

THREE PILLAR APPROACH TO EUDR INFORMATION SHARING

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TRUSTED SUPPLIER DATA & RISK ASSESSMENT

- We receive EUDR-relevant information directly from our pulp suppliers, including Due Diligence Statements (DDS), geolocation data (where available), and universal DDS references.
- Our team conducts annual supplier risk assessments, evaluating compliance, documentation reliability, and supply chain integrity.

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INTELLIGENT INTERPRETATION & DOCUMENTATION

- James Cropper interprets and validates supplier data, ensuring it meets EUDR requirements.
- EUDR documentation is prepared for each consignment, including commercial invoices, DDS, geolocation (if available), HS codes, and Taric codes.
- Our process integrates EUDR data into our ERP and order management systems, supporting full traceability.

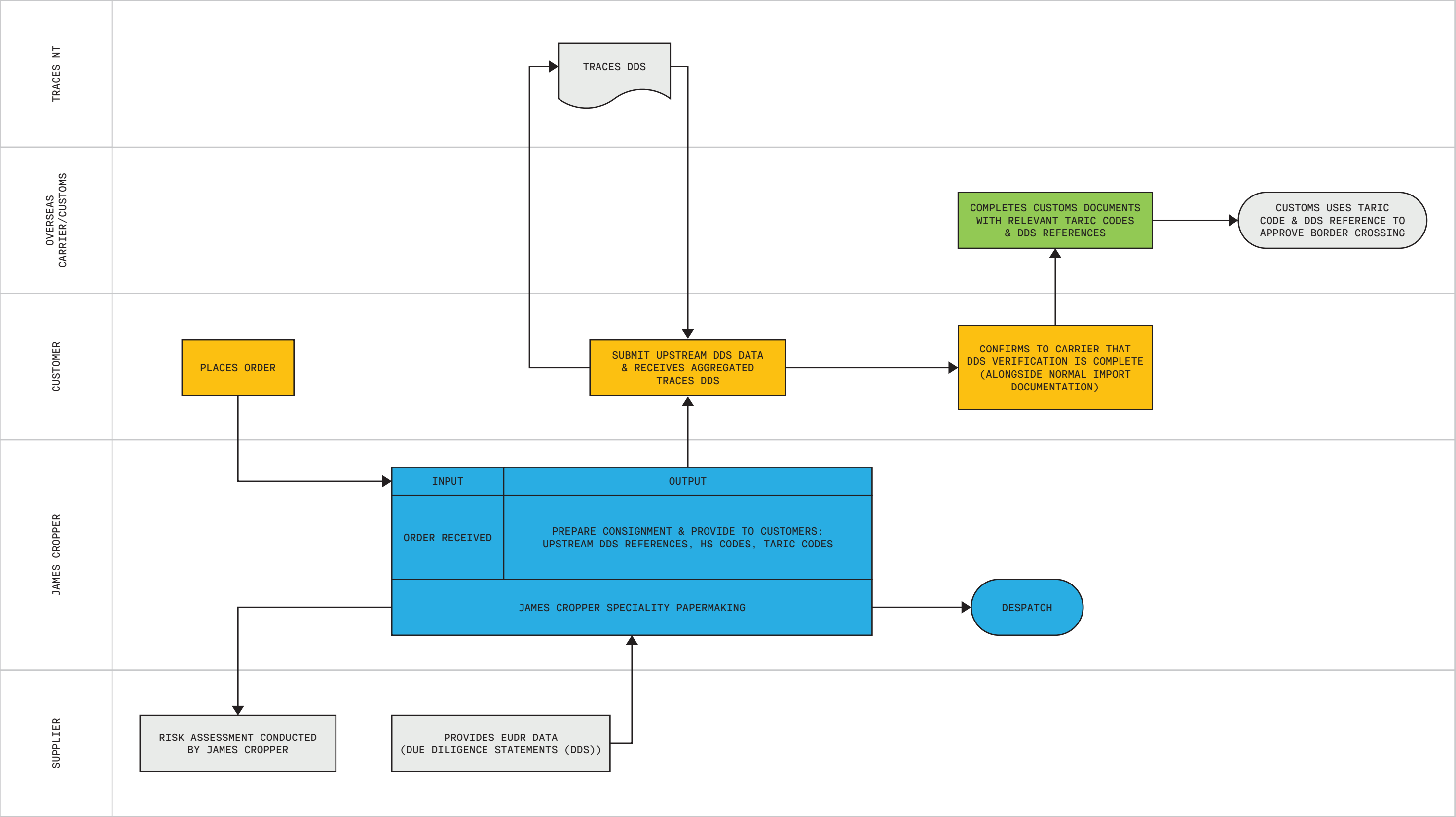
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SEAMLESS CUSTOMER INTEGRATION & COMPLIANCE

