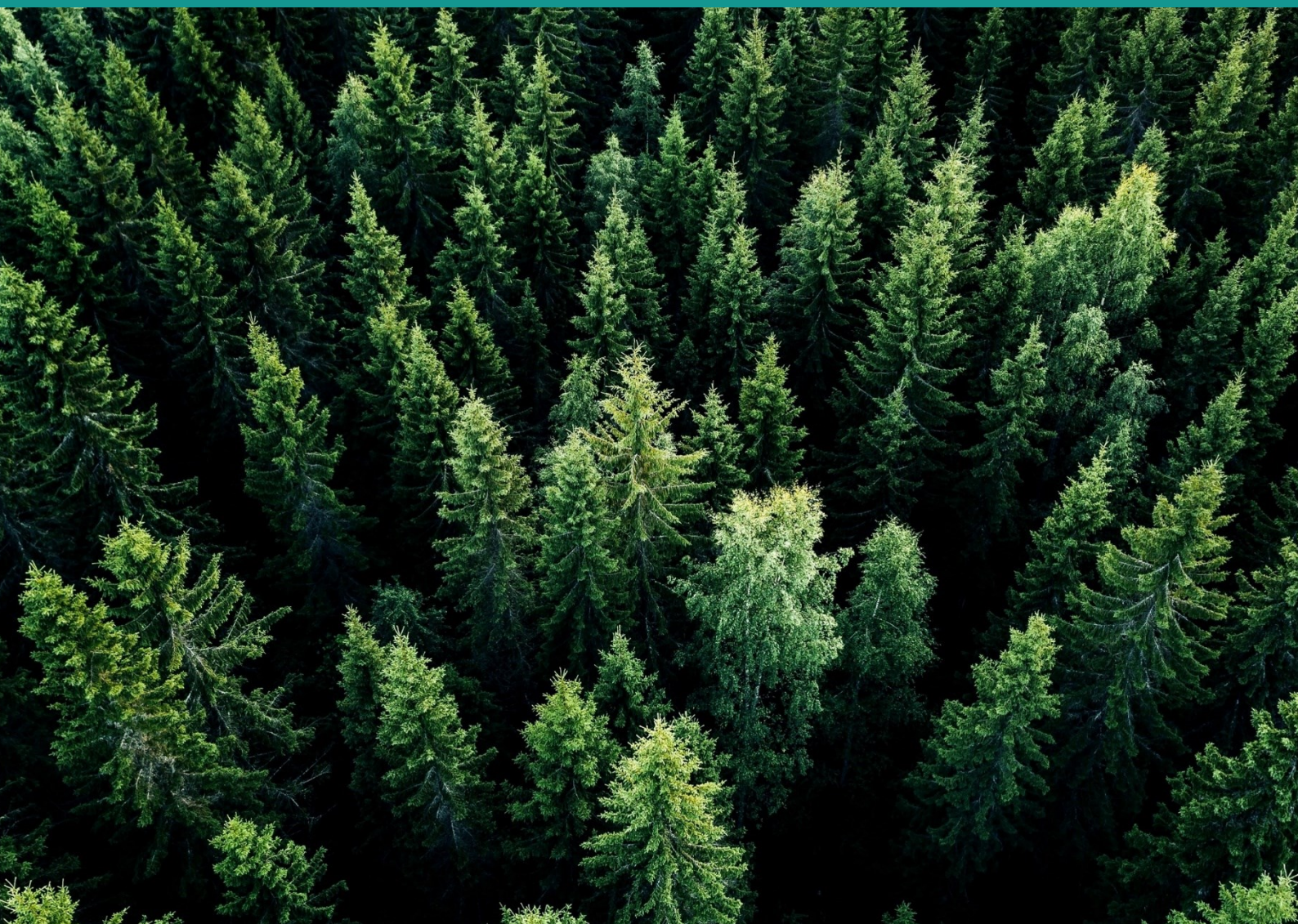




Responsible Sourcing Policy



February 2025

Brigl & Bergmeister (B&B) Responsible Sourcing Policy

1. Introduction

Sustainability is an integral principle of our supply chain management. We help to protect our environment and our planet with continuous improvement in our production, waste treatment, processes of recycling and by responsible sourcing.

