



EUDR Management System

Nissha Advanced Technologies Europe GmbH |
Coniferous chemical wood pulp (HS code 47032100);
Paper strips (HS code 48239085)

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

CONTENTS

Introduction.....	4
Objective.....	4
Overview of the Due Diligence System.....	4
1. EUDR Due Diligence Management System	5
1.1. EUDR Policy.....	5
1.2. Assignment of Responsibilities.....	6
1.3. Training and Competence Assurance.....	6
1.4. Procedures and Documents	8
1.5. EUDR DDS Quality Control and Monitoring.....	8
1.5.1. Annual Internal Review, Audit and Reporting.....	9
1.5.2. Public Reporting	10
1.5.3. Complaints, New Information and Substantiated Concerns	11
1.6. Material Control & Segregation.....	12
1.7. Maintaining Records and Evidence.....	13
2. Scoping	13
2.1. Relevant Commodities and Relevant Products	14
2.2. Nissha Advanced Technologies Europe GmbH Facilities.....	14
2.3. Operator.....	15
2.3.1. Nissha Advanced Technologies Europe GmbH's EUDR roles and Responsibilities	16
2.3.2. Description of Nissha Advanced Technologies Europe GmbH's scenarios roles and responsibilities:.....	16
2.3.3. Continuous scoping exercise.....	18
Incoming Product	19
Outgoing Product	19
3. Information gathering	20
3.1. Collecting Supply Chain Information	21
3.2. Recording Supplier Information.....	23
3.3. Evaluating Documents and Information	23
3.3.1. Collecting Additional Information.....	23

Arbeitsanweisung
A3-AA-06
EUDR-Management-System

3.3.2. Revision of Supply Chain Information 24

3.3.3. Risk of Non-Compliance 24

Annex 1: Terms and Definitions 25

Annex 2: Abbreviations 29

Arbeitsanweisung A3-AA-06 EUDR-Management-System

Introduction

The Due Diligence Management System (DDMS) procedure outlines Nissha Advanced Technologies Europe GmbH procurement process concerning products under the EUDR (coniferous chemical wood pulp and paper strips). It includes activities such as purchasing and placing these products on the European Union (EU) market and exporting them from the EU market. The contents of the DDS procedure aim to meet the European Union Deforestation-free Regulation requirements (EUDR 2023/1115), established by the European Parliament and the Council on 31 May 2023, hereafter referred to as the Regulation.

Objective

The objective of this DDS procedure is to detail the due diligence process to be followed by Nissha Advanced Technologies Europe GmbH when sourcing and procuring relevant products to ensure compliance with the EUDR requirements. This DDS procedure intends to minimize any risks associated with Nissha Advanced Technologies Europe GmbH's sourcing and placing on the EU market of any relevant products from deforested areas and with the relevant legislation of the country of production (according to Article 2 in the EUDR). By following these procedures, Nissha Advanced Technologies Europe GmbH strives to comply with the EUDR requirements, ensuring responsible and sustainable supply chain practices.

Overview of the Due Diligence System

The DDS procedure at Nissha Advanced Technologies Europe GmbH considers a set of steps taken to minimize the risk of sourcing and procuring relevant commodities from deforested areas or which have not been produced in accordance with the relevant legislation(s) in the country of production.

This process includes the following:

- 1) Implement quality management;
- 2) Follow responsibilities as first operator;
- 3) Follow responsibilities as operator for export;
- 4) Follow responsibilities as trader; and
- 5) Submit a Due Diligence Statement (DDS) for every applicable operation.

The DDS procedure follows the process flow presented in Figure 1. The operational steps to implement this process flow are described in detail in the remainder of this procedure (Steps 1 – 5).

Figure 1: Overview of the DDS process steps



1. EUDR Due Diligence Management System

Nissha Advanced Technologies Europe GmbH recognizes that a robust and credible DDS is underpinned by a strong quality management and assurance system. This includes the creation of the responsible sourcing policy, general procedures in accordance with EUDR such as the assignment of staff responsibilities, documenting procedures, defining the scope of the due diligence system, training staff, etc.

1.1. EUDR Policy

Nissha Advanced Technologies Europe GmbH is committed to source deforestation-free and legal relevant products as clearly stated in Nissha Advanced Technologies Europe GmbH’s EUDR Policy:

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

Nissha Advanced Technologies Europe GmbH shall not place or make available on the EU market or export relevant commodities and relevant products, unless all the following conditions are fulfilled:

- 1) *They are deforestation-free (aligning with the definition set out in the EUDR Regulation);*
- 2) *They have been produced in accordance with the relevant legislation of the country of production;*
and
- 3) *They are covered by a due diligence statement.*

See EUDR Policy [<https://iml-specialist.com/compliance>]

1.2. Assignment of Responsibilities

To effectively operationalize the EUDR compliance, Nissha Advanced Technologies Europe GmbH has assigned the responsibility for different obligations of the DDS to the persons responsible within the organization. These responsibilities may include training and competency development, maintenance of documents and procedures, internal quality control and complaints, risks' assessment and mitigation and reporting, among others.

The overall responsible position for compliance with the EUDR is the Quality Manager from the Quality Department, who has the responsibility of overseeing the entire EUDR compliance process.

