



# Stora Enso EU Deforestation Regulation (EUDR) Due Diligence summary for Joint Operations

Stora Enso's **EU Deforestation Regulation (EUDR) Due Diligence summary for Joint Operations** provides a concise overview of how Veracel (Brazil) and Montes del Plata (Uruguay) fulfill EUDR obligations for pulp production. The document emphasizes a three-step due diligence process (information collection, risk assessment, and risk mitigation) to ensure products are deforestation-free, legally compliant, and traceable. It discusses plantation management, biodiversity, and human rights commitments alongside strict procedures for land acquisition, supplier evaluations, and ongoing voluntary internal audits for different purposes. The summary also describes our practice for geolocation data sharing, documentation requirements, and archiving protocols, creating a robust framework that aligns with local legislation and EUDR mandates.

## 1. Introduction

This EUDR<sup>1</sup> compliance summary details the due diligence process for and wood chain of custody standards that apply to Stora Enso's Joint Operations Veracel and Montes del Plata. The processes and the summary thereof represent the interpretation of the latest available implementation guidance from the EU.

Veracel is a eucalyptus pulp production unit operated as a Joint Operations with Brazilian pulp and paper company Suzano.

Montes del Plata Mill (=MdP) is a eucalyptus pulp production unit in southwest Uruguay, operated as a Joint Operations together with Chilean pulp producer Arauco.

This document aims to provide customers and other stakeholders ("operators and traders further down the supply chain") with a summary of the due diligence process and key documents supporting compliance.

In the next chapter you will learn about how we manage biodiversity at the plantations and ensure respect for human rights.

Product	HS/CN code
Hardwood pulp: Perform, Perform Plus	47032900

For the text of the Regulation itself, please use the following link: [Official European Union LEX text of the EUDR](#)

<sup>1</sup> The full title being: 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.

## 2. Foundational Sustainability Commitments

### 2.1 Plantations and biodiversity

Plantations typically consist of a mosaic of areas for intensive wood production and set aside areas for biodiversity conservation or other land use. Similar to our managed semi-natural Northern forests, plantations are also certified to ensure the consideration of environmental, social, and economic responsibility. Tree plantations are established only on already degraded lands, and no native forests are converted into plantations.

Neither Stora Enso nor Joint Operations (further down in the text "JO") establish plantations in natural forests, protected areas, or water-sensitive locations. Instead, we only use land with low biodiversity values, such as former pastureland and already degraded lands. We recognize that our plantations are an integral part of local land use and therefore evaluate and define sustainable land use practices specifically for each location.

Both Joint Operations have their own separate biodiversity programmes but with similar focus areas and biodiversity indicators.

The indicators monitor the state of 1) protected areas, 2) restored areas, 3) water quality, and 4) species. The indicators are reported annually on our dedicated webpage: [Biodiversity for tree plantations](#). We continuously assess and develop the indicators as well as invest in the research to enhance biodiversity management and conservation in the plantations.

### 2.2 Human rights

Stora Enso ensures that human rights are respected throughout our operations and business relationships. We align our approach with the UN Guiding Principles on Business and Human Rights, ILO Core Conventions, and the UN Global Compact.

Stora Enso and its Joint Operations are committed to creating long-term value on an economically, socially and environmentally sustainable basis. Legal compliance and ethical business conduct, including respect for human rights and adherence to for example competition law, anti-corruption legislation and trade sanctions, are cornerstones of our sustainability agenda, as evidenced by both the Stora Enso Code, the Joint Operations Code of Conduct and the companies' respective Supplier Code of Conduct. In light of this, each employee is expected to act with integrity and in accordance with laws and internal policies, and to speak up when needed.

Community consultations, including Free, Prior and Informed Consent (FPIC), are a regular element in Stora Enso's human rights due diligence and forestry operations, especially concerning land leasing and indigenous peoples' rights. They are a central tool to mitigate conflicts related to land use. The engagement with the indigenous peoples is designed together with the representatives of the affected

stakeholders. Local communities are consulted during the planning and decision-making stages of new investments. FPIC allows indigenous peoples to give or withhold consent to a project or development through a process where they participate as equals and making decisions about their lands and territories in accordance with their traditions and customs. The aim is to establish bottom-up participation and consultation prior to the beginning of a project or development that takes place on ancestral land or uses resources within the indigenous population's territory. This includes consent on issues that might impact indigenous peoples' rights, lands, territories, resources, traditional livelihoods, and cultural heritage. Stora Enso expects its joint operations to adhere to similar operational procedures.

Stora Enso and both Joint Operations are signatories to the UN Global Compact and maintain robust community engagement programs that promote long-term, respectful partnerships.

Improving value chain transparency is a key component of our due diligence. Stora Enso and both Joint operations are a member of the Supplier Ethical Data Exchange (Sedex), a platform where companies share unit-specific sustainability information with customers. Part of SEDEX offering is Sedex Members Ethical Trade audit (SMETA) which helps companies to understand standards of labour, health and safety, environmental performance, and ethics within own operations or at a supplier site.

We have established effective grievance mechanisms to enable early identification and remediation of adverse human rights impacts. We also verify that land use and tenure rights are respected, in line with our obligations under the EU Deforestation Regulation.

