

WOOD ORIGIN DECLARATION

Mill name:	Sappi Rockwell Solutions Limited
Location:	Wester Gourdie Industrial Estate, Brunel Road, Dundee, DD2 4TG, United Kingdom
Reporting period:	1 January 2023 to 31 December 2023
Date of issue:	19 April 2024

Product group covered by this declaration: Coated Flexible Packaging

Scope: This declaration covers all wood-based raw material assortments (roundwood, chips, pulp), countries of harvest and tree species that may have been used in the production of the product groups covered by this statement. The mill uses only fresh wood-based raw materials.

WOODFIBRE SOURCING AND DUE DILIGENCE

- The mill is certified against BRCGS Packaging Materials (Issue 6: Aug 2019), FSC® (SGSCH-COC/CW-003171; FSC® C015022), and PEFC (SGSCH-PEFC-COC-000387; PEFC/07-32-76) Chain of Custody standards.
- All woodfibre procurement is in accordance with the commitments and ambitions stated in the Sappi Group Woodfibre Procurement Policy¹.
- All of Sappi Europe's woodfibre suppliers are Chain of Custody certified. The full coverage of the certified CoC systems means that all forest-based raw material is traceable to its origin.
- All supplies of woodfibre are subject to Sappi's due diligence procedure, a system of measures and procedures to minimize the risk of sourcing material from unacceptable/controversial sources in accordance with the FSC Controlled Wood Standard, as well as the PEFC CoC standard's risk-based due diligence system.
- Sappi exclusively procures woodfibre raw material which meets at least the requirements of FSC Controlled Wood as well as PEFC and SFI (where applicable) Due Diligence System (DDS) requirements.
- Sappi's due diligence procedure complies with the requirements of the EU Timber Regulation (EUTR-Regulation (EU) No 995/2010)², and also with the US Lacey Act, Australian Illegal Logging Prohibition Act, and UK Timber and Timber Products Placing on the Market Regulations (UKTR).
- Tree species identified as endangered by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) are neither utilized nor imported.
- The European Union Deforestation Regulation (EUDR) will enter into application on 30 December 2024. Sappi is committed to implement the EUDR into our operations and to ensure timely delivery of all the information required along the supply chain.
- All certificates and relevant statements are available at <https://www.sappi.com/sustainability-certifications>.

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¹ <http://www.sappi.com/groupwoodfibrepronementpolicy>

² <https://www.sappi.com/files/eutr-compliance-statement-seu-grouppdf>

COUNTRY	REGIONS	COUNTRY SHARE	TREE SPECIES
Germany	Whole country	58.30%	Alder (<i>Alnus glutinosa</i>), Ash (<i>Fraxinus excelsior</i> L.), Beech (<i>Fagus sylvatica</i> L.), Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus nigra</i> , <i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Uruguay	Canelones, Cerro Largo, Colonia, Durazno, Flores, Florida, Lavalleja, Maldonado, Río Negro, Rocha, San José, Soriano, Tacuarembó, Treinta y Tres	14.07%	Eucalyptus (<i>Eucalyptus bicostata</i> , <i>Eucalyptus dunnii</i> , <i>Eucalyptus globulus</i> , <i>Eucalyptus grandis</i> , <i>Eucalyptus maidenii</i> , <i>Eucalyptus viminalis</i>)
Chile	Bio Bio, La Araucanía, Libertador General Bernardo O'Higgins, Los Lagos, Los Ríos, Maule, Ñuble	9.43%	Eucalyptus (<i>Eucalyptus delegatensis</i> R. Baker, <i>Eucalyptus globulus</i> , <i>Eucalyptus hibrido</i> , <i>Eucalyptus nitens</i> , <i>Eucalyptus regnans</i> , <i>Eucalyptus smithii</i>)
Spain	Andalucía, Asturias, Cantabria, Castilla y León, Galicia, País Vasco	5.76%	Eucalyptus (<i>Eucalyptus globulus</i> , <i>Eucalyptus nitens</i> , <i>Eucalyptus regnans</i>)
Sweden	Whole country	5.21%	Aspen (<i>Populus tremula</i>), Beech (<i>Fagus sylvatica</i> L.), Birch (<i>Betula pendula</i>), Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus cembra</i> , <i>Pinus contorta</i> , <i>Pinus nigra</i> , <i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Finland	Whole country	3.60%	Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i>), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Denmark	Whole country	0.68%	Beech (<i>Fagus sylvatica</i> L.), Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i>), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Switzerland	Aargau, Basel Country, Bern, Jura, Schaffhausen, Solothurn, Thurgau	0.59%	Ash (<i>Fraxinus excelsior</i> L.), Beech (<i>Fagus sylvatica</i> L.), Spruce (<i>Picea abies</i>)
Latvia	Whole country	0.48%	Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i>), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Poland	Whole country excluding Bialowiza, Browsk and Hajnowka	0.32%	Beech (<i>Fagus sylvatica</i> L.), Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Austria	Whole country	0.32%	Alder (<i>Alnus glutinosa</i> , <i>Alnus incana</i> , <i>Alnus viridis</i>), Ash (<i>Fraxinus excelsior</i> L.), Beech (<i>Fagus sylvatica</i> L.), Douglas Fir (<i>Pseudotsuga menziesii</i>), Hornbeam (<i>Carpinus betulus</i> L.), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Maple (<i>Acer campestre</i> L., <i>Acer platanoides</i> , <i>Acer pseudoplatanus</i>), Pine (<i>Pinus cembra</i> , <i>Pinus nigra</i> , <i>Pinus sylvestris</i>), Poplar (<i>Populus alba</i> , <i>Populus nigra</i>), Spruce (<i>Picea abies</i>)
Norway	Whole country	0.31%	Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
France	Whole country	0.27%	Ash (<i>Fraxinus excelsior</i> L.), Beech (<i>Fagus sylvatica</i> L.), Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i>), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Estonia	Whole country	0.27%	Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i>), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Czech Republic	Whole country	0.15%	Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus cembra</i> , <i>Pinus nigra</i> , <i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Lithuania	Whole country	0.06%	Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)

