Docusign Envelope ID: 44B6ADA3-A550-8D74-82F6-44C596838900

TRANSPARENCY ACT STATEMENT

MM FOLLACELL AS

1. Introduction

The Transparency Act came into force in Norway on July 1, 2022. The Act aims to promote respect for fundamental human rights and decent working conditions in the production of goods and services, and to ensure public access to information on how businesses handle negative consequences for fundamental human rights and decent working conditions.

Fundamental human rights refer to the internationally recognized human rights set out in, among other things, the UN Convention on Economic, Social and Cultural Rights of 1966, the UN Convention on Civil and Political Rights of 1966, and the ILO's core conventions on fundamental rights and principles at work.

Decent working conditions refer to work that respects the fundamental human rights mentioned above, as well as health, environment, and safety in the workplace, and that provides a living wage.

This is MM FollaCell AS's statement on our due diligence.

2. MM FollaCell AS Business and Organization

MM FollaCell AS is a pulp mill located in Follafoss, Norway, and is owned by an Austrian company called Mayr-Melnhof Karton AG. We produce pulp with various specifications. The main input variables for production are mainly certified raw materials of wood (timber and sawmill chips) and energy. The products are sold in Europe and Asia. The products are transported by ship to a terminal in Europe, and further transport is tailored to individual customers.

3. MM FollaCell AS Policies and Procedures for Protecting Human Rights and Decent Working Condition

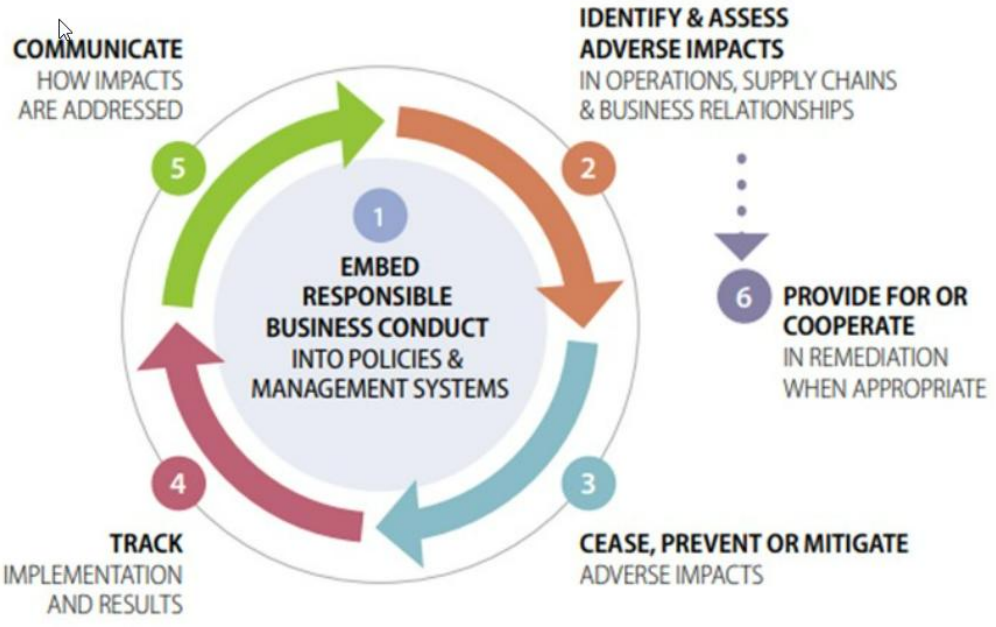
The company has its own policies and procedures to ensure that the necessary safety and quality requirements are met. In addition, we have a working environment committee (AMU), safety representatives, and an HSE manager. MM FollaCell AS is a member of the "Confederation of Norwegian Enterprise" (NHO). Freedom of association is a matter of course for us, and all employees can become members of a trade union. The company and the local trade unions are part of the collective agreements agreed between our industry in NHO and LO. The company fulfills its obligations through these agreements and complies with the Transparency Act and relevant Norwegian law.

Docusign Envelope ID: 44B6ADA3-A550-8D74-82F6-44C596838900

MM FollaCell AS has established a procedure that describes requirements and methods for conducting due diligence, what/how and when MM FollaCell AS should account for its due diligence, and how the company should respond to requests from stakeholders and the public. The procedure is 16 pages long. The procedure describes, among other things, examples of risks we should look for:

- Excessive use of overtime.
- Low wages that do not cover basic human needs.
- Lack of dialogue between employer and employees.
- Dangerous working environment. Pollution or accidents.
- Discrimination against employees.
- Forced labor.
- Child labor.
- Violation of the right to privacy.
- Negative impact on local communities.