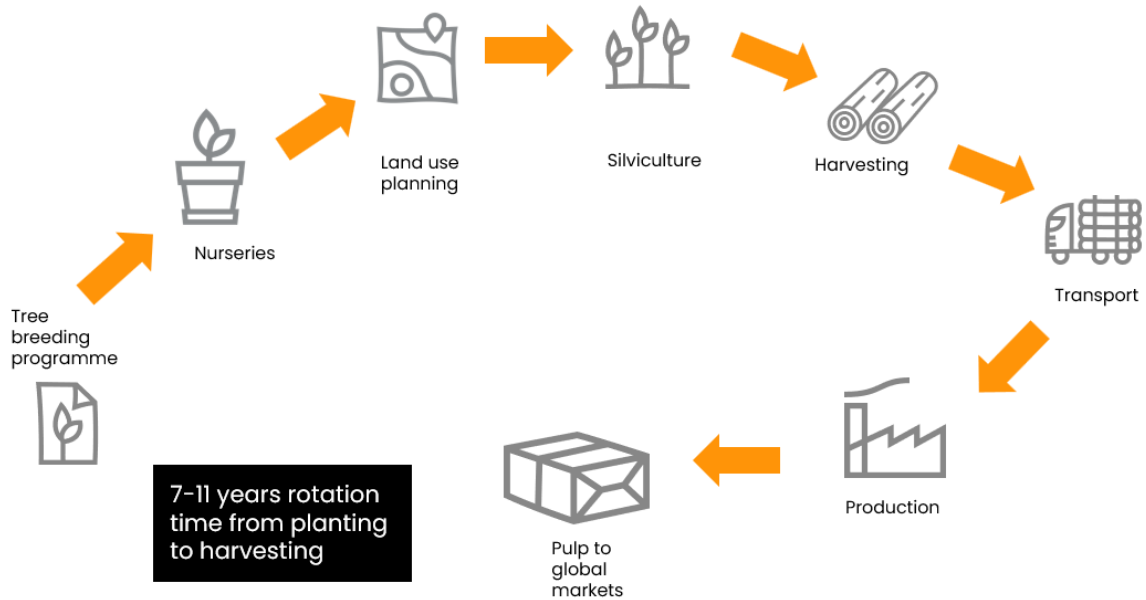
*Read more on the Associated legislation in Latin-America-document and Policies for JO Compliance-document in the Appendix.*

### **3. Due Diligence System**

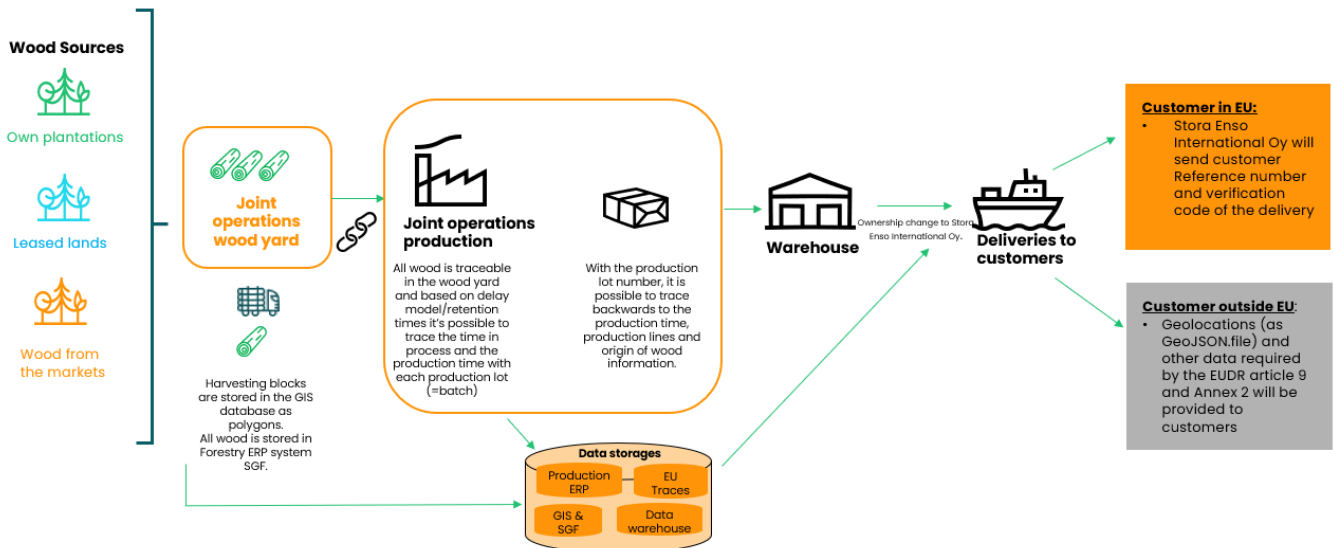
Due diligence is a comprehensive process that involves gathering, verifying, and assessing information to ensure compliance with legal, financial, and operational standards.

The pictures below summarise the value chain of Joint Operations pulp production. For that purpose we have implemented strict due diligence requirements which are described in sections 2 and 3.

# Value chain in pulp production



Picture 1. Description of the value chain in pulp production.



Picture 2. Illustration of traceability and EUDR required information.

For EUDR this means ensuring that the relevant products placed on the EU market:

1. are deforestation-free
2. have been produced in accordance with the relevant legislation of the country of production, and
3. are covered by a due diligence statement.

The due diligence process consists of three steps:

- **Information Collection:** Requirements outlined in Article 9 of the Regulation.
- **Risk Assessment:** Evaluate the risk of deforestation as well as legal/sustainability risks in the supply chain, requirements outlined in Article 10 of the Regulation.
- **Risk Mitigation:** Take steps to mitigate any identified risks, requirements outlined in Article 11 of the Regulation.

