

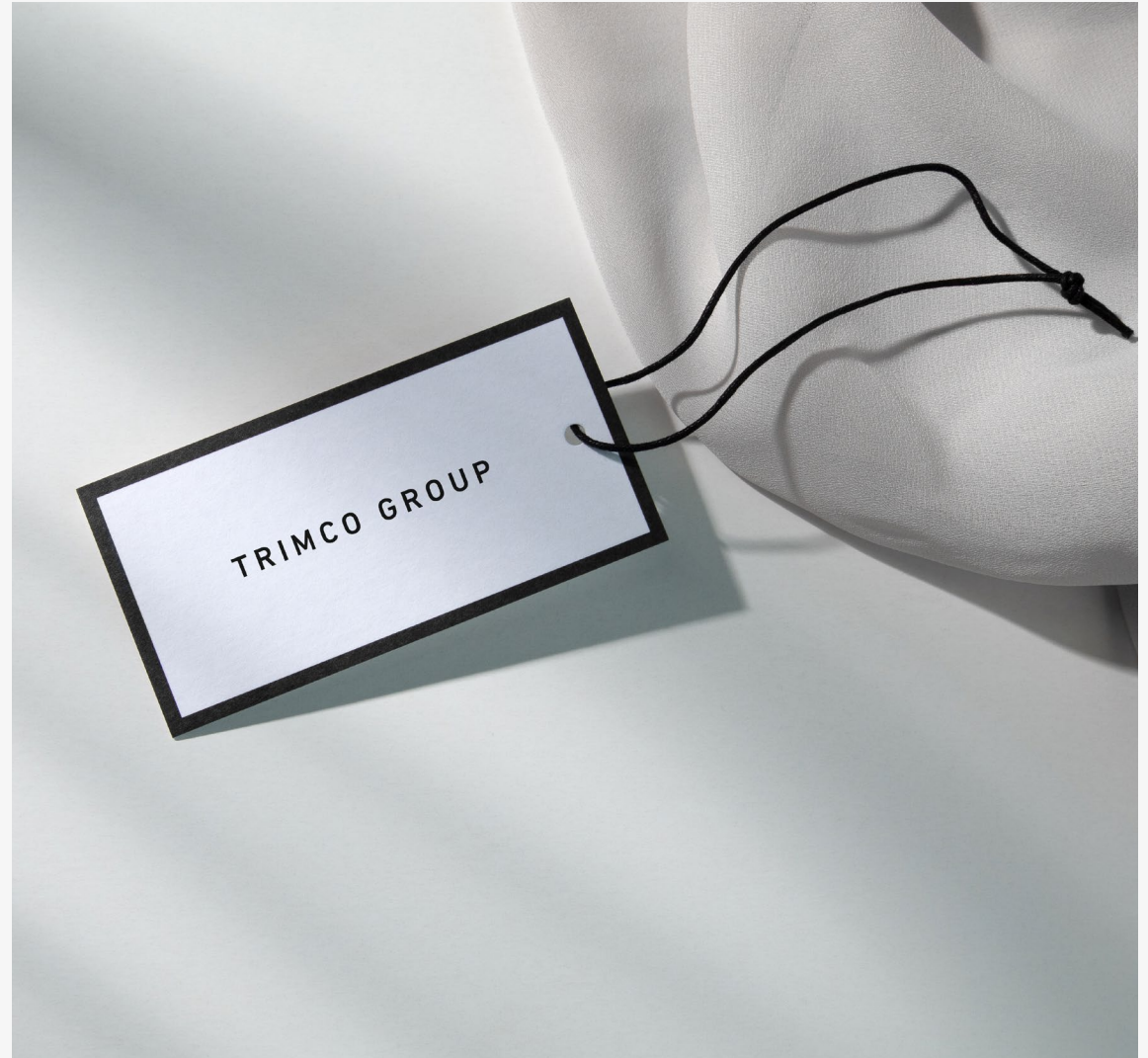
EUDR STATEMENT on DEFORESTATION and FOREST DEGRADATION.