The appointed person should:

1. Be sufficiently informed about the impact of EUDR to understand and approve the decisions needed,
2. Have a deep understanding of the company's operations regarding its supply chain and the authority to drive necessary changes across the organization.
3. Competence to establish a strong relationship with supplier's points of contacts to enhance smooth communication among all stakeholders.

1.3. Training and Competence Assurance

Nissha Advanced Technologies Europe GmbH guarantees that those responsible for implementing the due diligence obligations are well-informed and trained about the requirements and processes necessary to comply with the regulation.

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

Training in the EUDR is provided to all staff who are either responsible for undertaking due diligence (information gathering, risk assessment, risk mitigation), submitting due diligence statements, and/or responsible for Nissha Advanced Technologies Europe GmbH's procurement responsibilities in alignment with the Regulation. Thereby ensuring that relevant employees have the necessary competence to carry out their assigned job and/or responsibilities.

The date of training, participant(s), and a brief overview of the topics covered are documented for all training sessions (Register / presentations). The training of new employees is documented by registration of the participant and the date of training (Register). Records of training and competence development activities are stored on file for a minimum of 5 years.

- **New staff:** Training new staff, as well as existing staff transitioning into new roles within the company, includes an introduction to this procedure and other relevant material and procedures *before* they begin their duties. Employees who change functions and have not yet been trained or made aware of EUDR requirements will be treated as new staff from a training perspective to ensure full compliance.
- **Existing Staff:** Training is conducted annually, or when specific training needs arise.
- **Co-manufacturing/outsourcing:** If/where Nissha Advanced Technologies Europe GmbH uses co-manufacturing or outsourcing and Nissha Advanced Technologies Europe GmbH has legal ownership of the product, training should be conducted as Nissha Advanced Technologies Europe GmbH will be deemed an operator or trader within the Regulation. Training is conducted, initially and when specific training needs arise to ensure that all participants have acquired the skills to follow the Nissha Advanced Technologies Europe GmbH EUDR Due Diligence Management System.
- **Direct suppliers:** Training direct suppliers can be a useful tool for information gathering risk mitigation.

Nissha Advanced Technologies Europe GmbH must ensure that relevant employees receive appropriate training in, at least:

- The requirements of the EUDR.
- The implementation of Nissha Advanced Technologies Europe GmbH due diligence system procedures.
- Risk assessment and risk mitigation (procedures).

Arbeitsanweisung A3-AA-06 EUDR-Management-System

- Methods for collecting and verifying geolocation data.
- Monitoring and reporting obligations and potential deviations.

See **Training Overview (Register)**

See **Attendance list (Register)**

1.4. Procedures and Documents

This document (Due Diligence System Procedure) forms the basis of Nissha Advanced Technologies Europe GmbH's DDS procedure in response to the EUDR Regulation. Table 1 provides an overview of the DDS procedure documents, forms, and templates accompanied by a short introduction to their objectives and use.

Table 1: Overview of due diligence system Content

Name	Guidelines
Due Diligence System Procedure	Standard Operating Procedure (SOP) that sets out Nissha Advanced Technologies Europe GmbH's DDMS and the core processes for conducting due diligence in line with EUDR requirements.
EUDR Policy	Nissha Advanced Technologies Europe GmbH's Responsible Sourcing Policy, outlining the company's commitment to sourcing free from deforestation and in compliance with legal requirements.
Supplier Information Letter	Note: This does not replace the product/shipment-specific risk assessments required under EUDR Article 10.
Supplier Consent Form Template	Optional template to capture full supply chain and geolocation-to-origin details for relevant products.

1.5. EUDR DDS Quality Control and Monitoring

The following quality control procedures have been established to ensure monitoring compliance with Nissha Advanced Technologies Europe GmbH's EUDR Due Diligence Management System procedures

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

1.5.1. Annual Internal Review, Audit and Reporting

Nissha Advanced Technologies Europe GmbH reviews the EUDR Due Diligence System through an independent audit function, at least once a year. This ensures that any new developments that could impact on the system are promptly identified and integrated. In response to such developments, Nissha Advanced Technologies Europe GmbH updates the due diligence management system to reflect these changes accurately. The annual monitoring process can be performed by Nissha Advanced Technologies Europe GmbH, or by a third-party auditing body.

DDMS maintenance is overseen by the overall responsible position and is maintained, reviewed, and revised annually to ensure that the DDMS functions effectively, responsibilities are clear, and procedures are implemented, and to ensure that risk assessments are reviewed, at least, annually and whenever changes are made to supply chains.

We conduct a comprehensive assessment of our Due Diligence Management System (DDMS) every 12 months to ensure operational effectiveness. This assessment involves the following input:

- Reviewing and updating all DDMS procedures and policies to ensure they reflect current best practices and regulatory requirements.
- Clarifying roles and responsibilities within the DDMS to ensure all team members understand their duties.
- Conduct training sessions for staff to ensure they are fully informed about any updates or changes to the DDMS.
- Results of past internal reviews/audits and independent third-party audits and progress in implementing recommendations from these.
- Any substantiated concerns raised by stakeholders and competent authority checks.
- Stakeholder feedback includes internal and external feedback mechanisms, enabling stakeholders to provide comments and receive a response through a process where anonymity can be protected on request.
- Process performance, looking at performance against operational targets (for example, to complete DD by a certain stage in the sourcing process and use of external software provides for DDS declaration

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

- Evaluation of the adequacy of available staff resources and budget.

