

## Commitment of top management to implement and maintain the PEFC CoC requirements

The management of Smurfit Kappa Roermond Papier confirms the commitment to implement and maintain the Chain of Custody (CoC) requirements in accordance with the PEFC Chain of Custody standard **PEFC ST 2002:2020**.

The organisation's commitment is made available to the organisation's personnel, suppliers, customers, and other interested parties on the web page:

<https://www.smurfitkappa.com/nl/locations/netherlands/smurfit-kappa-roermond-papier>

The company states that it is not using any wood that originates from controversial sources, according underneath listed criteria's, in PEFC certified products or PEFC controlled sources.

### Controversial sources:

#### Forest and tree based material sourced from:


- a) Activities not complying with applicable local, national or international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anticorruption and the payment of applicable royalties and taxes.
- b) Activities where the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis is not maintained or harvesting levels exceed a rate that can be sustained in the long term.
- c) Activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels.
- d) Activities where ecologically important forest areas are not identified, protected, conserved or set aside.
- e) Activities where forest conversions occur, in other than justified circumstances where the conversion:
  - i. is in compliance with national and regional policy and legislation applicable for land use and forest management, and
  - ii. does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas, and
  - iii. does not destroy areas of significantly high carbon stock, and
  - iv. makes a contribution to long-term conservation, economic, and/or social benefits.
- f) Activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not met.
- g) Activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met.
- h) Conflict timber.
- i) Genetically modified trees.

The company has implemented a **PEFC due diligence system** for purchasing wood based raw materials, which are used in PEFC product groups, if an PEFC certified or PEFC controlled source will be sold.

Due Diligence System (DDS): Framework of procedures and measures, namely information gathering, risk assessment and risk mitigation, to exercise due diligence.

The organisation demonstrates its commitment to comply with the social, health and safety requirements defined in the standard **PEFC ST 2002:2020 chapter 4.10**.

Roermond, 7-4-2021  
(location, date)

*W. Log*  
  
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(Signature & Name of the Managing Director or CEO of the entity)