Responsible sourcing is a powerful tool for driving sustainable values and practices throughout the value chain. We define responsible sourcing as the procurement of goods and materials in a manner that adheres to criteria for sustainable development—encompassing social and environmental responsibilities—while prioritising full compliance with legal requirements in the country of origin of the sourced products. Through this approach, we aim to ensure adherence to applicable international and local laws, with a specific commitment to aligning with the legality requirements outlined in the EUDR.

We aim to build strong proactive and long-term working relations and partnerships with our suppliers and in doing so, promote responsible conduct along our supply chain. If a supplier is not able to meet our minimum requirements, we will work with them to implement appropriate corrective actions and reserve the right to suspend sourcing from the supplier until we are satisfied with their performance.

In alignment with the EU Regulation on Deforestation-free Products (EUDR)¹, our Responsible Sourcing Policy seeks to ensure legally compliant and environmentally sound sourcing practices, while upholding our commitment to human rights at every supply chain level. This policy aligns the principles, guidelines and requirements laid out in the EUDR; [OECD-FAO deforestation due diligence guidelines](#); [UN Global Compact Principles](#) and the [OECD Guidelines for Multinational Enterprises](#); [UN Guiding Principles for Business and Human Rights](#), the [United Nations Universal Declaration of Human Rights](#), the [ILO fundamental conventions](#) and the United Nations Conventions on the Rights of the Child and the [Elimination of All Forms of Discrimination against Women \(CEDAW\)](#). This policy also aligns with the [Accountability Framework Initiative \(AFI\) guidelines](#) and [Preferred by Nature's Sustainability Framework EUDR Relevant Indicators](#).

The implementation of our policy includes due diligence, consistent policy reviews and updates, robust supplier engagement and capacity building, transparent and annual reporting, and the implementation of an effective complaints mechanism. All these measures are aimed at fostering supply chains that reflect our commitment to environmental integrity, ethical practices, and social responsibility.

This policy is endorsed at the executive level of our organisation. Updates and further information in relation to the policy can be found on our website here: www.brigl-bergmeister.com. For any questions regarding our Responsible Sourcing Policy please contact sustainability@brigl-bergmeister.com.

¹ REGULATION (EU) 2023/1115 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010, available [here](#).

2. Responsible Management and Business Practices

As part of our commitment to responsible sourcing, we will uphold the highest standards of environmental stewardship, social responsibility and ethical conduct across all of our operations. This is reflected in our comprehensive approach to sourcing wood and fibre products ensuring that our practices are not only in full compliance with legal requirements in the country of origin.

2.1 Land Tenure and Management Rights are Secure.

We seek to ensure that land tenure and management rights of the farms and forests we source from are secure and established for all rights holders involved. This includes ensuring that land tenure rights are registered in accordance with the legal requirements of the country of origin, as well as ensuring that the proper registration of land management rights in compliance with applicable legislation is secured.

Recognising the importance of respecting the rights and resources of Indigenous Peoples and local communities, we ensure that Free Prior and Informed Consent (FPIC) is obtained from Indigenous Peoples whenever forest operations associated with our forest or fibre products, we source have the potential to impact their lands or livelihoods. Our commitment extends to ensuring that all land tenure rights are securely registered in compliance with legal requirements, and that land management practices are responsibly implemented and duly recorded.

2.2 Management Planning and Operations are Conducted Responsibly.

The land-use, management planning and operational activities in the forests we source from, adhere to all legal requirements, including the lawful harvesting of forest products or production of agricultural commodities. Furthermore, we are committed to transparency, complying with legal mandates for the disclosure of relevant information to stakeholders.

2.3 Taxes and Fees are Paid.

We ensure the timely and lawful payment of all applicable taxes and fees, including royalties, land/area taxes, value-added taxes, corporate taxes and any relevant trade or export taxes and fees.

2.4 Corruption, Fraud and Conflict of Interest are Avoided.

Our operations are founded on principles of integrity and accountability, with stringent measures in place to avoid corruption, fraud and conflicts of interest, while business integrity is ensured according to best practices. We seek to ensure compliance with all legal requirements addressing bribery, fraud and conflict of interest. We also take measures to avoid the falsification of data and documents, in order to foster a culture of honesty and transparency.

