Livonia print

LIVONIA PRINT STATEMENT ON COMPLIANCE WITH THE EU DEFORESTATION REGULATION REQUIREMENTS

The EU Deforestation Regulation (EUDR) (EU) 2023/1115, as amended by Regulation (EU) 2025/2650, requires that products listed in its Annex I, including certain wood-based products such as paper, are deforestation-free and legally produced. It applies from **30 December 2026** to large and medium-sized companies and from 30 June 2027 to micro and small companies.

Livonia Print is a **non-SME** company that manufactures books classified by default under **HS Chapter 49**. Printed products of Chapter 49 are excluded from Annex I of the EUDR and are not subject to its obligations. A customer requiring classification under another heading, such as HS 48 (paper and paperboard products), shall state this before placing the order. **In the absence of such notification, Livonia Print will classify and register the product under HS Chapter 49**.

With respect to HS 48 products, Livonia Print acts as a downstream operator located at Jūrkalnes street 15/25, Riga, Latvia. Our production relies solely on paper sourced from European mills. Under the amended Regulation, upstream operators (companies placing relevant products on the EU market for the first time) are responsible for carrying out due diligence, collecting the required information, including geolocation data where applicable, and submitting due diligence statements (DDS) to the EU Information System. **Downstream operators and traders are not required to carry out due diligence or submit DDS**.

Only the first downstream operator or trader, meaning the first buyer of a relevant product from an upstream operator or a micro or small primary operator, is required to collect and retain the relevant DDS reference numbers or simplified declaration identifiers for at least five years. **Subsequent downstream operators and traders are not required to collect these reference numbers or identifiers.** Based on our supply chain information, Livonia Print is not the first downstream operator and is not required to proactively request DDS reference numbers or declaration identifiers or independently investigate its position in the supply chain. The same principle applies to Livonia Print's customers.

Livonia Print conducts an annual risk assessment of all its suppliers as part of its supplier management procedures. Cooperation continues with suppliers assessed as low risk, while alternatives are sought for suppliers assessed as high risk. Livonia Print also maintains traceability procedures within its factory. For all products, including HS 48 products, Livonia Print collects and retains **information on its direct suppliers and direct customers for at least five years**, and ensures traceability by identifying all papers used in production. If Livonia Print becomes aware of substantiated concerns or other relevant information indicating that a product may not comply with the EUDR, it will notify the competent authorities and its customers in accordance with the EUDR.

Customers making HS 48 products available on the market without changing the relevant Annex I product classification act as traders. Their obligations are limited to keeping the required information on their direct supplier and their direct customers for at least five years, and notifying the competent authorities and their customers if they become aware of potential non-compliance. This information can be evidenced by invoices or other accompanying documentation.

16.11.2026.