We carry out, at least, an annual review of our supply chain risk assessments to maintain oversight. This includes:

- Re-evaluating all suppliers and supply chain partners to identify any new or emerging risks.
- Triggering additional reviews immediately upon detecting significant changes, such as new suppliers, geopolitical shifts, or major changes in market conditions.
- All additional mitigation actions and gap closure identified to ensure EUDR compliance, as reflected in the chapter 5. Risk Mitigation.

Reports of monitoring, including potential non-conformances (NC) identified during the annual review / audits are documented and stored within Nissha Advanced Technologies Europe GmbH's operational quality system registrations. Non-conformance reports registered within the operational NC and CPM procedures are accompanied by a clear corrective action request with a defined timeline. All corrective / preventive action requests are addressed within the defined timeline and appropriate action is taken to close the non-conformance.

Supply chain, supplier evaluation and risk assessment results are revised within Nissha Advanced Technologies Europe GmbH's operational quality system registrations whenever changes are made to supply chains, sources, new suppliers, products, or species and are included in the scope of the due diligence management system.

Furthermore, Nissha Advanced Technologies Europe GmbH maintains a meticulous record of all updates made to the due diligence systems for a period of five years.

1.5.2. Public Reporting

Nissha Advanced Technologies Europe GmbH publishes a public report on their DDMS, on an annual basis to ensure transparency and accountability, including details about the implemented due diligence management system including:

- Summary information on the collection of information, data, and documents needed to fulfill the requirements set out in Chapter 3. Information Gathering;
- Risk assessment conclusions and measures undertaken as referred to in Chapter 4. Risk Assessment;

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

- Risk Mitigation measures undertaken as referred to in Chapter 5. Risk Mitigation;
- A description of the information and evidence obtained and used to assess the risks;
- Where applicable a description of the consultation process with indigenous peoples, local communities, other customary tenure rights holders, or civil society organizations present in the area of production of the relevant commodities and products.
- Nissha Advanced Technologies Europe GmbH EUDR policy
- Nissha Advanced Technologies Europe GmbH's training approach to ensure responsible staff have sufficient skills and expertise to deliver.
- Key Performance Indicators to measure the effectiveness of the DDMS and performance against important requirements.

Nissha Advanced Technologies Europe GmbH EUDR public report will be available on the Internet (<https://iml-specialist.com/compliance>), as a stand-alone report. This will be referred to as the "Nissha Advanced Technologies Europe GmbH EUDR Report", to guide our public reporting on the due diligence management system for responsible sourcing.

1.5.3. Complaints, New Information and Substantiated Concerns

Nissha Advanced Technologies Europe GmbH is committed to maintaining the highest standards of business conduct. It is important that any non-compliance, act of fraud or other misconduct within Nissha Advanced Technologies Europe GmbH or, as a result of Nissha Advanced Technologies Europe GmbH's business activity or the acts of any employee, temporary worker or contractor, is reported and properly addressed

Nissha Advanced Technologies Europe GmbH recognizes that employees have an important role to play in achieving this goal. As part of this commitment, Nissha Advanced Technologies Europe GmbH strongly encourages Employees who have Concerns to come forward and express them to enable Nissha Advanced Technologies Europe GmbH to investigate and address these matters.

Grievance Mechanism

Nissha Advanced Technologies Europe GmbH ensures comprehensive record-keeping and effective management of all disputes and remedial actions related to its activities. Detailed records of all disputes

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

documenting the actions taken and their effectiveness are maintained. Designated personnel in the Quality Department handle the dispute resolution process, including the investigation and decision-making steps, and ensure that the entire process is recorded. Nissha Advanced Technologies Europe GmbH provides a written response to the disputing party within a period of 6 weeks and may contact relevant third parties to clarify the situation or gather additional information. If the disputing party is not satisfied with the response, they may submit a written follow-up addressing their concerns.

New Information and Substantiated Concerns

If Nissha Advanced Technologies Europe GmbH obtains or is made aware of relevant new information, including substantiated concerns, indicating that a relevant product placed on the EU market is at risk of non-compliance with the Regulation, the company shall inform (art 4.5 & 5.5) the competent authorities of the EU country where the relevant product was placed on the EU market. Additionally, Nissha Advanced Technologies Europe GmbH informs the suppliers to whom they supplied the relevant product.

In the case of exports, Nissha Advanced Technologies Europe GmbH informs the competent authority of the EU country of production or the EU country where the relevant product was placed on the EU market.

Making information available to Competent Authorities

Nissha Advanced Technologies Europe GmbH makes available to the competent authorities upon request any information related to the EUDR system.

