

JAMES CROPPER

Dear Valued Customer,

As the EU Deforestation Regulation (EUDR) approaches its application date of 30 December 2026, following the European Commission's recent simplification measures, we recognise the importance of providing our customers with clear information regarding James Cropper's position within the supply chain and the support we can provide.

As a UK-based manufacturer, James Cropper will not be classified as an EU Operator under the EUDR. We source wood pulp exclusively from established EU-based suppliers and maintain robust supplier assurance processes that support responsible sourcing, traceability, and regulatory compliance throughout our supply chain.

We remain committed to working closely with our customers and suppliers to promote transparency and to provide relevant sourcing information appropriate to our role within the EUDR framework. While each organisation is responsible for assessing its own obligations under the Regulation, we will continue to support our customers by sharing available information relating to our products, fibre sourcing, and supplier assurance activities.

To assist with understanding our position, we have provided a series of Frequently Asked Questions below, together with a supply chain map illustrating where James Cropper sits within the EUDR value chain and the flow of information between upstream suppliers and downstream customers.

Paul Barber
Managing Director
James Cropper Paper & Packaging

MAKING A MATERIAL DIFFERENCE

Burnside Mills,
Kendal, Cumbria,
LA9 6PZ, United Kingdom

JamesCropperSpecialityPapers Ltd. Registered in England: No.04690555.
James Cropper Converting Ltd. Registered in England: No. 04690526.
Registered Offices as above.

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FREQUENTLY ASKED QUESTIONS

1. What role does James Cropper have in the EUDR supply chain?

- James Cropper is a non-EU manufacturer and therefore cannot be considered an EU Operator or First Downstream Operator under the EUDR.
- James Cropper sources wood pulp exclusively from EU entities, predominantly First or subsequent Downstream Operators. As a result, the relevant products used in the manufacture of our paper have already been subject to due diligence upstream.
- Where appropriate, James Cropper will provide relevant information relating to its products.

2. What role will my company have when purchasing or importing James Cropper products?

- Customers should assess their own obligations under the EUDR based on their specific business activities and role in the supply chain. James Cropper does not provide legal advice or consultancy relating to EUDR compliance.
- Customers should seek guidance from the European Commission, relevant authorities, or independent advisers when determining how the regulation applies to their business.
- Please refer to the European Commission's EUDR Implementation FAQs (V5, Section 5.4) regarding the re-importation of goods into the EU and the Green Forum website for additional guidance on EUDR implementation.

3. Will James Cropper submit a Due Diligence Statement (DDS) and provide DDS reference numbers?

- No. As a non-EU manufacturer, James Cropper does not submit Due Diligence Statements to the EU TRACES Information System and therefore does not generate DDS Reference Numbers (RN) or Verification Numbers (VN).
- An exception applies for one pulp source where James Cropper's supplier acts as the Operator rather than a First or subsequent Downstream Operator. In this case, James Cropper will provide the relevant DDS Reference Number and Verification Number to the customer responsible for the first placement of the goods on the EU market. The customer should retain this information in accordance with the Regulation.

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4. What EUDR information can James Cropper provide to support my compliance obligations?

- James Cropper can provide product information, fibre source declarations, and information relating to our supplier assurance and due diligence processes. We can also provide information regarding the third-party certification status of our pulp suppliers.
- Please note that geolocation data and upstream Due Diligence Statements are submitted to the EU Information System by the relevant Operators and are not held by James Cropper.

5. Can James Cropper provide forest plot geolocation data, GeoJSON files, or deforestation dates for paper products?

- No. James Cropper does not harvest or manufacture the raw forest commodity from which this information originates.
- Geolocation data and related information are submitted upstream to the EU Information System by the relevant Operators and are not shared with James Cropper. Consequently, James Cropper cannot provide this information downstream.

6. How does James Cropper demonstrate that its products meet EUDR requirements?

- James Cropper sources pulp exclusively from EU-based suppliers and operates a supplier assurance programme that includes annual fibre declarations, traceability checks, and reviews of supplier compliance information. We source only from suppliers holding recognised third-party forest certification.
- Geolocation data and Due Diligence Statements relating to the pulp are submitted upstream by the relevant Operators before the material is supplied to James Cropper.
- In addition, James Cropper conducts annual fibre sourcing risk assessments in accordance with PEFC requirements and applicable regulatory frameworks, including the EUDR, UKTR and other relevant fibre sourcing requirements.

7. How does EUDR apply to products containing recycled fibre?

- Products manufactured using 100% recovered fibre are exempt from EUDR requirements and will be supplied with the relevant TARIC code (Y133).

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8. What should I do if my customer requests geolocation data, DDS reference numbers, or other EUDR information?

- Geolocation data relating to the pulp used in James Cropper products is submitted to the EU Information System by the relevant Operator and is not held or provided by James Cropper.
- Where applicable, James Cropper can provide EUDR-related information relevant to its position within the supply chain, including DDS reference information where this is available and required.
- Suppliers acting as First or subsequent Downstream Operators do not generally share DDS Reference Numbers or Verification Numbers with James Cropper, as these are retained by the relevant operator within the supply chain in accordance with EUDR requirements.

9. Does James Cropper submit geolocation data to the EU Information System?

- No. As a non-EU entity, James Cropper does not submit geolocation data or Due Diligence Statements to the EU Information System.
- In addition, James Cropper does not directly source or harvest raw forest commodities. All wood-based raw materials supplied to James Cropper originate from EU entities and have been subject to due diligence upstream in accordance with EUDR requirements.

