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Guideline for the Supply of Paper Mills of the DS Smith Group with Recovered Paper.

This paper applies for the following plants:

DS Smith Paper - Aschaffenburg Mill – Germany



DS Smith Paper – Lucca Mill – Italy



DS Smith Paper - Witzenhausen Mill – Germany



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Foreword

DS Smith is one of the leading suppliers of corrugated cardboard and plastics in Europe. The Group is divided into the following divisions: Plastics, Paper, Packaging and Recycling.

At DS Smith, recovered paper is an important raw material for the production of packaging for our customers. The segment contributes decisively to our vision of becoming the leading

Closed Loop Recycling



provider

of recycled packaging in Europe and forms an important component in the realisation of our "closed loop" concept. Due to increasing environmental awareness throughout the supply chain and the resulting increase in demand for recycled products, our closed-loop recycling model is a key differentiator for our customers in the consumer goods industry and trade and commerce sectors, who are faced with ever growing environmental obligations.

Thanks to the Plastics, Paper, Packaging and Recycling divisions, we can keep the full cycle of recycling our products in-house, which we also advertise as "Box to Box in 14 days".

As part of the Group, DS Smith Recycling is responsible for the central supply of paper mills with the raw material recovered paper (PfR - Paper for recycling).

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For reasons of efficiency, DS Smith Recycling is also offering this service to third party recovered paper processors not associated with DS Smith, who are making use of this input material.

The procurement of recovered paper is devised to ensure supply security, as well as optimal control of origin and quality. As a general quality standard, the "list of European standard types and their qualities" (EN 643) always applies in its current version.

The present guideline aims to establish a general framework of conditions for recovered paper delivered to the participating European recovered paper processing mills of our company. These primarily include:

- Aschaffenburg Mill – Germany
- Lucca Mill – Italy
- Witzenhausen Mill – Germany

In the medium term, the present paper is set to become the standard for all DS Smith Containerboard Mills.

Due to the variety of cultural and geographical differences in the individual DS Smith plants, this guideline is divided into a general section, as well as plant-specific valid sections that are available as other related, separate documents.

DS Smith Recycling is a pan-European organisation. Please refer to the plant-specific section for the relevant, competent organisation.

Scope / validity:

This document is a guideline for supplying the above-mentioned paper mills, jointly applicable with the respective plant-specific supplementary guideline.

This document and the jointly applicable documents and plant-specific supplements are valid in their respective, current version. The current, valid version is to be requested from DS Smith Recycling.

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General Section

1) Basic recovered paper quality requirements

Our requirements for recovered paper are based on the latest versions of the European standard EN 643 (European list of standard grades of recovered paper), under observation of currently valid standards and guidelines (see item 6)

a) Unwanted materials

Recovered paper should always be delivered free of unwanted substances. Such materials are unsuitable for the production of paper, cardboard and paperboard. In detail:

Non-paper components

Non-paper components are any foreign materials in recovered paper, which do not form part of the product and can be separated beforehand:

- Metals
- Plastics
- Glass
- Textiles
- Wood, wood products
- Sand, building materials and garden waste
- Synthetic materials and papers

Paper, paperboard and cardboard types not suitable for recycling:

DS Smith also rejects any paper, paperboard and cardboard that has been processed and/or treated in such a manner as to render them unsuitable for normal or standard treatment plant as a raw material for the manufacture of paper, paperboard and cardboard, or the excessive presence of such materials, which may render the entire recovered paper delivery unusable.

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The most common examples in the area of paper and cardboard are:

- Recovered paper from multicomponent or mixed supply with any degree of mixing with other groups
- Liquid packaging for juices, milk and wine, etc.
- Coatings (extrusion coatings, eg PE coating; lamination; metallisations, e.g. aluminum laminates)
- "Wet-strength" recovered paper characteristics (e.g. bottle labels, posters or silicone paper)
- Recovered paper contaminated with wax or tar
- Paper bags with inlays
- Hard-core sleeves
- Wallpaper and decorative papers
- Cover materials, such as paper sheets for covering furniture during renovation and repainting works
- Carbonless/heat transfer papers
- Paper contaminated with PCB from archives of libraries, offices, etc.
- Edge protection
- Molded pulp cardboard
- Thermal print/carbonless paper (NCR)
- Burnt paper

b) Prohibited materials

All materials that are in any way hazardous to health, safety and the environment, such as:

- Medical waste/hospital waste
- Other hazardous waste
- Used hygiene products
- Organic, biological waste (incl. foodstuffs)
- Bitumen
- Toxic waste
- Materials with pests and mould

Any other substances, as well as anything that may cause damage to production equipment or trigger production problems, as well as substances that are excluded due to legal regulations.

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c) Recovered paper moisture content

DS Smith accepts a maximum average moisture content of 10% of the total load (air-dry mass).

d) Composition as per type definition

The delivery must match the type ordered. This is governed by the type definition as per EN 643, and any separate agreements.

e) Bale dimensions

To ensure some extent of traceability of the recovered paper bales that are delivered, we recommend bale labelling (CEPI / FEAD / ERPA or customer-specific code) to be carried out by the supplier. In this regard, we support the system of the European waste management and paper industry. For more information, see <http://www.recoveredpaper-id.eu/>.