2.5 Trade and Procurement are Responsible.

Trade and procurement practices must be conducted in accordance with legal requirements, including those relating to trade and transport of products, trade restrictions and sanctions, laws relating to product classification and import/export regulations.

Respecting principles of fairness and transparency in contractual obligations, we also adhere to legal requirements for offshore trading, transfer pricing and due diligence, ensuring that our sourcing practices are not only lawful but also ethically and socially responsible.

3. Environmental Responsibility

We are committed to avoiding negative impacts on the environment caused by our own activities and those activities of our suppliers.

3.1 Forests and Other Ecosystems are not Converted.

We recognise that forests and natural ecosystems are vital for maintaining biodiversity, regulating the climate, and supporting the livelihoods of millions of people. Deforestation and ecosystem degradation not only contribute to climate change but also threaten the survival of communities and species worldwide.

We work to ensure our activities do not contribute to deforestation or the conversion of natural ecosystems. **After 31 December 2020**, we ensure that none of our supply chains source raw materials from areas that have been converted from forest to agricultural land, degraded or converted primary forests to plantations or other wooded lands, or from degraded naturally regenerating forests.

3.2 Natural Forests and Other Ecosystems are not Degraded.

Our sourcing activities are designed to prevent the degradation of natural forests and other ecosystems and maintain their long-term productivity.

3.3 Ecosystems and Biodiversity Values are Identified and Protected.

All legal requirements concerning biodiversity conservation, the protection of endangered species, and the trade of CITES-listed species are rigorously met.

3.4 Chemicals Are Used Responsibly with Minimal Negative Impacts

In compliance with EUDR, we ensure legal requirements for the safe and responsible use, storage, and disposal of chemicals to avoid negative environmental impacts along our supply chain.

3.5 Waste is Reduced and Managed Responsibly.

We actively manage and minimise the volume and negative impact of waste generated from our activities, including production and processing, in compliance with legal waste management requirements. This includes strict adherence to laws governing the disposal and management of waste, ensuring minimal environmental impact along our supply chain.

3.6 Water Resources Are Protected and Used Efficiently

We ensure compliance with all legal requirements for protecting and using surface and groundwater resources responsibly, avoiding overuse and contamination.

3.7 Soil Is Conserved and Managed Appropriately

All sourcing activities comply with legal requirements for soil conservation, ensuring sustainable land use and maintaining long-term productivity.

4. Social Responsibility

We are committed to ensuring that people's welfare and the rights of individuals are respected and avoid engaging in or benefitting from controversial business practices. This commitment encompasses a broad spectrum of subject matters intended to uphold human dignity, promote fair labour practices, and foster positive community relations.

4.1 Human Rights are Respected.

We ensure that human rights are upheld across all operations and activities, adhering to both international and national laws.

Our sourcing activities of wood and fibre do not contribute to human rights violations or fuel armed conflicts.

4.2 Child Labour is Absent in Our Supply Chains. The Employment of Young Workers is Responsibly Managed.

We work to ensure all legal requirements are met, in relation to child labour.

Children under the age of 15 (or underage for the completion of compulsory education, whichever is higher) are not employed, except within the framework of "Family Farm" work², or were covered by the national legislation.

We ensure the protection of children and where young workers are employed, their engagement is managed in line with best practices and legal requirements.

4.3 Modern Slavery, Forced or Compulsory Labour Do Not Occur.

Our operations are free from forced labour, modern slavery, and human trafficking. We ensure that workers have the freedom to choose their employment, without undue restrictions or dependences.

4.4 Workers' Rights are Respected.

We do not source from forests in which there are knowingly any activities that are against the principles of the ILO Core Conventions as defined in the 1998 ILO Declaration on Fundamental Principles and Rights at Work.

We respect the rights of all workers, in alignment with any legal requirements related to rights to freedom of association, collective bargaining, fair working hours, and rest periods.

Where migrant workers are hired, their employment rights follow legal requirements. Their legal authorisation to enter, stay and engage in a remunerated activity in the area/country is ascertained. They enjoy the freedom to travel to and from the area/country without restrictions, except those defined by law and are afforded equal opportunities and treatment in comparison with all other workers.

