

Group Directive - Sustainable forestry

1. Introduction and Purpose

This Group Directive ("Directive") is related to, and aligned with, the Operations and Quality Policy as well as the Sustainability Policy. The Directive presents mandatory principles and describes how the supervisory Group Policies are applied in detail.

This Directive has additional processes and guidelines, which each and one describes Billerud sustainable forest management.

Billerud Wood Supply Sweden is continually improving the business operations, in regards to quality and environmental concerns, in order to meet the expectations of our partners and the general society. In that way we create profitability and sustainable growth.

Billerud is working with the forest certification standards FSC® (FSC-C004906) and PEFC (PEFC/05-33-114), to show our customers and the society an independent acknowledgment on Billerud sustainable forestry.

Raw materials from sustainably managed forests serve as the key component needed to replace finite resources with renewable materials, to move towards a circular, sustainable society. To ensure that forests can provide this in the long-term and with preserved biodiversity, we need to manage and use them responsibly.

2. Scope and Applicability

This Directive only applies to Billeruds European operations and purchase. This Directive applies to all relevant people working for Billerud or on Billerud' behalf, including board members, employees, interns, and contractors "Representatives").

All Billerud representatives are individually responsible for reading, understanding and following this Directive. The owner of this Directive is responsible for communicating and implement the Directive.

3. Billerud Forestry

Billerud forestry is based on:

- Long-term and sustainable timber yield of high quality
- Valuable natural environments are protected and all naturally occurring plants and animals are given the conditions to be able to survive in the forest landscape



- Water quality and the biological values of the water are preserved
- Historically valuable cultural environments are preserved
- Protecting people's jobs and recreational opportunities from social consequences of biodiversity related impact.

Billerud environmental work is based on current laws and regulations, the Swedish forest industry's own set requirements and requirements from independent certification systems.

- I. Managers within the Wood Supply department have the overall responsibility for environmental and quality work. The competence of all employees must mean that they feel committed and can take personal environmental and quality responsibility in their daily work.
- II. To further develop forestry, Billerud will actively initiate and participate in development projects. Billerud shall be open with information and conduct a constructive dialogue with all stakeholders.

Billerud owns forests in Sweden and conducts forest management activities on sites in Sweden and in Latvia. Some of the sites that Billerud owns, and some of the sites where Billerud conducts forestry management activities, are located near biodiversity sensitive areas (Natura 2000, Key Biodiversity Areas ('KBAs'), Nature reserves and National Parks). Billerud does not, however, have any operations in those biodiversity sensitive areas. In addition, as Billerud does not have any operations in those biodiversity sensitive areas, none of its operations leads to Billerud negatively impacting the natural habitats or disturb species for which the protected areas have been designated to protect. Billerud does conduct activities in "UNESCO Biosphere reserves" which also are defined as "other protected areas" (as referred to in Appendix D of Annex II to Commission Delegation Regulation (EU) 2021/2139 (8)). These areas are not formally protected or stand under any restrictions or regulations in Sweden.

As Billerud sometimes operates in locations near or in biodiversity sensitive areas, Billerud applies biodiversity mitigation measures. This includes examples such as nature value assessment, establishing buffer zones and conducting consultations with authorities when working near or in biodiversity sensitive areas.

3.1 Forestry management

Billerud forest management includes several forestry measures, such as:

- Silviculture
- Harvesting
- Road construction and maintenance



- Harvesting and extracting forest fuels
- Fertilization

Applicable laws and regulations, the Swedish forest industry's own set requirements and requirements from independent certification systems are summarized in Billerud' Guides, instructions and guidelines. A well-executed planning, described in the Planning Guide, is a absolute prerequisite for the different forestry measures to be carried out in the best way.

All forestry measures are performed by certified contractors who report back all activities in terms of quality, environment and health and safety reguriements. Each department is responsible for Supplier assessment and follow-up of contractors.

Billerud plans and harvests standing forest on its own land, for larger limited companies and for individual small forest holders.

Harvesting is primarily carried out in accordance with Billerud' Level of Consideration, which means that the current certification requirements and the Swedish Forest Agency's target images are met. On certified properties, felling is always carried out according to Billerud' Level of Consideration.

When felling on uncertified forest owners' properties, the Billerud Level of Consideration is always sought. If the forest owner has other wishes, an appropriate level of consideration is discussed based on the conditions of the area and the forest owner's wishes. Billerud always harvests in accordance with the Swedish forest act and other applicable legislation.

3.2 Training

In order to ensure compliance with this directive and Billerud Wood Supply's operational goals, new employees are introduced and continuous training takes place. Knowledge and instructions are gathered in Billerud Manuals and within the web-based tool "Skötselskolan / Forestry School".

Through internal audit and our own business follow-up, Billerud verify that we meet business goals and Guidelines. External audits, by third part, also verify that requirements are met in Billerud operations.

3.4 No deforestation commitment

Since 1997, Billerud has been actively involved towards creating sustainable supply chains that ensure responsible use of forests, including measures to prevent deforestation in natural forests and plantations.

The base for sustainable forestry in own and managed operations is always zero deforestation¹

¹ In line with national legislation in Sweden and Latvia.

3.5 Sustainable Forestry and Traceability

Billerud has systems in place to trace the origin of wood used in our products to ensure that it originates from responsible and non-controversial sources. All fiber entering Billerud production is either delivered as certified wood, controlled wood or is subject to Billerud's due diligence system.

4. Non-compliance and reporting

Billerud's Representatives are encouraged to report breaches (including suspected breaches) of the Directive to their immediate manager, their local HR Business Partner or to the Group's General Counsel or Corporate Compliance Manager. Anonymous reporting can be made through Billerud Confidential Reporting System (Speak-Up Line).

Any participation in a violation of this Directive or applicable law may be grounds for disciplinary and/or legal action. If you have questions or feedback on the Directive, please contact the Directive Owner or the Group's Corporate Compliance Manager.