COMMITMENT – Trimco Group is committed to comply to the regulation on deforestation (EU Deforestation Regulation) EUDR Regulation (EU) **2023/1115** on deforestation and forest degradation.

EUDR BACKGROUND

On 29 June 2023, the Regulation on Deforestation-free Products (EUDR) entered into force. The main driver of deforestation is the expansion of agricultural land linked to the production of commodities like cattle, wood, cocoa, soy, palm oil, coffee, rubber, and some of their derived products, such as leather, chocolate, tyres, or furniture. As a major economy and consumer of these commodities linked to deforestation and forest degradation, the EU is partly responsible for this problem, and it wants to lead the way to solving it.

Under the Regulation, any operator or trader who places these commodities on the EU market, or exports from it, must be able to prove that the products do not originate from recently deforested land or have contributed to forest degradation.¹



TRANSITIONAL RULES

According to the regulation and the Commission's Guidance, the applicable regime depends on the wood's harvest/production date and the date the product is placed on the EU market.

Finished products placed on the EU market before December 30, 2025 do not need to comply with EUDR. For finished products placed on the EU market on or after December 30, 2025, compliance is determined by when the underlying wood-based input (cellulose in our case) was first placed on the EU market.

For example, if the cellulose entered the EU market before December 30, 2025 and our paper suppliers manufactured the paper in 2026, that paper product is not subject to the EUDR. Accordingly, the EUDR applies to any finished product whose underlying wood-based inputs are first placed on the EU market on or after December 30, 2025.

REGULATORY UPDATES

Trimco Group follows the evolving EUDR regulations closely, and we're committed to being compliant to the EUDR regulations. We follow all regulatory updates and adjust our actions accordingly. The EUDR regulation has been postponed on many occasions, and the timelines are still uncertain. However, we at Trimco Group are still committed to following the EUDR guidelines regardless of changing timelines.^{2,3}

As we follow the evolving EUDR regulations closely we now know that there is a postponement of the EUDR regulation. We will therefore have until December 2026 for EUDR compliance.⁴

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TRIMCO GROUP SCOPE

Trimco Groups' products that are made from WOOD i.e paper are in scope of EUDR regulations.

Finished goods - Paper products that are imported from outside EU to TRIMCO DENMARK: EORI nr. DK18435543 warehouse under the commodity code 48xxxx are in scope of EUDR.

Rolls of blank labels, pre-printed brand labels, swing-tags, label sheets, etc. sold as merchandise in their own right (to printers, co-packers, retailers) imported as its own product to Trimco Group Denmark are in scope of the EUDR regulation.

Tags or paper packaging applied to the garment at the garment factory are not in scope of EUDR. Those apparel or shoes imported to the EU no longer comes under the HS code that is in scope of EUDR.