For eucalyptus pulp produced in Brazil and Uruguay, and **exported directly to the EU market, we provide customers with EUDR Traces System Reference Numbers and related Verification codes with each delivery.** These EUDR Reference Numbers represent the Due Diligence Statement information entered into the Traces System, as outlined in Annex 2 of the Regulation. Other due diligence information not covered by Due Diligence Statements (in particular, that required in clauses (g) and (h) of Article 9) is written out in this document.

**For eucalyptus pulp produced in Brazil and Uruguay that is sold outside of the EU market, the majority of the data required by Article 9 is provided directly to customers with each delivery.** This is because we cannot provide EUDR Reference Numbers, since these are only available upon a product's entry into the EU via a named port. Parts of Article 9 that cannot be included with each delivery are provided through this document and via email initially. A more convenient method for sharing GeoJSON files is being developed.

Specific information regarding due diligence with regard to clause (g), which requires evidence that products are deforestation-free, is summarised in the next section. Information for both clause (g) and clause (h), which requires evidence that commodities are produced in accordance with local legislation, is opened up in this document.

It is important to note that Stora Enso deems geolocation data competitively sensitive information, it is of critical importance that we are able to agree on certain joint with safeguards our customers and stakeholders for the handling of the data. Additionally, and Non-disclosure Agreement (NDA) with customers need to be in place.

Section 3 concentrates on the wood sourcing and related risk assessments and mitigation actions.

## 4. Wood sourcing

### 4.1 Plantation harvesting governance in Brazil and Uruguay

Most of the wood used in pulp production for both Joint Operations come from own plantations (i.e. owned by the Joint Operations), while a smaller portion is purchased from independent suppliers and private farmers.

#### 4.1.1 Brazil

In Brazil the Law 12,651 of May 25, 2012, known as the new “Forest Code”, establishes standards for the protection of native vegetation in general, including Permanent Preservation Areas (APP), Legal Reserves (RL) and Restricted Use Areas (UR); forest exploitation, the supply of forest raw materials, control of the origin of forest products, control and prevention of forest fires, and the provision of economic and financial instruments to achieve its objectives.

#### 4.1.2 Uruguay

In Uruguay, all new plantations require approval from the National Forest Directorate, part of the Ministry of Agriculture, and those larger than 40 and reforestations (planted before 11/2005) also need environmental authorization from the National Environmental Ministry of Environment. Harvesting activities are included in forest management plans approved by the relevant government organizations, thus do not require additional legal approval.

### 4.2 Wood sourcing Brazil and Uruguay

We have responsible forest management practices in place, FSC® and PEFC certify responsible forest management practices and chain of custody, guaranteeing the origin of the wood, both JOs have FSC biodiversity recognition and monitoring of environmental elements like, water, species, soil, all wood is certified or controlled wood, industry leading environmental and sustainability management practices are applied in managing plantations. FSC and PEFC are both voluntary certification systems but they serve as a solid foundation for EUDR compliance.

Wood procurement in Brazil and Uruguay is handled by the Joint Operations. This ensures thorough evaluations of each supplier.

Incoming wood raw material is divided into these categories:



1. Own plantation and leased lands
2. Market wood

Suppliers in Brazil and Uruguay undergo continuous evaluation for environmental performance, respecting human rights, and community engagement by the Joint Operations. The validity of PEFC and FSC Chain of Custody certificates is checked from respective databases at least once a year. Due diligence systems of suppliers are also reviewed annually and before new contracts are established. All wood sourced by Montes del Plata and Veracel is either FSC or PEFC certified or meets the FSC

Controlled Wood standard or PEFC due diligence requirements, minimizing the risk of controversial or illegal wood entering the production units.

For non-certified wood, geolocations are verified against satellite maps to verify the stated origin and to ensure the area or plot is deforestation free. Montes del Plata and Veracel follow all legal guidelines and labor practices. Suppliers must adhere to the Supplier code of Conduct and Requirements for wood suppliers. Breach of these requirements can result in contract termination.

Veracel has developed control measures for Controlled Wood with different indicators that need to be checked during the sourcing process. From the area Veracel is having very thorough assessment in place, and same applies for Montes del Plata.

Montes del Plata and Veracel do not use endangered species in their products. Certificates for FSC® and PEFC chain of custody are accessible, along with various other documents.

#### 4.2.1 Brazil specific details

In Brazil, the conservation of native vegetation and regulation of land use are primarily governed by the Forest Code (Law No. 12.651/2012). This legislation establishes two key conservation mechanisms:

1. Permanent Preservation Areas (Áreas de Preservação Permanente – APPs): These include riparian zones, steep slopes, hilltops, and other ecologically sensitive areas, where deforestation is strictly prohibited or highly restricted.
2. Legal Reserves (Reservas Legais): A portion of rural properties—ranging from 20% in the Atlantic Forest to 80% in the Amazon biome—must be preserved with native vegetation. Any deforestation in these areas must be legally authorized and offset through restoration or compensation mechanisms.

Conversion of native vegetation without proper environmental licensing is illegal. Clearance of native vegetation in Legal Reserves or APPs without authorization constitutes an environmental crime under the Environmental Crimes Law (Law No. 9.605/1998).