1.6. Material Control & Segregation

Nissha Advanced Technologies Europe GmbH maintains physical segregation of all relevant products approved for the EU market, or for export from the EU market, from those of unknown, potentially illegal or deforested origin, throughout the entire process of reception, processing, packing, and shipping. The responsible personnel ensure that the relevant products that have not yet been approved for placing on the market or exporting are kept physically separate from approved relevant products. See Nissha Japan, additionally, Nissha Advanced Technologies Europe GmbH addresses any risk of mixing as part of its Risk Assessment and Risk Mitigation (Chapters 4 and 5).

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

1.7. Maintaining Records and Evidence

To monitor the procurement system effectively, Nissha Advanced Technologies Europe GmbH maintains records and evidence covering all Due Diligence Management System steps. Records and evidence are available digitally or on paper. This includes, for example: risk identification templates, certification scheme evaluation checklists, supply chain mapping, previously submitted due diligence statement numbers, purchase orders, invoices, delivery notes, certificates of origin, business registration certificates, and tax receipts. It also includes reports and information that support our risk analyses, as well as evidence to demonstrate the effectiveness of our risk mitigation measures.

The minimum maintenance time for all records and evidence is 5 years.

When necessary, Nissha Advanced Technologies Europe GmbH will make any record and evidence related to its Due Diligence Management System, available to the Competent Authorities upon request, to ensure compliance with the EUDR.

Nissha Advanced Technologies Europe GmbH maintains evidence in Waltershausen.

2. Scoping

This chapter outlines the scope and scoping exercise fundamental to Nissha Advanced Technologies Europe GmbH's EUDR DDMS for products placed on the EU market, made available on the EU market, or exported from the EU market. The EUDR DDM System includes all relevant products for which Nissha Advanced Technologies Europe GmbH has a legal obligation to ensure compliance with the EUDR.

A continuous scoping exercise ensures that Nissha Advanced Technologies Europe GmbH accurately determines the applicability of the EUDR to its products and maintains compliance through a systematic approach.

Once a product is identified as a relevant product falling within the scope of the EUDR, it is systematically registered and managed within Nissha Advanced Technologies Europe GmbH DDS.

Arbeitsanweisung A3-AA-06 EUDR-Management-System

2.1. Relevant Commodities and Relevant Products

The **Due Diligence Management System (DDMS)** applies to all relevant products placed on the EU market or exported from the EU, where Nissha Advanced Technologies Europe GmbH has a legal obligation to conduct due diligence. The full and updated list of these products, categorized by Harmonized System (HS) codes, is maintained in the Commodity Profile of Nissha Advanced Technologies Europe GmbH.

The following table outlines the range of relevant wood pulp products sourced by Nissha Advanced Technologies Europe GmbH and the identified scenarios that define Nissha Advanced Technologies Europe GmbH's roles in relation to the EU market and compliance with the **EUDR**.

Table 2: Nissha Advanced Technologies Europe GmbH DDMS Scope

HS Code	Nissha Advanced Technologies Europe GmbH Products	Scenario	Nissha Advanced Technologies Europe GmbH Role	Nissha Advanced Technologies Europe GmbH Processes	Origin
4703	Imported coniferous chemical wood pulp	1	First operator	Imports a product in the EU	JAP
4823	Paper strips, non-rectangular shapes	2	Downstream operator	Process a product from EU market and trade it in the EU	EU
4823	Paper strips, non-rectangular shapes	3	Operator for export	Exporting a processed product from the EU	EU

See the **Commodity Profile of Nissha Advanced Technologies Europe GmbH**.

2.2. Nissha Advanced Technologies Europe GmbH Facilities

Nissha Advanced Technologies Europe GmbH facility is located at 99880 Waltershausen, Thüringen, Germany. This facility is responsible for placing relevant products on the EU

market, trade them within the EU market, and export them outside of the EU. This facility is in charge of the production and sales of plastic molded components and decorative films for mainly mobility interior/exterior, and production and sales of sustainable molded products.

2.3. Operator

Nissha Advanced Technologies Europe GmbH acts as an operator (first operator, downstream operator and operator for export), depending on its position within the supply chain.

The key responsibilities of any operator are:

- Ensuring that relevant products carry a minimal risk of contributing to deforestation or forest degradation;
- Developing and implementing procedures to exercise due diligence effectively;
- Preparing and submitting due diligence statements for the import or export of products or raw materials;
- Providing customers with the reference numbers of due diligence statements;
- providing a public annual report that details the due diligence processes, risk assessments, and compliance measures taken to ensure adherence to the EUDR
- Maintaining all relevant documentation for a period of five (5) years;
- Reporting any changes in deforestation or forest degradation risks to the appropriate authority; and
- Cooperating fully with any investigations conducted by the competent authority.

Table 3: EUDR Specific definitions for roles and responsibilities

EUDR Operator
<p>An operator is any natural or legal entity that, during commercial activity, places relevant products on the EU market or exports them from the EU market.</p> <p>As first operator is responsible for ensuring that the relevant products meet all due diligence requirements before being placed on the EU market or exported by:</p> <ul style="list-style-type: none">• implementing a due diligence ensuring negligible risk; and• issuing a DDS for every relevant product bought from outside the EU, before it enters the EU; and

- issuing a DDS for every relevant product before it is placed on the EU market or exported from the EU market.