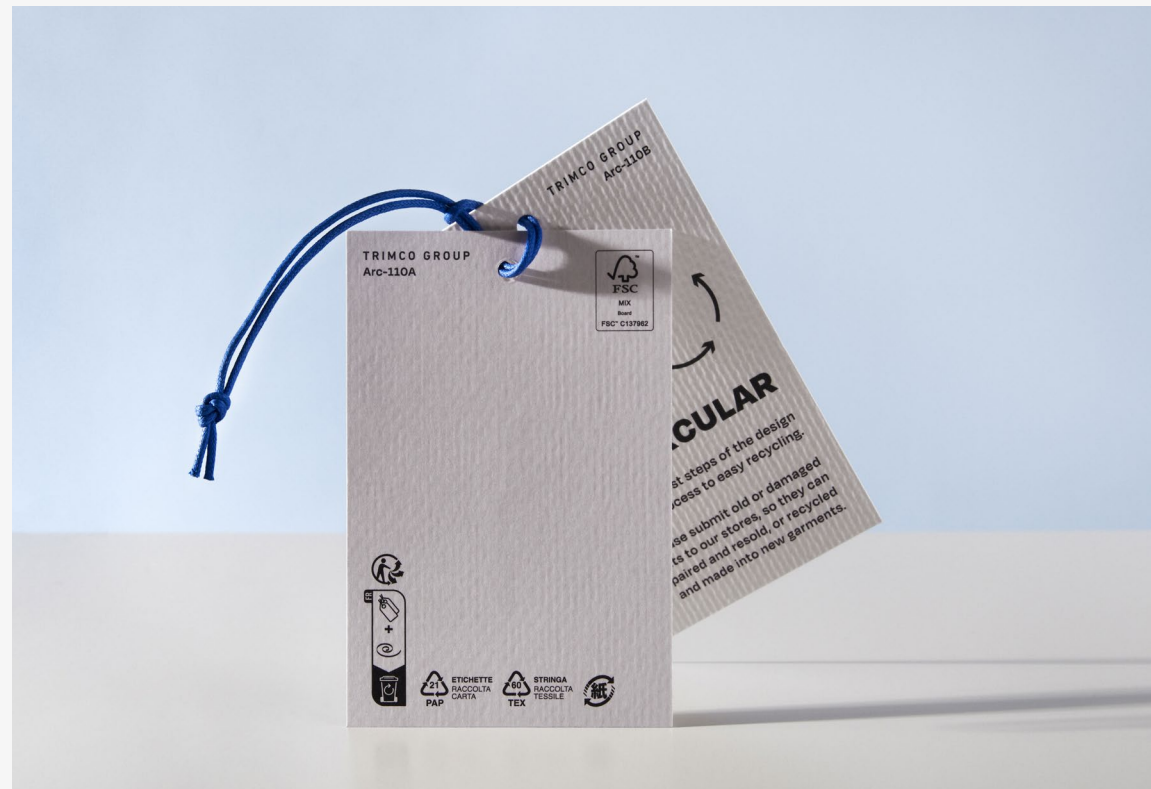
TRIMCO GROUP ACTION

1. In 2025 we actively map out all products that are IN and OUT of Scope of EUDR.
2. In 2025 for products in scope, the first action is to actively change any paper product we currently supply to become FSC Recycled 100% certified. Thereby the import commodity code will be the “out of Scope for EUDR in the” Y- HS code (Y865).
3. In 2025 our development process includes an in-scope EUDR assessment so products will not be developed that are “in scope” for EUDR. Instead, all will use raw materials certified as FSC Recycled 100%.³
4. For products in scope where we cannot change to FSC Recycled 100% we use productDNA Packaging manager “TM” to collect details on papermill, paper pulp, tree type, geographical location. And we collect the DDS from our paper suppliers- to ensure ‘ascertaining’ that due diligence has been carried out, so that large companies downstream benefit from simplified obligations (a minimal legal obligation of collecting reference numbers of Due Diligence Statement (DDS) from their suppliers and using those references for their own DDS submissions now applies.

Update April 2026: Pr the commissions published simplification of EU Deforestation Regulations⁵ TRIMCO Group (Denmark, Spain, Romania) will now be classified as “Upstream MSPO”.⁶

FSC™ CERTIFIED

Trimco Group holds a multi-site FSC certification for both FSC Recycled 100% paper products as well as FSC Mix paper products: FSC-STD-40-004 V3-1. Please see attachment.



SOURCES

1. https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en
2. On 15th April 2025 EU simplified the Due Diligence and reporting rules on Commission takes action to simplify the implementation of the EU Deforestation Regulation
3. On 23rd September 2025: <https://www.euractiv.com/content/uploads/sites/2/2025/09/EUDR.pdf>
4. EUDR delay approved by European Parliament
5. Commission publishes simplification review of EU Deforestation Regulation: https://ec.europa.eu/commission/presscorner/detail/en/ip_26_941
6. EUDR supply chain infographics (4th edition) - Publications Office of the EU: <https://op.europa.eu/en/publication-detail/-/publication/0fd-4de13-4371-11f1-8095-01aa75ed71a1/language-en>



PLEASE CONTACT

denmark@trimco-group.com for assistance on EUDR related queries/questions.