- The process begins with the customer's purchase order, followed by sales order creation, paper manufacturing, and consignment preparation.
- Customers receive EUDR documentation and data alongside their invoice.
- For DAP shipments, Customers upload documentation to TRACES and confirm DDS verification to their freight forwarder, alongside standard import paperwork.
- Our logistics partner completes customs documentation and submits to authorities.

EUDR DATA PROCESS MAP

Traceability and transfer of EUDR data from receipt to despatch



FREQUENTLY ASKED QUESTIONS

Is James Cropper working towards the December 2025 EUDR implementation date?

We are fully committed to meeting the EUDR implementation date. Our dedicated team is driving progress, supported by robust software and enhanced ERP systems to ensure complete traceability of EUDR-relevant materials. We are here to support our customers with compliant documentation every step of the way.

How does James Cropper approach risk assessments under EUDR?

We will take a rigorous, two-tiered approach to risk assessment using the Osapiens platform:

Delivery-Level Assessment

- Every pulp delivery is reviewed to confirm:
 - A valid Due Diligence Statement (DDS) from the supplier
 - Legal harvesting and deforestation-free status
 - Documented country of harvest
 - Any missing geolocation data is transparently noted and mitigated through batch-level traceability

This ensures every batch of paper we produce is traceable and compliant.

Supplier-Level Assessment

- We assess suppliers for compliance risk, focusing on:
 - Indigenous rights and land claims
 - Deforestation and degradation risks
 - Reliability of documentation and supply chain traceability
 - Country-level concerns (e.g. corruption or conflict)
 - Risk of mixing materials from unknown or non-compliant sources
 - Past non-compliance and third-party certification status

This approach helps us maintain a trusted supply chain and provide robust documentation for products placed on the EU market.

Will James Cropper provide geolocation data for pulp used in products?

Current regulations do not require upstream suppliers to share geolocation data, as clarified in the Deforestation Regulation FAQ (April 2025, 7.15, pg. 66). We do not routinely receive geolocation data and cannot guarantee its availability downstream. We expect to receive DDS Reference Numbers and Verification Codes from our suppliers and will pass these on to our customers.

Will James Cropper provide Due Diligence Statements (DDS) for each product?

For every order containing virgin pulp, we will supply the relevant DDS verification and reference numbers for the pulp(s) used in your product. These numbers are provided by our pulp suppliers.

Will James Cropper submit data to the EU TRACES system?

As a non-EU operator, James Cropper does not submit data to TRACES.

Can customers test their due diligence system with James Cropper's?

While we are focused on strengthening our internal processes, we are currently unable to conduct end-to-end testing with individual customer systems.

How will James Cropper provide EUDR data?

Please refer to the attached process map (page 2) for details.

If you have further questions, our team is here to help. Please contact your customer service representative in the first instance. Together, we are making a material difference, ensuring compliance, transparency, and partnership for a sustainable future. This document will be reviewed and updated on a regular basis, when changes are made, we will advise you.

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