4.5 Discrimination Does not Occur.

Discrimination in employment or occupation is not tolerated, in alignment with legal requirements. We also ensure fairness in hiring, remuneration, training, promotion, employment termination and retirement practices.

4.6 Workers are Remunerated in a Responsible Manner.

² See [Preferred by Nature Certification - Terms and Definitions](#) (PBN-09) and <http://www.fao.org/3/a-i4306e.pdf>

All workers - whether permanent, contracted, seasonal or migrant workers - are compensated fairly, ensuring compliance with legal wage requirements.

Their remuneration for a standard workweek is sufficient to afford a decent standard of living for the worker and their family and meet or exceed minimum industry standards or other recognised industry wage standards.

4.7 Facilities, Operations and Activities are Safe.

We ensure safe and healthy facilities and operations, providing appropriate personal protective equipment to all workers.

Compliance with workplace health and safety laws is non-negotiable. Workers must be competent in the handling chemicals and machinery and receive appropriate trainings. All necessary equipment and services – such as personal protective equipment, tools and appropriate facilities for cleaning and washing, first-aid equipment and medical services – are available to, and used by, workers.

4.8 The Rights of Indigenous Peoples are Known and Respected.

We recognise and respect the rights of Indigenous Peoples potentially affected by our organisation's activities, engaging with them in a manner that is respectful, culturally appropriate, and based on the principles of Free, Prior, and Informed Consent (FPIC).

4.9 Communities are Supported and Their Rights are Respected.

Our relationship with local communities in the areas where our agricultural and forest commodities are produced is based on respect, collaboration, and mutual benefit. We recognise and respect both legally established community rights and customary rights.

Sites and resources, habitats of cultural, archaeological or historical significance, and/or of religious/sacred importance for the traditional cultures of communities affected by operations are identified and protected as appropriate.

4.10 Culture is Respected and Valued.

We are committed to protecting and valuing cultural, historical, and spiritual sites and traditions and to ensuring that our practices respect the intellectual property rights of local and Indigenous communities.

5. Our procurement of fibre

Our core activity centers on sourcing virgin fibers and producing specialty paper, making fiber procurement essential to meeting our objectives for responsible sourcing. As a specialty paper manufacturer, B&B's commitment to sourcing responsibly managed wood and fiber is crucial for maintaining a stable and sustainable supply chain.

B&B's fiber procurement strategy adheres to the highest sustainability standards, specifically the Forest Stewardship Council® (FSC) and Programme for the Endorsement of Forest Certification® (PEFC). **All fibers we source are FSC- and/or PEFC-certified**, ensuring responsible forestry practices. Our mills are chain-of-custody certified, providing traceability and ensuring that no uncertified or controversial forest resources are used. The FSC Controlled Wood Standard (FSC-STD-40-005) sets B&B's minimum requirement, preventing material from sources involving:

- illegally harvested wood,
- wood harvested in violation of traditional and human rights (e.g., forced or child labor),

- wood from forests where high conservation values are under threat,
- wood from forests converted to plantations or non-forest use,
- wood from forests with genetically modified trees.

6. Procurement of other raw materials, packaging and services

We have a supplier relationship management system in place to ensure that there is a consistent process in place for selection, monitoring and management of our suppliers and respectively raw materials, packaging and services. The system enables us to identify and develop strategic partners, build long-term relationships and help mitigate the impacts of our supply chain and our products.

We will continually review our supplier relationship management system in order to ensure consistency in approach across our business and to ensure that we are effectively managing our supply chain.

We will take care that all our employees understand and implement this policy and monitor our performances. We will review our management systems, including this policy, on a regular basis to ensure they remain current and appropriate to the nature and scale of our operations.

7. B&B's Approach to EUDR Compliance

As both an operator and trader under the EU Deforestation Regulation (EUDR, EU Regulation No. 2023/1115), we are committed to fully aligning our sourcing activities with its requirements. To this end, we have established a robust due diligence system, complete with necessary procedures and processes, to support our compliance efforts. This system enables us to collect all relevant information mandated by the EUDR, ensuring transparency and traceability throughout our supply chains.

Our due diligence activities involve thoroughly evaluating collected information and assessing potential risks associated with deforestation and legal compliance. We implement proactive measures to address these risks, preventing deforestation and forest degradation in our supply chains with a strict cut-off date of December 31, 2020.