To regulate land use and ensure compliance, Brazil operates the Rural Environmental Registry (Cadastro Ambiental Rural – CAR), a mandatory digital registry for all rural properties. The CAR system provides georeferenced data on property boundaries, land use, and areas of native vegetation. Environmental agencies cross-check CAR data with satellite imagery to detect illegal deforestation.

Commercial use of timber from native forests is subject to strict controls under the National System for the Control of the Origin of Forest Products (SINAFLOR), managed by IBAMA (Brazilian Institute of Environment and Renewable Natural Resources). Timber harvesting in native forests must follow a Sustainable Forest Management Plan (Plano de Manejo Florestal Sustentável – PMFS), and any transport or trade of native timber requires a Forest Origin Document (DOF), ensuring full traceability. Additionally, State-level environmental agencies are responsible for issuing deforestation permits and conducting field inspections, with procedures differing slightly among Brazil's biomes and jurisdictions.

Lastly, compliance with Brazil's forest regulations is increasingly tied to international market access. Exporters of EUDR-regulated commodities must prove deforestation-free supply chains and legality of

production, both of which hinge on robust documentation, traceability systems like CAR/SINAFLO, and proof of geolocation and deforestation status post-December 31, 2020.

#### 4.2.2 Uruguay specific details

In 1987, the Forestry Law No. 15.939 was enacted with two primary objectives: the conservation of native forests and the promotion of forestry plantation resources. Uruguayan legislation strictly prohibits the felling of native forests and any activities that pose a threat to them, such as converting native forests into tree plantations, fodder crops, cereal or oilseed crops, urban areas, or subdivisions; and any other actions that involve eliminating native forests or jeopardizing their survival.

On a very limited scale, timber from native forests may be utilized for domestic purposes or commercial use as firewood, only with an approved management plan and legal authorization for logging from the General Forestry Directorate. Forestry plantations are required to comply with environmental impact regulations and adhere to the guidelines set forth by Uruguay's National Directorate of Environmental Quality and Assessment.

In Uruguay all new plantations require approval from the National Forest Directorate, part of the Ministry of Agriculture, and those larger than 100 hectares also need environmental authorization from the National Environmental Directorate, part of the Ministry of Environment. Harvesting activities are included in forest management plans approved by the relevant government organizations, thus do not require additional legal approval.

#### 4.3 Risk assessment

Our policies and those of the JOs act as a guiding framework, and we will update them regularly to meet the evolving requirements of the EUDR. This proactive approach not only safeguards our operations but also reinforces our dedication to environmental stewardship and sustainable practices. Please read more on policies from Appendix 3. Risk assessment process is also influenced by the country-level risk ratings determined by the EU Commission.

The validation process goes as follows:

- Conducting initial risk assessments of potential suppliers to ensure that they do not contribute to deforestation and comply with EUDR provisions.
- Verifying that suppliers have robust chain of custody systems and can provide evidence of sustainable forest management practices.
- Regularly monitoring supplier compliance through audits and site visits to ensure ongoing adherence to EUDR requirements.

Article 10 of the Regulation outlines 13 criteria (a-n) essential for a risk assessment, please see more [from the Regulation](#). These criteria addressed by those currently used in risk assessments required by

the EU Timber Regulation (EUTR), forest certification systems (FSC and PEFC), Joint Operations due diligence approach which complies with Stora Enso policy requirements.

#### 4.4 Risk mitigations

Article 11 of the Regulation mandates that any identified risks beyond negligible must be addressed through various procedures and measures before products are placed on the EU market.

For production in Brazil and Uruguay, the entire risk mitigation process must be implemented.

As mentioned previously this process is also influenced by the country-level risk ratings determined by the EU Commission. The need to conduct a full risk assessment (Article 10) and associated risk mitigation (Article 11) depends on the country's risk categorization – low-risk countries require only a simplified due diligence process, whereas standard and high-risk countries necessitate full risk assessments and corresponding risk mitigation measures.

Risk mitigation practices are an essential part of the entire supply chain and are applicable especially when the risk is assessed and even when negligible. The various types of risk mitigation measures throughout the supply chain, previously discussed, are summarized here for clarity. These measures are not specific to any assessed risk but rather help ensure that the incoming raw material is as low-risk as possible.

The risk mitigation process begins before sourcing any raw materials. Suppliers are thoroughly vetted to ensure they operate legally and meet the standards set by Montes del Plata and Veracel.

Initial risk mitigation involves checking the supplier's due diligence system and confirming compliance with local legal and tax regulations. If standards aren't met, no contract is established. The Supplier Code of Conduct's of all three companies, Stora Enso, Montes del Plata, Veracel, and the 'Requirements for wood suppliers' document are incorporated into contractual obligations. Contracts detail the species and origins of the wood, and the due diligence system is reviewed at least annually.

Montes del Plata and Veracel oversee harvesting and transport, reducing risk and minimizing the need for extensive measures. The focus is on the land and landowner.

When acquiring roadside wood or sourcing from independent suppliers, legal checks ensure the seller's property deed and ownership records are legitimate. Sellers must be free of debts (taxes) and encumbrances, and the land must be clear of debts and encumbrances (such as embargos, mortgages, and pledges). This due diligence is conducted by a legal advisor (notary) before acquisition.

Additionally, sellers are required to sign an affidavit confirming the stated origin and ownership of the wood. Since only plantation wood is used in production, the certification and management of these plantations are also included in the risk mitigation process. This process involves local checks to verify both the location and species of the wood. When purchasing standing forest, these local checks also include marking the exact area of the plantations on site.

