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DATE: 07/29/2024

SUBJECT: Forest Stewardship Council Core Labor Requirements

REFERENCE: Fedrigoni Special Papers North America, Inc.
Mohawk – Part of the Fedrigoni Group
Cohoes, NY USA

As a Forest Stewardship Council (FSC) Chain of Custody certificate holder (Registration code NC-COC-000668), Fedrigoni Special Papers North America (FSPNA) has adopted and implemented a policy statement confirming our adherence to the FSC Core Labor Requirements. We chose to make this policy statement available to all of our stakeholders on our website and it covers:

A. Child Labor

- a. FSPNA is not employing workers below the age of 15.
- b. No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulations.
- c. FSPNA prohibits the worst forms of child labor.

B. Force and Compulsory Labor

- a. Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.
- b. There is no evidence of any practices indicative of forced or compulsory labor, including but not limited to, the following:
 - i. Physical and sexual violence
 - ii. Bonded labor
 - iii. Withholding of wages/including payment of employment fees and/or payment of deposit to commence employment
 - iv. Restriction of mobility/movement
 - v. Retention of passport and identity documents
 - vi. Threats of denunciation to the authorities

C. Discrimination in Employment and Occupation

- a. Employment and occupation practices are non-discriminatory.



D. Freedom of Association and Right to Collective Bargaining

- a. Our workers are able to establish or join worker organizations of their own choosing.
- b. FSPNA respects the full freedom of workers' organizations to draw up their constitutions and rules.
- c. FSPNA respects the rights of workers to engage in lawful activities related to forming, joining, or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.
- d. FSPNA negotiates with lawfully established workers' organizations and/or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.
- e. Collective bargaining agreements are implemented where they exist.

Fedrigoni Special Papers North America Inc.

A handwritten signature in dark ink, appearing to read "Brenda S. Stokes". The signature is written in a cursive, somewhat stylized font.

Brenda S. Stokes
Vice President, Human Resources