The main obligation under the Act is to carry out due diligence, in accordance with the OECD Guidelines for Multinational Enterprises. The process for due diligence is as follows:



Docusign Envelope ID: 44B6ADA3-A550-8D74-82F6-44C596838900

Responsibility at MM FollaCell AS is anchored in our Code of Conduct, which is adopted by the board of Mayr-Melnhof Karton AG and applicable to the entire MM group. Here, MM FollaCell AS commits to responsible corporate governance based on the principles of integrity, legality, honesty, and transparency. In addition, MM FollaCell AS's working environment committee has confirmed the company's obligation to follow OECD's recommendations and guidelines for business and contribute to sustainable development.

If anyone suspects that we or our suppliers are acting improperly with regard to working conditions and human rights, we encourage anyone who wishes to access documents from MM FollaCell AS to contact us, and we will do our best to respond to their requests in a timely and efficient manner. We can be reached at the email address: post.follacell@mm.group We note that a request for information may be rejected if:

- The request does not provide sufficient basis for identifying what the request concerns.
- The request is obviously unreasonable.
- The requested information concerns information about someone's personal circumstances.
- The requested information concerns information about technical devices and procedures or other operational or business matters that would be of competitive importance to keep confidential for the information concerned.

4. MM FollaCell AS's Suppliers

MM FollaCell AS has approximately 500 suppliers who supply goods and services.

MM FollaCell AS's purchases can be roughly divided into two categories:

- Inputs used directly in production. The largest are wood/chips, electricity, and chemicals.
- Goods and services for the operation and maintenance of machinery/equipment and buildings. This includes machinery related to investments.

79% of our purchases were made from Norwegian suppliers in 2025, with the rest mainly from Sweden, Finland, Austria, the Netherlands, Switzerland and Italy.

Docusign Envelope ID: 44B6ADA3-A550-8D74-82F6-44C596838900

5. Due Diligence - Actual Negative Consequences or Significant Risk of Negative Consequences Revealed Through Due Diligence

MM FollaCell AS has taken a risk-based approach to due diligence in accordance with the intentions of the Transparency Act.

We base our mapping and due diligence on known information about the nearest supplier, our own investigations, information from the internet, and publicly available information.

In 2023, a questionnaire was sent to almost all suppliers. Very few suppliers responded to these. We have not sent out any new questionnaires since then. We are working to find better ways to do this. This year, we have made a rough assessment of all suppliers to prioritize who we should focus on next. The criteria here have been the size of the purchases, industry and geographical area. In this case, we have focused most on suppliers from whom we have had purchases of over NOK 100,000 in 2024.

The risk analysis shows that three industries are of particular interest for further follow-up:

- Logistics/distribution is generally associated with high social risk, due to environmental aspects and the occurrence of social dumping. Our assessment is that several of the suppliers in this category represent medium risk. This applies especially to the transport of goods by road and by boat.

- Chemicals, chemical industry additives. The chemical industry and its value chain can sometimes represent high social risk. There is a risk of dangerous working conditions related to production, and a general risk of poor rights for workers.

- Electrical components and machine parts. Here, there may be sub-suppliers and perhaps some levels of sub-suppliers. There is a risk that some of this is produced in countries where there are few or no HSE regulations, where child labor occurs, and where wages can be very poor. This is very difficult to investigate.

All wood purchases are FSC / PFSC certified, which includes commitments regarding fundamental human rights and decent working conditions and is therefore not considered a high-risk category.

Through our analysis, we have not found any negative findings in our supply chain or in our own company, but the above-mentioned areas include possible risks. We have identified a few suppliers who are themselves in the process of investigating their sub-suppliers.

Docusign Envelope ID: 44B6ADA3-A550-8D74-82F6-44C596838900

6. Measures to Stop Actual Negative Consequences or Limit Significant Risk

The due diligence assessments are a continuous process, and we will periodically conduct a new review of the suppliers. We are working on updating our routines and procedures with revised requirements for suppliers. Among other things, our supplier agreements shall include the following clause: “The [counterparty] undertakes to comply with MM Group´s respective applicable Code of Conduct.”. This is to best ensure that suppliers are qualified in accordance with the Transparency Act.

Training for relevant employees regarding the Transparency Act and the company’s requirements for responsible supply chains will be carried out during 2026.

7. Signatur

This statement is signed by the board and managing director of MM FollaCell AS.

Date: 09.06.26

DocuSigned by:
Michael Petschacher
3005726EBA364BA...
Michael Petschacher
Chairman of the Board

DocuSigned by:
Odd Morten Aalberg
EE9F32ACE0FB49F...
Odd Morten Aalberg
Managing Director

Signed by:
Katja Tuomola
20ADA25697CE434...
Katja Tuomola
Board Member

Signed by:
Arnt Espen Skatland
50C57E841D014B9...
Arnt Espen Skatland
Board Member

Signed by:
Kaia Andersson Jenssen
6EE1059BCD3C414...
Kaia Andersson Jenssen
Board Member

Signed by:
Jørgen Thunsør
0CF5C069C0754BC...
Jørgen Thunsør
Board Member