2.3.1. Nissha Advanced Technologies Europe GmbH's EUDR roles and Responsibilities

Nissha Advanced Technologies Europe GmbH as Operator

Nissha Advanced Technologies Europe GmbH sources a relevant product from outside the EU market, acting as operator for this product, therefore, it must exercise due diligence in accordance with Article 8; not place relevant products on the market or export them without prior submission of a due diligence statement and communicate to operators and to traders further down the supply chain all information necessary to demonstrate that due diligence was exercised.

2.3.2. Description of Nissha Advanced Technologies Europe GmbH's scenarios roles and responsibilities:

The range of relevant wood pulp products sourced by Nissha Advanced Technologies Europe GmbH and the identified scenarios for understanding Nissha Advanced Technologies Europe GmbH's roles are described as follows:

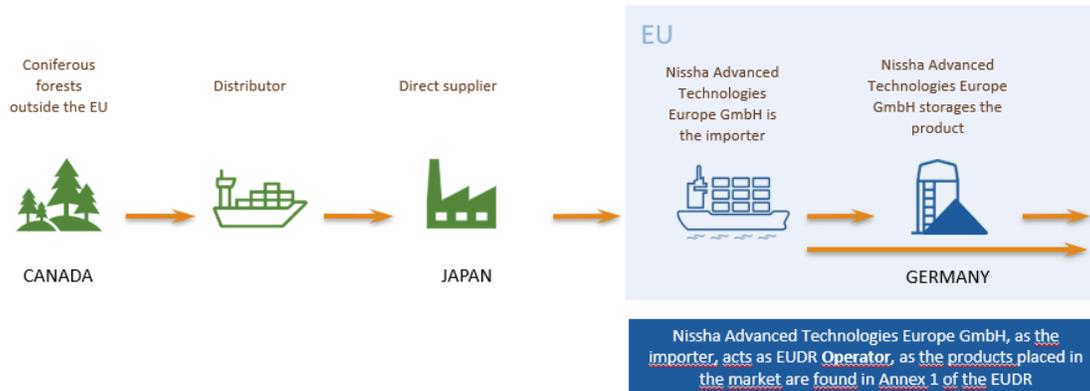
[Scenario 1: First operator](#)

Nissha Advanced Technologies Europe GmbH imports *coniferous chemical wood pulp* to the European market for the first time. As the initial importer, Nissha Advanced Technologies Europe GmbH assumes the role of operator under the EU Deforestation Regulation (EUDR).

As an Operator Nissha Advanced Technologies Europe GmbH must conduct thorough due diligence to verify the sustainability and traceability of the products, ensuring they are not linked to deforestation or land conversion in their country of origin. The accompanying graph illustrates the flow of these products into the EU market, emphasizing Nissha Advanced Technologies Europe GmbH's critical responsibility in facilitating their compliant introduction while adhering to EUDR regulation.

Arbeitsanweisung A3-AA-06 EUDR-Management-System

SCENARIO 1: Nissha Advanced Technologies Europe GmbH importing **coniferous wood pulp** to the EU → Operator



Scenario 2: Downstream operator

In this scenario, Nissha Advanced Technologies Europe GmbH transforms *coniferous wood pulp* into paper strips. As Nissha Advanced Technologies Europe GmbH sources a relevant product from the EU market and transforms it into relevant product, to later trade it within the EU, it becomes a downstream operator.

Nissha Advanced Technologies Europe GmbH must ensure that the *Paper strips, non-rectangular shapes* complies with all relevant sustainability and traceability requirements. This includes conducting thorough due diligence to verify that the products are sourced responsibly and do not contribute to deforestation or land conversion in their countries of origin.

SCENARIO 2: Nissha Advanced Technologies Europe GmbH sourcing **wood pulp** and transforming it **into paper strips** → Downstream operator



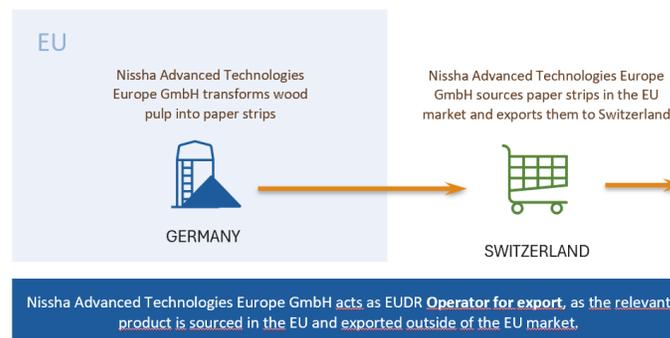
Arbeitsanweisung A3-AA-06 EUDR-Management-System

Scenario 3: Operator for export

In this scenario, Nissha Advanced Technologies Europe GmbH exports paper strips, sourced in the European Union. According to the EU Deforestation Regulation (EUDR), Nissha Advanced Technologies Europe GmbH assumes the role of an operator for export, responsible for exporting the *paper strips* in Switzerland, outside of the EU market.

Nissha Advanced Technologies Europe GmbH must ensure that the *paper strips* comply with all relevant sustainability and traceability requirements. This includes conducting thorough due diligence to verify that the products are sourced responsibly and do not contribute to deforestation or land conversion in their countries of origin.