COUNTRY	REGIONS	COUNTRY SHARE	TREE SPECIES
Slovakia	Whole country	0.05%	Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus cembra</i> , <i>Pinus nigra</i> , <i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
United Kingdom	Scotland	0.04%	Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Hungary	Whole country	0.03%	Alder (<i>Alnus viridis</i>), Ash (<i>Fraxinus excelsior</i> L.), Beech (<i>Fagus sylvatica</i> L.), Hornbeam (<i>Carpinus betulus</i> L.), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus cembra</i> , <i>Pinus nigra</i> , <i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
South Africa	Eastern Cape, Gauteng, Kwa-Zulu Natal, Mpumalanga	0.02%	Eucalyptus (<i>Eucalyptus camaldulensis</i> (rostrata), <i>Eucalyptus cladocalyx</i> , <i>Eucalyptus cloeziana</i> , <i>Eucalyptus diversicolor</i> , <i>Eucalyptus fastigata</i> , <i>Eucalyptus fraxinoides</i> , <i>Eucalyptus grandis</i> X <i>Eucalyptus camaldunensis</i> hybrid, <i>Eucalyptus grandis</i> X <i>Eucalyptus nitens</i> hybrid, <i>Eucalyptus grandis</i> X <i>Eucalyptus tereticornis</i> hybrid, <i>Eucalyptus maculata</i> , <i>Eucalyptus microcorys</i> , <i>Eucalyptus saligna</i> , <i>Eucalyptus smithii</i> , <i>Eucalyptus urophylla</i>)
Slovenia	Whole country	0.02%	Alder (<i>Alnus glutinosa</i> , <i>Alnus incana</i> , <i>Alnus viridis</i>), Ash (<i>Fraxinus excelsior</i> L.), Beech (<i>Fagus sylvatica</i> L.), Hornbeam (<i>Carpinus betulus</i> L.), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Maple (<i>Acer campestre</i> L., <i>Acer platanoides</i> , <i>Acer pseudoplatanus</i>), Pine (<i>Pinus cembra</i> , <i>Pinus nigra</i> , <i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Portugal	Whole country	0.02%	Eucalyptus (<i>Eucalyptus globulus</i> , <i>Eucalyptus nitens</i>)
Belgium	Whole country	0.01%	Beech (<i>Fagus sylvatica</i> L.), Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i>), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Brazil	Amapá, Rio de Janeiro, Rio Grande do Sul, Santa Catarina	< 0.01%	Eucalyptus (<i>Eucalyptus dunnii</i> , <i>Eucalyptus urograndis</i>)
Netherlands	Whole country	< 0.01%	Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i> , <i>Larix leptolepis</i> (kaempferi)), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Luxembourg	Whole country	< 0.01%	Beech (<i>Fagus sylvatica</i> L.), Douglas Fir (<i>Pseudotsuga menziesii</i>), Larch (<i>Larix decidua</i>), Pine (<i>Pinus sylvestris</i>), Spruce (<i>Picea abies</i>)
Bosnia and Herzegovina	Whole country	< 0.01%	Spruce (<i>Picea abies</i>)
Mozambique	Manica, Sofala	< 0.01%	Eucalyptus (<i>Eucalyptus urograndis</i>)
TOTAL		100.00%	

TREE SPECIES (summary of the tree species in the table above)

Alder (*Alnus glutinosa*, *Alnus incana*, *Alnus viridis*), **Ash** (*Fraxinus excelsior* L.), **Aspen** (*Populus tremula*), **Beech** (*Fagus sylvatica* L.), **Birch** (*Betula pendula*), **Douglas Fir** (*Pseudotsuga menziesii*), **Eucalyptus** (*Eucalyptus bicostata*, *Eucalyptus camaldulensis* (rostrata), *Eucalyptus cladocalyx*, *Eucalyptus cloeziana*, *Eucalyptus delegatensis* R. Baker, *Eucalyptus diversicolor*, *Eucalyptus dunnii*, *Eucalyptus fastigata*, *Eucalyptus fraxinoides*, *Eucalyptus globulus*, *Eucalyptus grandis*, *Eucalyptus grandis* X *Eucalyptus camaldunensis* hybrid, *Eucalyptus grandis* X *Eucalyptus nitens* hybrid, *Eucalyptus grandis* X *Eucalyptus tereticornis* hybrid, *Eucalyptus hibrido*, *Eucalyptus maculata*, *Eucalyptus maidenii*, *Eucalyptus microcorys*, *Eucalyptus nitens*, *Eucalyptus regnans*, *Eucalyptus saligna*, *Eucalyptus smithii*, *Eucalyptus urograndis*, *Eucalyptus urophylla*, *Eucalyptus viminalis*), **Hornbeam** (*Carpinus betulus* L.), **Larch** (*Larix decidua*, *Larix leptolepis* (kaempferi)), **Maple** (*Acer campestre* L., *Acer platanoides*, *Acer pseudoplatanus*), **Pine** (*Pinus cembra*, *Pinus contorta*, *Pinus nigra*, *Pinus sylvestris*), **Poplar** (*Populus alba*, *Populus nigra*), **Spruce** (*Picea abies*)