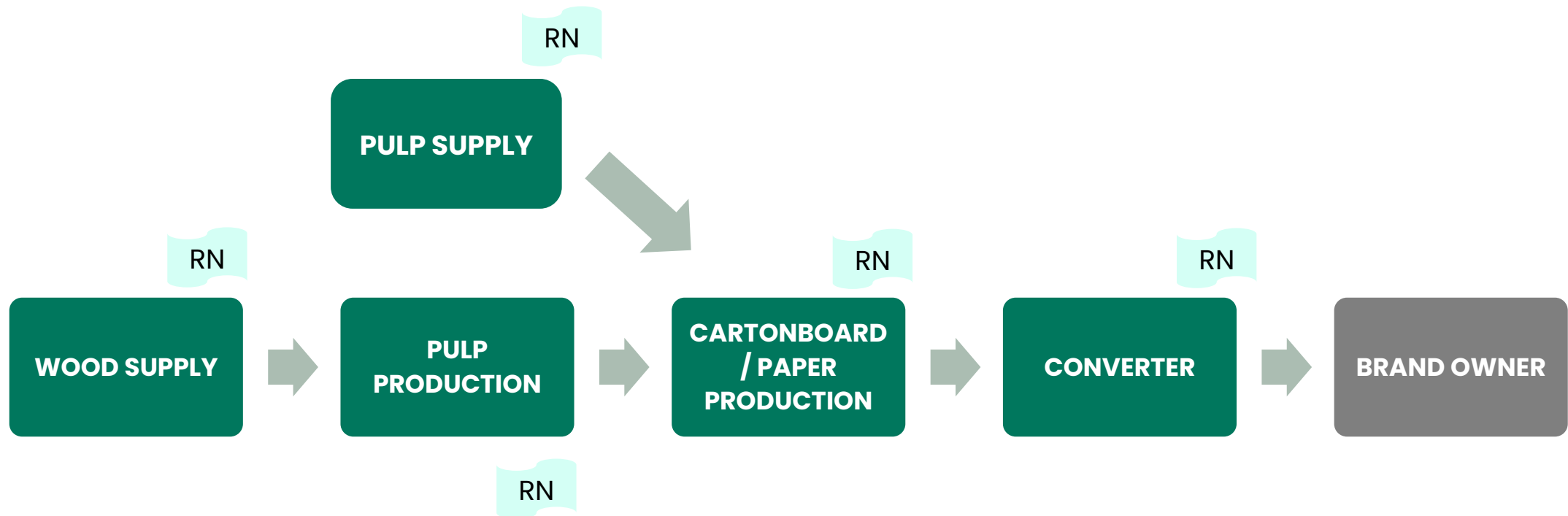
- Environmental risks
- Supply chain risks
- Human rights risks (including indigenous people)
- Corruption, bribery, conflicts, sanctions and other concerns
- Legality

THIS SYSTEM COMBINES:



Information transfer

- EUDR requires each EU operator in the wood value chain to **submit a Due Diligence (DD)** statement to the EU's Traces system.
- The Traces system **provides reference (RN) and (VN) verification numbers** referring to the submitted DD statement, which are passed on to the next operator in the value chain.
- The reference and verification numbers confirm the validity of each operator's DD declaration.

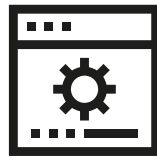


ONLY IF PULP IS TO BE PLACED ON THE MARKET AS
A STAND-ALONE PRODUCT.

Delivery of reference numbers for MM Board & Paper

MM

For customers within the scope of the EUDR



Customers will receive Reference and Verification numbers (RN and VN) via delivery documentation – order confirmation, delivery note, including geolocation in case customer places product for the first time into the EU market

RN and VN can also be sent electronically via EDI, if the customer already has an EDI connection

One delivery may consist of several RNs or in case of import, data sets, or the same RN may be in several shipments – sent at the latest when the customer's shipment is dispatched from MM's facilities

Information on policies and certificates

Links

- <https://mm.group/sustainability-eudr/>
- <https://mm.group/certificates/>





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