SCENARIO 3: Nissha Advanced Technologies Europe GmbH sourcing **paper strips** in the EU and exports them outside of the EU → Operator for export



2.3.3. Continuous scoping exercise

Before Nissha Advanced Technologies Europe GmbH buys a potentially relevant product, it conducts a scoping exercise. This involves following a series of steps to determine the applicability of the EUDR procedures. The outcome of this scoping exercise guides Nissha Advanced Technologies Europe GmbH to the relevant chapters of these EUDR procedures for both incoming and outgoing relevant products. The regular steps for incoming and outgoing product situation are described as follows:

Arbeitsanweisung A3-AA-06 EUDR-Management-System

Incoming Product

Step 1	Determine if the incoming product falls within the scope of the EUDR. If the product is not covered, no further action is required.
Step 2	Establish whether Nissha Advanced Technologies Europe GmbH is acting as the first operator for this product.
Step 3	If identified as the first operator, follow Chapter 3, and 5 before the relevant product is introduced into the EU market. If not identified as the first operator, go to Outgoing product process flow.
Step 4	Identify if the relevant product is bought and sold as certified or non-certified product, to follow the certified route, when required

Outgoing Product

Step 1	Determine if the outgoing product falls within the scope of the EUDR. If the product is not covered, no further action is required.
Step 2	Establish whether Nissha Advanced Technologies Europe GmbH is acting as a downstream operator or trader for the relevant product.
Step 3	Follow Chapters Fehler! Verweisquelle konnte nicht gefunden werden. and Fehler! Verweisquelle konnte nicht gefunden werden. before the product is sold on the EU market or exported from the EU market.
Step 4	Identify if the relevant product is bought and sold as certified or non-certified product, to follow the certified route, when required.

The process flow is followed each time Nissha Advanced Technologies Europe GmbH engages in the buying of a potentially relevant product to maintain EUDR compliance.

3. Information gathering

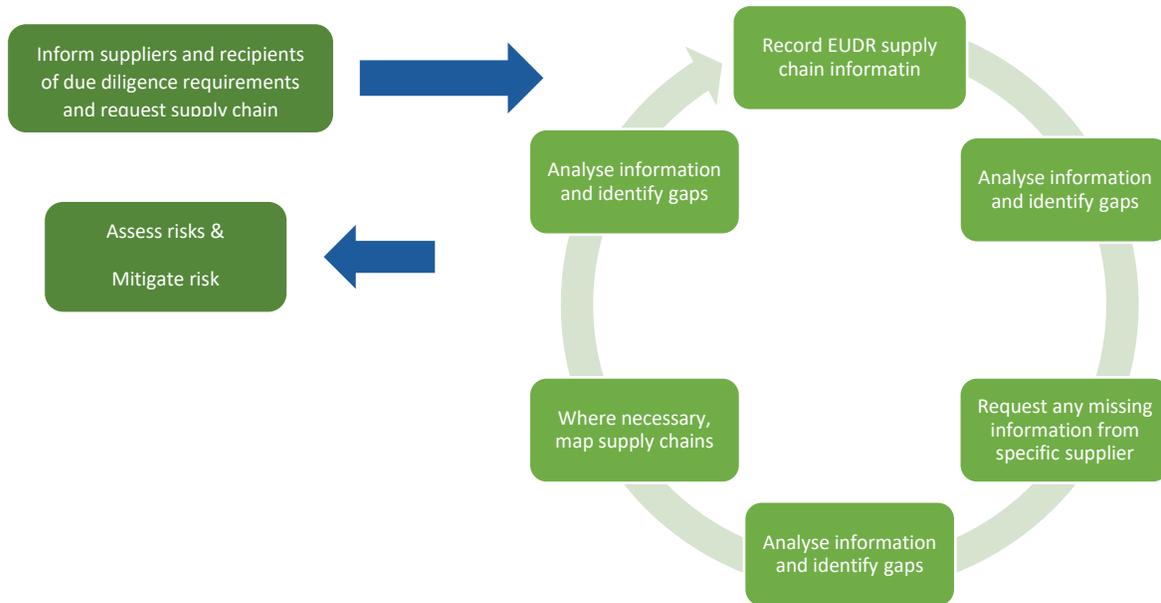
Article 9 of the EUDR sets out the requirements for Operators to gather information from upstream suppliers and recipients to ensure that products placed on the market are deforestation-free. In addition, Article 11 of the EUDR sets out the requirements for Operators to establish and keep up to date a framework of procedures and measures to ensure that the relevant products they place on the market or export, comply with EUDR. Thus, as part of compliance with Article 11, the information gathering procedure needs to cover Nissha Advanced Technologies Europe's obligations under Article 9.

Prior to Nissha Advanced Technologies Europe placing relevant products on the EU market or exporting thereof, Nissha Advanced Technologies Europe collects and documents supply chain information.

Nissha Advanced Technologies Europe keeps any documented information for a minimum of 5 years from the date of being placed on the market or of the export of the relevant products, accompanied by evidence relating to each relevant product.

Information is available to a level of detail where negligible risk can be concluded, or to a level where risk mitigation actions can be established. **Fehler! Verweisquelle konnte nicht gefunden werden.** demonstrates the information collection process flow.

