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Information Letter on the EUDR Deforestation Regulation (EU) 2023/1115

Subject: Current status of implementation

Dear Customers,

the European Deforestation Regulation (EUDR) introduces new requirements for the traceability and sustainability of certain raw materials - including **natural rubber**, which is used in some of our products.

We would like to provide you with a transparent update on the current status of our implementation:

Important update: Exemption for seals and rubber conveyor materials

We have some good news for our customers regarding the scope of the regulation:

As part of the latest amendments to the annexes to the Regulation, finished rubber products falling under the 4016 tariff heading (including rubber seals, plugs and static seals) and rubber conveyor materials under heading 4010 have been removed from the annex to the EUDR.

Exemption for finished products:

Seals manufactured from natural rubber and rubber conveyor materials are no longer considered to be affected products within the meaning of the EUDR. The documentation requirements for these products therefore no longer apply.

Raw materials remain within the scope:

Unprocessed rubber compounds, as well as pure sheets, rolls and mats, remain within the scope of the EUDR as raw materials.

Affected materials

After further review, we can confirm that the following materials in our product range contain natural rubber and are therefore affected by the EUDR:

- ElaQprem Basic (EPDM / NBR / CR)
- ElaQprem Standard (EPDM / NBR / CR)
- ElaQprem EPDM E215 / ElaQprem EPDM E220
- ElaQprem SBR
- ElaQprem LBM (EPDM light, NBR light, CR light, SBR light)
- ElaQprem Para
- ElaQprem wear protection
- ElaQprem Butyl
- ElaQprem Mats (fine rib / wide rib / ribbed mat / studded mat / electrical insulation mat, hammer finish mat))
- Other Mats: Cobra and Ring mat
- Tesnit qualities

Status of supplier confirmations

We have already received the required confirmations of EUDR compliance from the majority of our suppliers. These include:

- Proof of raw material origin
- Confirmations of deforestation-free sourcing
- Traceability documentation

Some responses are still pending. We are in close contact with the respective suppliers to obtain the complete documentation as soon as possible.

Our own implementation – current status

Full implementation of the EUDR within our company is still in progress.

We are currently working intensively on:

- Establishing and maintaining traceability documentation
- Coordination with suppliers and upstream suppliers
- Adaptation of internal processes and systems
- Preparing for digital submission via the EU Deforestation Platform (EDP)

Regulatory developments

The EUDR launch dates remain unchanged:

- For medium-sized and large companies: Effective December 30, 2026
- For micro and small companies: Effective June 30, 2027

Although these dates have been set for some time, key technical and organizational elements of the EU have still not been fully implemented.

These include, in particular:

- the EU Deforestation Platform (EDP), which is not yet fully operational
- Lack of final guidelines on geolocation, risk analysis, and regulations for smallholder farmers
- the fact that several Member States have yet to designate national supervisory authorities
- the integration into the EU customs systems, which has not yet been completed
- the non-finalized list of high-risk countries

These outstanding issues have a significant impact on practical implementation.

Since key technical and organizational elements of the EU have still not been put in place, full implementation of the EUDR is currently objectively impossible.

We are preparing all internal processes and will issue the corresponding certifications only once the EU has established the necessary conditions for this.

As soon as new information or relevant developments regarding the EUDR become available, we will inform you without delay.

We thank you for your understanding and continued support. Should you have any questions, we will be happy to assist you.

Yours sincerely,

The Möller Team