In accordance with EUDR legality requirements in each country of production, our sourcing practices ensure compliance with:

- land use rights,
- environmental protection standards,
- forest management and biodiversity conservation,
- third-party rights,
- labor rights,
- internationally protected human rights,
- the principle of Free, Prior, and Informed Consent (FPIC) as outlined by the UN Declaration on the Rights of Indigenous Peoples, and
- relevant tax, anti-corruption, trade, and customs regulations.

By adhering to these standards, we are committed to a responsible and transparent supply chain that aligns with EUDR's core objectives.

7.1 Our Due Diligence Process

Our due diligence process is structured to ensure traceability, risk assessment, and EUDR compliance throughout our wood and fibre supply chains. We begin by collecting detailed information on suppliers and material sources to enable clear traceability from origin to end use.

This data underpins our risk assessments, ensuring that each supplier's practices align with our deforestation-free sourcing policy and regulatory requirements.

Risk assessments are conducted across all wood and fibre supply chains to confirm adherence to EUDR standards. When suppliers have previously conducted due diligence, we independently assess and verify their practices before integrating this information, ensuring it meets our standards.

If we identify any risks that are more than negligible, we take targeted mitigation actions. These may include direct engagement with suppliers, requiring corrective actions, or conducting on-site checks to resolve issues. This approach helps us manage risks effectively, maintain sustainable sourcing practices, and ensure that our products meet EUDR compliance.

7.2 Policy Review and Updates

We conduct annual reviews of our policies to align with regulatory changes, deforestation risks, and due diligence performance. Updates are documented and communicated across all levels, ensuring alignment and continuous awareness of EUDR requirements.

7.3 Supplier Engagement and Capacity Building

We actively engage suppliers to ensure EUDR compliance through clear requirements, regular audits, and training. Suppliers must inform us of any significant sourcing changes, allowing proactive risk management and alignment of their practices with our deforestation-free goals.

7.4 Transparent Annual Reporting

Annually, we publicly report on our due diligence, including product summaries, origins, risk assessments, and corrective actions. When applicable, reports also include stakeholder consultations in production areas. This transparency meets EUDR standards and fosters accountability.

7.5 Complaints Mechanism

Our complaints mechanism addresses substantiated concerns about deforestation risks within two weeks. All complaints and responses are documented, and stakeholders are informed as needed. This mechanism enables swift action to maintain supply chain integrity and compliance. Online Whistleblowing Channel is in place using our [Ethical reporting Channel](#).

Responsible Business Practices We Will Undertake

In order to ensure the success of our Responsible Sourcing Policy, we will carry out the following actions:

- Ensure all of our supply chains and all of our purchases are FSC certified
- Conduct risk assessments on all supply chains, focusing on legal compliance in the country of origin and deforestation risks.
- Implement risk mitigation measures in collaboration with suppliers when necessary.
- Perform annual audits of selected suppliers to ensure ongoing compliance.
- Collaborate with suppliers to evaluate and enhance their due diligence systems.
- The due diligence system is integrated in our quality management system.

Certification Schemes and Engagement in other Initiatives

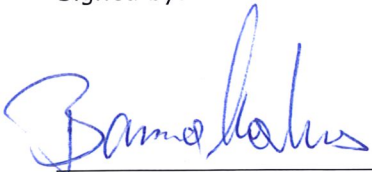
We are committed to only sourcing wood and fibre that have been certified against FSC and PEFC.

Review and Adaptation of This Policy

We will carry out ongoing monitoring of internal systems and procedures which underpin the implementation of this Responsible Sourcing Policy. As necessary and applicable, access will also be made for external evaluations of the performance of the relevant systems are in place, to ensure that they are implemented and functioning as intended.

Adaptions will be made to both the Responsible Sourcing Policy and the systems and procedures which underpin its implementation, in response to new insights, changes in international norms or regulatory requirements, as well as stakeholder feedback. This dynamic approach allows us to be agile and responsive to emerging challenges and opportunities, ensuring our policies not only meet current sustainability standards but also anticipate future needs and trends.

Signed by:



Markus Bammer, Managing Director
Date: 21/02/2025



Markus Pölzl, Managing Director
Date: 21/02/2025