10. Will James Cropper be using an EUDR IT system?

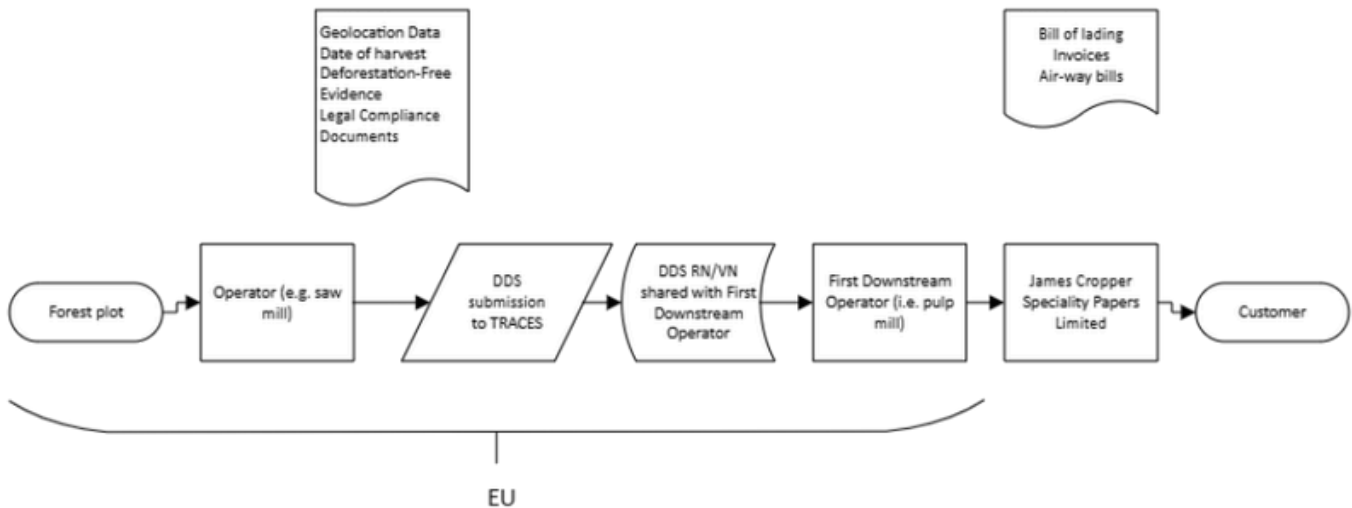
- James Cropper has not yet confirmed whether a dedicated IT system will be used specifically for EUDR-related information management.
- Regardless of any future system developments, James Cropper operates a standard process for sharing relevant information with customers and does not require an integrated customer IT platform to do so.

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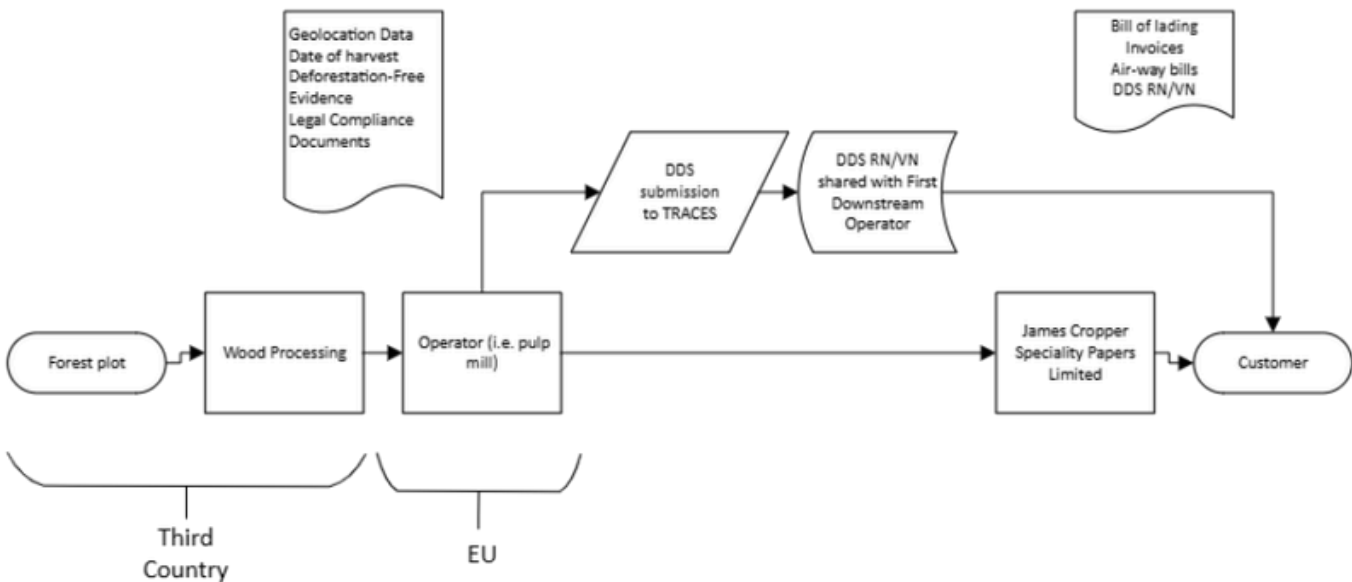
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JAMES CROPPER SUPPLY CHAIN SCENARIOS

SCENARIO 1 – SOURCING FROM FIRST DOWNSTREAM OPERATORS



SCENARIO 2 – SOURCING FROM OPERATORS



*DDS – Due Diligence Statement

**RN/VN – Reference and Verification Number

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