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2) Recovered paper delivery evaluation

a) Proportion of unwanted materials

All paper types are graded by quality according to EN 643. Limits and recovered paper types used are outlined in the plant-specific section.

b) Humidity, age, odour and rotting

The measurements of the moisture are performed by way of a suitable measuring device (eg. EMCO AP 500).

Age, smell, rot and possible heat generation are determined in a visual and sensory manner by the incoming goods inspection.

The moisture content is determined by a minimum of 10 measurements at different locations distributed across the entire load. The measured data is recorded and made available.

Moisture ingredients that are in breach of the tolerance range defined under c) above are deducted from the total weight of the load.

c) Composition

The paper types are visually checked for composition in accordance with EN 643 and any separate agreements, and graded accordingly.

d) Bale quality

The bale condition must permit safe and cost-efficient handling, transport and storage. We require rectangular and well-compacted bales.

The following requirements for bale quality are the optimal conditions for DS Smith Paper Mills, and apply as target values for all suppliers:

- Density must not fall below a mass of 500 kg/m³; weight should be at least 400 kg/bale.
- The wiring of the bales should consist of at least 4, preferably 5 parallel (non-crossing!) wires at regular intervals to ensure solid bales.
- To avoid injury to people and objects, the wire ends should not stick out.
- Generally speaking, ties using flat metal strips, galvanised wire or plastic straps are not permissible, unless expressly agreed otherwise.
- Deliveries of bales that were not compacted using a classic horizontal baler must be agreed in advance on a per-case basis.
- Bales compacted in balers using discs are generally not permissible (eg Bale Tainer). Such bales do not meet our stability specifications.

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The minimum and maximum dimensions of the bales are contained in the respective plant-specific part

The bales in a load should be as uniform as possible, and stacked evenly on the bed of the truck, so as to avoid delays in unloading.

A clearance of 15 cm must assured between the upper edge of the load and the lower edge of the tarpaulins/roof arch.

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3) Rejection limits

The delivery will be accepted once compliance with the above requirements and criteria has been established.

Rejections are issued in the case of

a) Unwanted materials

Deliveries with an excessive proportion of unwanted materials (EN643).

b) Prohibited materials

Deliveries containing even minute components of illegal materials cited above (1)b).1)b)

The presence of hazardous components in recovered paper supplies to DS Smith plants result in an extended rejection process for the delivery, including joint inspection of the delivery with the supplier. DS Smith Recycling will strive to trace the origin of such materials to the source company, and undertake all necessary steps.

This seemingly strict rule is intended to protect our suppliers, our employees, as well as the end users of DS Smith products.

c) Deviation from type

Deliveries, where the delivered type does not match the quality stated on the delivery note.

Alternatively, the delivery may be regraded to the corresponding type in its entirety in consultation with the supplier, unless there are other reasons not to process the load.

Partial changes of the type for a delivery are not permissible.

d) Humidity, age, odour, rotting

Deliveries with specific abnormalities and/or exceeding the agreed limits. These include mould and/or atypical odours.

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e) Ball condition

Health and safety are primary aspects of our corporate governance. If the bale condition is considered unacceptable by the unloading staff in light of a primary visual inspection, the delivery is rejected to ensure safety in unloading and storage.

f) Documentation of complaints or rejection

- Complaint report
- Moisture measurement data
- Digital images to clarify the complaint, where appropriate

4) Delivery documentation

a) Delivery note:

A delivery note with the following information is required for deliveries to DS Smith plants:

- Name of supplier
- DSSR order number
- Date of delivery and, if necessary, delivery time window
- Type description in accordance with EN 643
- Number of bales
- Vehicle registration number (trailer/tractor)

b) Other documents:

For cross-border traffic, the following documents must be carried and completed on-site:

- Annex VII
- CMR document

Furthermore, all local regulations and laws regarding the documentation must be taken into account.

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5) Management systems

Management systems support us in defining our goals, and are necessary for the management and control of our processes. They are thus vital to the successful achievement of goals.

We document our performance and our quality standards for our business partners on the basis of our management systems.

For recovered paper suppliers, the foundation of their actions and quality standards must also be supported by evidence such as:

- Certified waste management company
- ISO 9001 : 2000
- EMAS
- In-house, documented systems.

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6) Applicable guidelines and standards

a) EN 643

b) Plant-specific supplementary guidelines for:

- DS Smith Paper Aschaffenburg (DSS PfR G AB)
- DS Smith Paper Witzenhausen (DSS PfR G WH)
- Lucca Italy (DSS PfR G LC)

b) CEPI Guidelines

- Guidelines on responsible sourcing and supply of recovered paper.
- Recovered Paper Quality Control Guidelines.
- Best Practices, Recovered Paper Baling Conditions.
- Best Practices for the Global Inspection of Recovered Paper.
- Guidelines for paper mills for the control of moisture content in recovered paper.
- Guidelines for paper mills for the control of the content of unusable materials in recovered paper.
- Good Manufacturing Practice for the Manufacture of Paper and Board for Food Contact.
- Industry Guideline for the Compliance of Paper & Board Materials and Articles for Food Contact.