If the wood is not PEFC or FSC Chain of Custody certified, the sourcing location will be verified either through satellite imagery or local on-site inspection to ensure that no deforestation has occurred and that the origins are accurate. Furthermore, the wood must be at a minimum, FSC Controlled Wood, which assists in mitigating any potential risks related to legality and deforestation.

The FSC system identifies five categories of unacceptable materials:

- Illegally harvested wood.
- Wood harvested in violation of traditional and civil rights.
- Wood from forests with high conservation value threatened by management activities.
- Wood from forests being converted to plantations or non-forest use.
- Wood from forests with genetically modified trees.

Additional documentation may be required if any of the previous risk mitigation measures indicate a higher-than-expected level of risk. In severe cases, contracts contain clauses that allow for termination in instances of non-compliance. All documents gathered are archived by the notary conducting the due diligence process.

#### 4.4.1 Montes del Plata specific actions

Prior to operations, the environmental and social impacts and risks of each of the activities are assessed, and preventive and mitigating measures are incorporated into the work procedures to ensure the standardization of activities.

MdP ensures compliance with local, national or international legislation applicable to forestry activities, including those that affect:

- Silvicultural and forestry work,
- Conservation of biodiversity, protected and endangered species (including CITES requirements),
- The conversion of forests to other uses,
- Health and employment issues related to forest workers;
- The rights of third parties over ownership, access, occupation and use,
- Payment of taxes and duties.

Uruguayan Government, Ministry of Livestock, Agriculture and Fisheries, has established Deforestation-Free registry. **It is an official certificate through which the owner of a rural or suburban register can know what the situation with respect to deforestation is.** Montes del Plata are collecting this information for their operations.

#### 4.4.2 Veracel specific actions

For 100% of the Veracel own wood and part of the wood from partnerships with rural producers (PPFs) that are certified by the FSC/PEFC have confirmation that these areas have not been deforested to establish the Eucalyptus plantations after 1995.

For new areas where land or wood will be purchased by Veracel (Market wood) and for non-certified partners (PPFs), there is a verification process done using satellite images from the past, starting in 1995, to check if the areas have been deforested after 1995.

Using information regarding properties passed on by the Business and Land Administration Management, an area conversion analysis must be carried out, checking whether the property complies with Brazilian legislation. Assessments are carried out on the condition of legally protected areas, such as Legal Reserves and Permanent Preservation Areas, in compliance with the Forest Code.

Veracel maintains an active channel of dialogue with the communities in its forestry operations through company and/or community representatives who are trained to record any incidents or questions from directly affected communities. Incidents and/ or complaints are recorded and processed by dedicated department for action by the operating units. Following forestry operations, Veracel holds an Action and Citizenship meeting with a committee of community representatives to understand perceptions of forestry activities and the effectiveness of mitigation measures and to identify the deviations and potential benefits arising from forestry operations in the community and surrounding area. In the event of negative impacts, Veracel acts promptly in cooperation with stakeholders to mitigate and/or compensate them for loss or damage. Information is recorded for monitoring and statistical purposes. Veracel maintains communication channels and regular visits to communities affected by timber transportation to ensure active dialogue on a regular basis.

In addition, Veracel has conflict, dispute and compensation procedures that applies to business and land management, forestry operations, wood supply, legal, compliance, planning, sustainability and asset protections/surveillance. They establish criteria for the systematic amicable or judicial resolution of conflicts, disputes and compensation related to rights of use, possession and control of land among Veracel and its neighbors, the local community, institutions, social movements and others, in order to maintain possession and control of these lands and ensure the continuity of Veracel's forestry operations.

Based on forest planning, which determines the annual calendar of activities, a schedule of social initiatives is created, including:

- Field visit to carry out the environmental, social and economic technical project;
- Citizenship actions and events before and after forest operations: active dialogue with communities directly affected by forest operations:
- Recommendations for dealing with identified impacts (analysis and deliberations) and services for communities;
- Monitoring of impacts identified during operations

Information is recorded for monitoring and statistical purposes. Veracel maintains communication channels and regular visits to communities affected by timber transportation to ensure active dialogue on a regular basis.

## 5. Reporting, auditing and recordkeeping

The Stora Enso EU Deforestation Regulation (EUDR) Due Diligence summary for Joint Operations will be reviewed and updated at the minimum annually, and more often if any changes are made to the Regulation that would require it. Expired revisions are archived for five years.

Stora Enso and Joint Operations undergo annual FSC and PEFC external audits, as well as internal audits on the processes. This due diligence system is planned to undergo 3<sup>rd</sup> party review during 2025 together with all company due diligence process descriptions.

Article 12 mandates that the Due Diligence System undergo an annual review, with records of any updates maintained for five years. Similarly, Article 9 stipulates that information must be archived for a minimum of five years from the time products are made available on the EU market or exported. For Due Diligence Statements, this archiving period starts from the date of submission. This information must be accessible upon request by the relevant competent authority (in Finland, this is Ruokavirasto – the Finnish Food Authority). Access to these documents is governed according to Stora Enso's Biomaterials division's internal data governance principles.

