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DATE: 11/09/2026

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.

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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.

Giulia Fermi
Global HRBP, FSPNA