Figure 2: The information gathering process.



3.1. Collecting Supply Chain Information

To provide sufficient access to relevant information, Nissha Advanced Technologies Europe gathers the data detailed in Table 6 for each relevant product. To facilitate the collection of supply chain information Nissha Advanced Technologies Europe sends a copy of the **Supplier Information Letter and Consent letter** to each supplier and obtains a signed written consent form back from each supplier. Nissha Advanced Technologies Europe also sends the **Supplier Questionnaire (Forms)** to suppliers and requests them to complete and return it completed as a self-assessment on EUDR compliance.

Table 6: Information collected per relevant product.

Information Collection	
1. Product Description	<ul style="list-style-type: none"> • HS code (to be used in the DD statement) • Trade name and type of the product • A list of relevant commodities or products contained therein or used to make the product (if applicable)

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

Information Collection	
2. Product Quantity	<ul style="list-style-type: none"> Quantity expressed in kilograms of net mass for products entering or leaving the market Where applicable, a supplementary unit as set out in Annex I to Council Regulation (EEC) No 2658/87, aligned with the Harmonized System code For other cases, quantity expressed in net mass, volume, or number of items
3. Country of Production	<ul style="list-style-type: none"> The country of production and, where relevant, specific regions within the country
4. Geolocation and Production Date	<ul style="list-style-type: none"> Geolocation of all plots of land where the relevant commodities were produced For relevant products containing relevant commodities: Geolocation of all plots of land where the relevant commodities were produced Date or time range of production Any deforestation on these plots disqualifies the commodities/products from being placed on the market or exported
5. Supplier Information	<ul style="list-style-type: none"> Name, postal address, and email address of any supplier (business or person) from whom the relevant products have been supplied Name, postal address, and email address of any business, operator, or trader to whom the relevant products have been supplied.
6. Deforestation-Free Verification	<ul style="list-style-type: none"> Adequately conclusive and verifiable information that the relevant products are deforestation-free
7. Legal Compliance Verification	<ul style="list-style-type: none"> Adequately conclusive and verifiable information that the relevant commodities have been produced in accordance with the relevant legislation of the country of production, including any arrangements conferring the right to use the area for production
8. Certification	<ul style="list-style-type: none"> (If applicable) any (third party) certification information for the relevant product including type of certification, percentage of relevant material sourced that is certified, certification ID or code.

Information Collection	
9. Supplier Due Diligence Statement Number	<ul style="list-style-type: none">• Due Diligence Statement unique number provided by suppliers that act as operator or trader to track all transactions and information prior to placing the relevant product in the EU market or exporting (if applicable).

See **Supplier Information Letter & Consent Letter (Template)**

See **Supplier Information (Form)**

3.2. Recording Supplier Information

Nissha Advanced Technologies Europe Group collects and records information on all supply chains / suppliers included within the scope of the EUDR within the **EUDR Management Form** to provide an overview of Nissha Advanced Technologies Europe's suppliers and supply chain.

See **EUDR Management Form**

3.3. Evaluating Documents and Information

Documents and information are evaluated to identify if information is lacking about a relevant product's supply chain, or if information is inadequate to enable conducting an effective risk assessment of the supply chain for that relevant.

3.3.1. Collecting Additional Information

If gaps in supply chain information are identified or there are concerns about the relevance, accuracy, or applicability of information provided, Nissha Advanced Technologies Europe collects additional information to close gaps or address concerns and enable conducting a complete risk assessment. When collecting additional information Nissha Advanced Technologies Europe group uses the Commodity Profile of Nissha Advanced Technologies Europe to keep up-to-date record details about its supply chain. This may be used where information is needed about upstream suppliers or the structure/ complexity of the supply chain.

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

Once additional information has been collected, Nissha Advanced Technologies Europe group updates the information in the EUDR Management Form to attain a complete supply chain overview.

See **Commodity Profile of Nissha Advanced Technologies Europe**

See **EUDR Management Form**

3.3.2. Revision of Supply Chain Information

Information on suppliers and supply chains is updated annually or whenever changes are made to the supply chains Nissha Advanced Technologies Europe group sources from. Nissha Advanced Technologies Europe group makes clear to each supplier that any changes to supply chains are communicated *prior* to the sale of any products to Nissha Advanced Technologies Europe group. This allows Nissha Advanced Technologies Europe group to re-evaluate supply chains prior to the purchase of goods. Suppliers confirm their commitment to informing Nissha Advanced Technologies Europe group of any changes to supply chains immediately and prior to the sale of products to us by signing and returning the Supplier Information Letter & Consent Letter return.

See **Supplier Information Letter (Template)**

Supplier self-assessment (Questionnaire – Traceability Part / Product List)

Additionally, all information regarding origin, suppliers, and relevant products must remain current and be updated before any relevant products are placed on the EU market.

When necessary, Nissha Advanced Technologies Europe Group may conduct a review of supplier supply chain information with the support of independent third-party experts to ensure accuracy and compliance.

3.3.3. Risk of Non-Compliance

If Nissha Advanced Technologies Europe group becomes aware of any information indicating a risk of non-compliance or circumvention of the Regulation, Nissha Advanced Technologies Europe group:

- Performs risk assessment and risk mitigation; and
- informs the competent authority of any relevant information of non-compliance.