## 6. Effective date

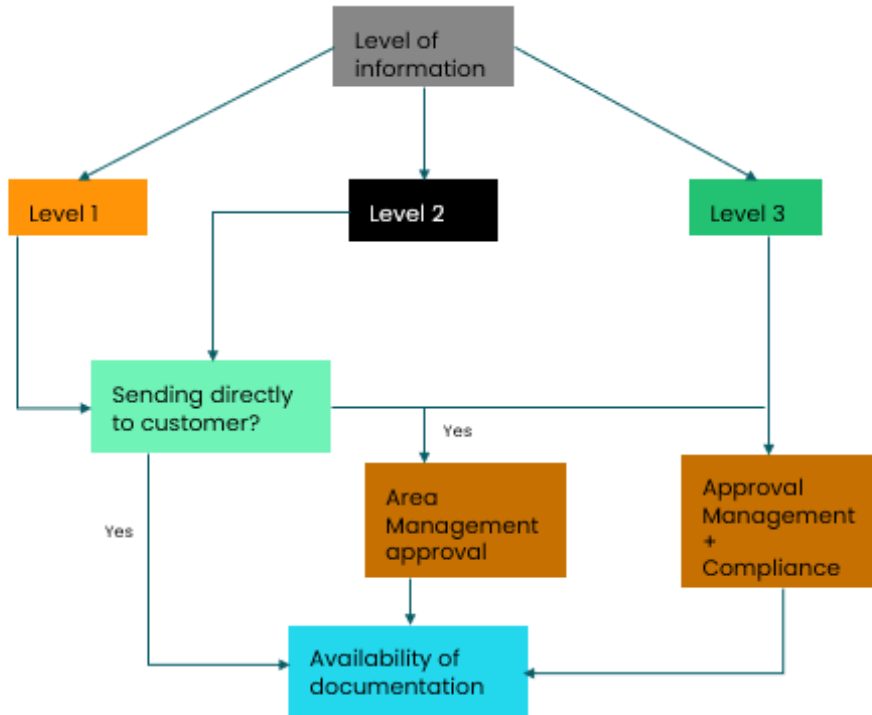
This document is initially approved on 24<sup>th</sup> June 2025 and effective as of said date. Any updates to this instruction shall be effective as of the date stated in the document change record below.

## 7. Document change record

Date	Version	Description of revisions/changes
24.6.2025	1.0	First version of the due diligence summary

Appendixes

Appendix 1. Picture of supporting information related to Veracel’s due diligence programme.



- Level 1**
- Environmental licence (Veracel)
  - CAR;
  - Environmental registers and Records – Federal and state (CTF, CEAPD, RAF Registration registry) etc.
  - Harvest Authorizations (RCFP/BA or CC/MG)
  - Post 2020 conversion analysis;
  - Communities (on map) neighbouring Veracel
  - FFIC reports;
  - Management system certificates (ISO 14001, FSC and PEFC)
  - Policies, guidelines, procedures

- Level 2**
- Documents not related to level 1 and that do not meet the criticality criteria
- Property documentation: Registration certificate, ITR and CCIR;
  - Information on Indigenous Land approval processes;
  - Information on processes and conflicts related property ownership;
  - Updated information from the country of origin (Brazil) regarding the Index of Corruption, violation/adherence to human rights, applicability of the law (compliance);
  - Terms of Commitment, Conduct Adjustment and other documents signed with the MP or public bodies
  - CEFIR;
  - Audit reports, Certification;
  - Due diligence reports on third-party properties (Annex III – PPF and MM);
  - Reports on compliance with License/RTGA conditions

- Level 3**
- Documents related to LGPD
  - Documents containing personal data of the employees (including employment data)
  - Documents containing financial information (bank details, for example)
  - Documents containing information regarding people’s health status (work accident)
  - Documents classified as sensitive/critical;
  - Licenses, registrations,
  - Registrations and environmental authorizations from third-parties (PPF and MM).

Explanations:

CAR: Rural Environmental Registry - stipulated in the Brazilian Forest Code;  
CTF: Federal Technical Registry - document issued by IBAMA (environmental agency Federal);  
CEAPD: State Registry of Potentially Degrading Activities issued by INEMA (environmental agency of Bahia);  
RAF: Forest Activity Registry: Issued by INEMA for companies in the forestry sector;  
ITR: Rural Land Tax issued by the Federal Revenue Service;  
CCIR: Rural Property Registry Certificate issued by INCRA (Institute of Colonization and Agrarian Reform): This certificate must be issued for all rural properties;  
PPF: Forest Producer Program - Promotion - partnership with third-party properties;  
MM: market timber (spot purchase of timber on the market from third parties);  
RTGA: Technical Environmental Assurance Report - Sent annually to INEMA with the results of the company's environmental performance

Appendix 2. Associated legislations in Latin-America



Stora Enso International Oy as operator

# Associated legislations in Latin-America

2025

The renewable materials company

## Land use rights



### Montes del Plata, Uruguay

In Uruguay, private rural property is demonstrated through registration in the Real Estate Registry and through legal documentation that proves the acquisition and ownership of the rural land. Ownership of a rural property is demonstrated through a public deed that must be signed before a notary public. This deed can be:

- A sales contract: If the land was acquired through purchase.
- A lease or loan agreement: If the property was acquired temporarily by contract.

This document must be signed by the parties involved and then registered in the Real Estate Registry.

Registration in the Real Estate Registry: Once the public deed of acquisition of the rural property has been formalized, it must be registered in the Real Estate Registry of the General Directorate of Registries (DGR). This registration is crucial, as it provides legal security to the property, allowing any third party to verify the legitimate owner of the land. Registry Certification: Once the property is registered, the owner can request a registry certification verifying ownership. This document is formal proof that a person owns rural land in Uruguay

- **Evidence: Ownership Titles (registry certifications)/ Leasing contracts / Approval of Forest Management Plan:** This documents are required for the approval of the Management Plan in DGF (Forestry National Office) and DINACEA (Environmental Ministry).
- **Evidence (third parties):** Framework contract between the supplier and Montes del Plata.



