

EUDR – Brief update for our customers

As of March 2026

Dear business partners,

EU Regulation (EU) 2023/1115 on deforestation-free supply chains ('EUDR') is being revised and its implementation postponed.

As a medium-sized enterprise, the regulation currently applies to us from 30 December 2026. Furthermore, simplifications to the requirements have been announced, although the specific details have not yet been finalised.

We are working intensively to implement all legal requirements in good time and to design our processes in such a way that you, as our customers, receive the necessary legal certainty.

From 30 December 2026, we will be fully EUDR-compliant.

Reflex GmbH & Co. KG
Dr.-Ing. Tiemo Arndt
Managing Director

Our role in the supply chain

We are a paper mill and process pulp into paper.

The pulp we use is already placed on the market within the EU by our suppliers.

Therefore, within the meaning of the EUDR, we are:

- a downstream operator (trader)
- not a first-time supplier

What this means for you:

- We are not obliged to issue our own Declaration of Due Diligence (DDS)
- In future, we will pass on our suppliers' EUDR reference numbers as soon as they become available

Current status of implementation

- We are continuously monitoring regulatory developments regarding the EUDR
- We do not yet have any reference numbers from our suppliers
- We assume that these will only be provided once the EU requirements have been finalised

Until then, the following applies:

- We are implementing all legal requirements
- We are deliberately refraining from measures that go beyond these requirements,
 - In particular: no data transfer to third-party systems
 - no disclosure of additional information not required

Sustainability standards

- Regardless of the EUDR, all relevant Reflex products have been FSC®-certified for many years.
- This certification and further measures ensure that our products do not originate from the following sources:
 - illegally logged forests
 - forests where human rights have been violated
 - areas of high conservation value
 - conversion to plantations or non-forestry use
 - use of genetically modified trees

Outlook

As soon as the final requirements and the necessary data from our suppliers are available, we will:

- provide the relevant information in a structured manner
- and support you as best we can in fulfilling your EUDR obligations

Kind regards,

Reflex GmbH & Co. KG