

## UPM Position Statement on the Regulation (EU) 2023/988 on General Product Safety

UPM-Kymmene Corporation is committed to ensuring the highest standards of product safety and compliance with applicable regulations. This statement outlines the position of our paper, pulp, plywood, timber, label stock, biofuels and biochemicals products (later products) regarding the Regulation (EU) 2023/988 on General Product Safety (GPSR), replacing since 13. December 2024 the previous General Product Safety, Directive 2001/95/EC, the Regulation (EU) 2023/988 requires that all [consumer] products on the EU market are safe. It establishes specific obligations for businesses of all sizes to ensure safe products. It is a safety net for products or risks not regulated in other EU legislation and applies to all kinds of potential health hazards.

UPM companies mostly sell intermediate materials, not directly to consumers, except for a few products like timber, labels, plywood, or copy paper. This means that EU regulation 2023/988 usually doesn't apply to our products. It's the responsibility of consumer product manufacturers to conduct thorough risk assessments. However, we have ensured that our products are safe for health and safety when used as intended.

### Product Identification and Traceability

- Each batch of our products is marked with unique identification number to ensure traceability
- Our products are accompanied by clear instructions and safety information, where applicable, in a language easily understood by customers

## **Products under specific safety provisions**

Specific safety provisions like EU chemicals Regulation (EC) No 1907/2006 (REACH) or The EU Framework Regulation for food contact materials, (EC) No 1935/2004 are applied to some of our products. UPM label, packaging or barrier paper grades, pulp products and selected label stock grades are manufactured and tested safe and compliant for food contact use. UPM biofuels and biochemicals products are registered under Regulation (EC) No 1907/2006 and classified according to Regulation (EU) No 1272/2008 (CLP) as relevant. As requested in the chemical or food contact material regulations or standards we provide safety data sheets or Declaration of Compliance documents for products with specific safety provisions.

## **Consumer Safety and Communication**

- We have established communication channels, including a telephone number and electronic address, to enable consumers or customers to submit complaints and report any safety issues
- We maintain an internal register of complaints, product recalls, and any corrective measures taken to ensure ongoing compliance and consumer safety

## **Market Surveillance Cooperation**

- We cooperate fully with market surveillance authorities to ensure the safety of our products
- In the unlikely event that a safety issue is identified, we will take immediate corrective measures, including product withdrawal or recall if necessary, and inform the relevant authorities and customers promptly

## **Conclusion**

UPM-Kymmene Corporation is dedicated to maintaining the highest standards of product safety and regulatory compliance. We will continue to monitor and review our processes to ensure ongoing adherence to Regulation (EU) 2023/988 and to safeguard the health and safety of our customers and consumers.