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## Land use rights

Veracel, Brazil

Real Estate Registry in Brazil is a legal process that ensures ownership and land use, confirmed through registration at the Property Registry Office, accompanied by the legal documentation that certifies the acquisition and possession of the land. The transfer of possession of rural property is formalized through a public deed, which must be signed before a notary and properly registered. At Veracel, the acquisition of land is handled based on four main strategies to ensure the legal and transparent acquisition and leasing of land, which are:

- **Land acquisition:** When acquiring property, rigorous procedures are followed to ensure that the property is free of legal and environmental liabilities.
- **Land leasing:** Leasing is carried out through a formal lease agreement, which is also registered at the Property Registry Office. This process ensures that the land use complies with legal parameters and follows environmental regulations.
- **Purchase of Timber from Partners:** For the purchase of timber from partners, the evidence includes partnership contracts and timber purchase and sale agreements. These contracts are formalized and registered in compliance with legal requirements.
- **Spot Timber purchase (SPOT):** The purchase of Spot timber also follows a set of strict legal and internal procedures, including specific purchase and sale contracts that ensure the timber acquired comes from legal and traceable sources. The evidence for this transaction includes formalized purchase and sale contracts for Spot timber, which detail the conditions and commitments involved.

- **Evidence on land acquisition:** Ownership titles (registration certificates) recorded in the Property Registry, along with the contract signed by the parties involved and subsequently registered at the Property Registry.
- **Evidence on land leasing:** Lease agreement registered at the Property Registry Office, along with any mortgages, and the property registration certificate.
- **Evidence on purchase:** "Private Timber Purchase and Sale Agreement and Other Arrangements" registered at the Property Registry Office, along with mortgages, property registration certificates, and internal procedures.
- **Evidence on purchase (SPOT):** "Private Market Timber Agreement" registered at the Property Registry Office, along with mortgages, property registration certificates, and internal procedures.

3

## Forest Management



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Montes del Plata, Uruguay

Forestry legislation in Uruguay requires that a Forest Management Plan must be approved by the Forestry Authority (DGF "General Forestry Office" / Agriculture and livestock Ministry) and DINACEA ("National Office of Environmental Quality and Assessment" / Environmental Ministry) before planting and then you are authorized to harvest (DINACEA for plantations post 2005). The Management Plan considers, among other things, production areas with plantations and measures for the protection of natural areas, biodiversity and control of forest fires and pests.

- **Evidence:** Evidence: Approved Forest Management Plan.
- **Evidence:** Safety, Occupational Health Policy, Sustainability Policy, FSC® and PEFC Forest Management Certification / Wood purchase and supply policy of Montes del Plata

Veracel, Brazil

In Bahia, the legislation requires obtaining an environmental license for the implementation and operation of forestry enterprises, as well as the registration of cutting of forests planted for harvest. Both processes must be carried out with the Institute of the Environment and Water Resources of Bahia (INEMA), which issues the necessary authorizations to ensure that the activities comply with the state's environmental standards.

In addition, Veracel has the Forest Management Plan, which is a public document and is available on the company's website. This plan details all stages of forest management and the applicable monitoring programs, ensuring transparency and the company's commitment to sustainable and responsible practices in the management of its forests.

- **Evidence:** Environmental licenses, the RCFP (Planted Forest Cutting Record) and forest management plan. FSC, and PEFC certificates, along with periodic audits.

Note: FSC C116608, PEFC/02-31-298

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## Environment



**Montes del Plata, Uruguay**  
 The Forest Management Plantation Plan also considers unplanted areas: natural pasture and native forest, watercourses and biological corridors for the conservation of native flora and fauna, biodiversity, and other sensitive areas such as wetlands.  
 These aspects ensure that forest plantations are managed sustainably, balancing timber production with environmental protection and biodiversity conservation.

- **Evidence:** Forest Management Plan / Sustainability Policy / Safety, Occupational Health, Policy / FSC\* and PEFC Forest Management Certification / Wood purchase and supply policy of Montes del Plata

Note: FSC C116608, PEFC/02-31-298

**Veracel, Brazil**  
 Veracel adopts an integrated approach to environmental preservation, maintaining protected and non-protected areas under current legislation. The ratio between the area planted with eucalyptus and the protected natural area is 1 hectare of plantation for every 1 hectare of protected natural area, evidencing the company's commitment to environmental conservation.  
 Since 1994, Veracel has implemented the Atlantic Forest Program, an ecological restoration program aimed at recovering degraded areas and preserving the region's biodiversity. In addition, the company carries out monitoring programs, such as fauna and flora and water resources located in its areas.  
 Veracel also has internal goals focused on reducing water consumption in industrial production and reducing atmospheric emissions, contributing to the sustainability of its operations and minimizing environmental impact.

- **Evidence:** Forest Management Plan, Business Plan, Certifications: FSC, PEFC and ISO 14.001 (Environmental Management System).

5

## Labour Rights



**Montes del Plata, Uruguay**  
 Montes del Plata's policies and conduct are developed within a framework of respect for Labor Rights and compliance with applicable national and international labor regulations. We have control mechanisms to ensure legal compliance of our own and contractors' workers.

- **Evidence:** Code of Ethics and Conduct of MdP / Safety, Occupational Health, and Sustainability Policy / Suppliers Code of Ethics and Conduct of MdP / Wood purchase and supply policy of MdP / FSC\* and PEFC Forest Management Certification

Note: FSC C116608, PEFC/02-31-298

**Veracel, Brazil**  
 Veracel develops its policies and practices within a framework of respect for labor rights, in compliance with applicable national and international regulations. The company has control mechanisms in place to ensure legal compliance for both its own workers and business partners.

- **Evidence:** Third-Party Management Procedure, Code of Conduct, SSMA (Health, Safety, and Environmental Management) Manual for third-party companies, and Management Policy.

6

## Indigenous People’s Rights



**Montes del Plata, Uruguay**  
 In the Uruguayan territory there are no organized indigenous communities living with their traditions and beliefs. There are descendants inserted in the society. Uruguay officially recognized indigenous peoples in its Constitution in 2004, with the reform of Law No. 18,140. This reform explicitly recognized indigenous peoples as subjects of rights and reaffirmed the State’s commitment to the preservation of their cultures, languages and traditions.

**Veracel, Brazil**  
 Veracel follows the principles and criteria defined by the FSC and PEFC certifications, in addition to complying with Brazilian legislation and international agreements and treaties to which Brazil is a signatory. The company also supports actions in indigenous communities, respecting their traditions and rights, promoting sustainable development, and maintaining continuous dialogue with local populations.

• **Evidence:** FSC and PEFC certifications, Human Rights Manifesto, Veracel’s Sustainability Report, which details the company’s actions and commitments related to the rights of indigenous peoples and local communities.

Note: FSC C116608, PEFC/02-31-298

## Human Rights



**Montes del Plata, Uruguay**  
 Montes del Plata’s code of ethics and conduct establishes to respect and protect the rights of all people involved in its operations. It has a Complaints Channel managed by a multidisciplinary team, where anyone can report acts contrary to the Code of Ethics and Conduct, with the company’s commitment to investigate and punish any act contrary to the provisions of the Code of Ethics.

**Veracel, Brazil**  
 Veracel adopts a Code of Ethics and Conduct that establishes the company’s commitment to respect and protect the rights of all people involved in its operations. The company has a Whistleblowing Channel, where anyone can report acts contrary to the Code of Ethics and Conduct. Veracel undertakes to investigate and punish any act that violates the established rules.

• **Evidence:** Montes del Plata Code of Ethics and conduct / Suppliers Code of Ethics and Conduct of MdP

• **Evidence:** Manifesto on Human rights and Code of Conduct of Veracel

## Transparency and Anti-corruption



### Montes del Plata, Uruguay

Montes del Plata's Code of Ethics and Conduct establishes the fundamental principles that guide the conduct of all its employees. It considers, among others, the principle of Crime Prevention, under which conduct associated with corruption is expressly rejected. In order to transparently manage its relations with third parties, it establishes, as a general rule, the prohibition of giving and receiving gifts, specifying exceptional situations in which invitations or gifts may be given or received, provided that the established requirements are met, hiring of family members, work outside the company, etc.

- **Evidence:** MdP's Code of Ethics and Conduct.

### Veracel, Brazil

Veracel's Code of Ethics and Conduct defines the fundamental principles that guide the behaviour of all its employees. Among these principles is the Prevention of Crimes, which includes an explicit rejection of corruption. To ensure transparent management in relations with third parties, the company establishes, as a general rule, the prohibition of giving and receiving gifts, except in exceptional situations, as long as they meet the established requirements. The company also regulates matters such as hiring relatives and external employment.

- **Evidence:** Code of Conduct of Veracel

### Appendix 3. Policies for Joint Operations compliance

#### Related policies Stora Enso:

- Stora Enso offers a diverse array of policies and guidelines. Policies and guidelines creates a clear, consistent, and safe working environment.
  - Policies make sure everyone is treated fairly and knows what to expect—no favoritism or confusion.
  - They also provide legal Protection: They help companies stay compliant with laws and regulations, reducing the risk of legal issues.
  - Guidelines streamline processes so people aren't always reinventing the wheel—think of them as a playbook.
  - Everyone knows their responsibilities and what happens if they don't follow the rules.
  - Culture & Values: They reflect what the company stands for—ethics, professionalism, respect, etc.
  - Safety & Security: Especially for things like health, cybersecurity, or handling sensitive information, guidelines protect both people and the company.
- Link to Stora Enso's policies and guidelines: [Policies and guidelines - Sustainability | Stora Enso](#)

#### Related policies Montes del Plata:

- Montes del Plata Code of Conduct: [mdp\\_codigo\\_de\\_etica\\_en.pdf](#)
- Montes del Plata Supplier Code of Conduct: [CE\\_MdP - ENG a4 2019](#)
- Montes del Plata Sustainability policy (Spanish): [Políticas sostenibilidad\\_a3](#)
- Montes del Plata Wood Purchasing and Supply Policy (Spanish): [Políticas de compra y suministro\\_a3](#)

#### Related policies Veracel:

- Veracel's Code of Conduct : [Código de Conduta - Inglês II](#)
- Veracel's Supplier Code of Conduct : [Supplier-Code-of-Conduct-Veracel-2025.pdf](#)
- Veracel Policy: [política Suprimentos como documento 2.cdr](#)
- Link to all policies: [Download Center - Veracel Celulose](#)