Annex 1: Terms and Definitions

competent authorities: the authorities designated under Article 14(1) of the EUDR

country of origin: a country or territory as referred to in Article 60 of Regulation (EU) No 952/2013

country of production: the country or territory where the relevant commodity or the relevant commodity used in the production of, or contained in, a relevant product was produced

Country of production concerns: refers to any potential issues or red flags that need to be considered and possibly investigated further during the due diligence process.

Country of production risk: refers to the quantified or assessed level of risk associated with sourcing commodities from a specific country. is a more structured assessment used for decision-making and compliance under the EUDR

deforestation: the conversion of forest to agricultural use, whether human-induced or not

deforestation-free: (a) that the relevant products contain, have been fed with or have been made using, relevant commodities that were produced on land that has not been subject to deforestation after 31 December 2020; and (b) in the case of relevant products that contain or have been made using wood, the wood has been harvested from the forest without inducing forest degradation after 31 December 2020

downstream operator: is any natural or legal entity who, in the course of a commercial activity, transforms one relevant product (which has already been the object of due diligence) into another relevant product (the relevant products list can be found in Annex I of the EUDR or in the Supplier Management Form and places the relevant product(s) on the EU market or exports them.

due diligence: a process that involves assessing and managing the risk of sourcing products linked to deforestation or illegality. It requires gathering information about the supply chain, implementing risk mitigation measures, and maintaining documentation to ensure compliance with the EUDR.

due diligence Management system (DDMS): a structured approach to assess, monitor, and ensure that relevant products sourced or sold comply with the EUDR. It involves evaluating supply chain risks, gathering and verifying supply chain information, implementing risk mitigation strategies, and maintaining thorough documentation to prevent and address issues related to deforestation and illegal land use.

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

deforestation due diligence registry (also registry or EU information system): is a specialized online tool that streamlines the creation of DDSs within supply chains. The Registry allows operators, traders and their representatives to make electronic DDSs, and submit them to the relevant authorities to show that their products do not cause deforestation, in compliance with the EUDR.

Export: the procedure laid down in Article 269 of Regulation (EU) No 952/2013

first operator: any natural or legal entity who, in the course of a commercial activity, first places relevant products on the EU market or exports them. A first operator is responsible for ensuring that the relevant products meet all due diligence requirements before reaching the EU market or being exported from the EU market by implementing a due diligence system.

Forest: land spanning more than 0,5 hectares with trees higher than 5 meters and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use

forest degradation: structural changes to forest cover, taking the form of the conversion of:

- (a) primary forests or naturally regenerating forests into plantation forests or into other wooded land; or
- (b) primary forests into planted forests

Geolocation: means the geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits; for plots of land of more than four hectares used for the production of the relevant commodities other than cattle, this shall be provided using polygons with sufficient latitude and longitude points to describe the perimeter of each plot of land.

in the course of a commercial activity: for the purpose of processing, for distribution to commercial or non-commercial consumers, or for use in the business of the operator or trader itself

making available on the market: any supply of a relevant product for distribution, consumption or use on the EU market in the course of a commercial activity, whether in return for payment or free of charge

naturally regenerating forest: forest predominantly composed of trees established through natural regeneration; it includes any of the following:

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

- a) forests for which it is not possible to distinguish whether planted or naturally regenerated;
- b) forests with a mix of naturally regenerated native tree species and planted or seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity;
- c) coppice from trees originally established through natural regeneration;
- d) naturally regenerated trees of introduced species

negligible risk: the relevant product intended to be placed on the EU market or exported from the EU market can be concluded to have negligible risk of:

- not being deforestation-free; and
- not produced in accordance with the relevant legislation of the country of production.

non-compliant products: relevant products that do not comply with Article 3 of the EUDR

operator: any natural or legal person who, in the course of commercial activity, places relevant products on the market or exports them

person: a natural person, a legal person or any association of persons which is not a legal person, but which is recognized under EU or national law as having the capacity to perform legal acts

person established in the EU: (a) in the case of a natural person, any person whose place of residence is in the EU; (b) in the case of a legal person or an association of persons, any person whose registered office, central headquarters or a permanent business establishment is in the EU.

placing on the market: the first making available of a relevant commodity or relevant product on the EU market

planted forest: forest predominantly composed of trees established through planting and/or deliberate seeding, provided that the planted or seeded trees are expected to constitute more than 50 % of the growing stock at maturity; it includes coppice from trees that were originally planted or seeded

plantation forest: a planted forest that is intensively managed and meets, at planting and stand maturity, all the following criteria: one or two species, even age class, and regular spacing; it includes short rotation plantations for wood, fiber and energy, and excludes forests planted for protection or ecosystem restoration,

Arbeitsanweisung

A3-AA-06

EUDR-Management-System

as well as forests established through planting or seeding, which at stand maturity resemble or will resemble naturally regenerating forests

plot of land: land within a single real-estate property, as recognized by the law of the country of production, which enjoys sufficiently homogeneous conditions to allow an evaluation of the aggregate level of risk of deforestation and forest degradation associated with relevant commodities produced on that land

primary forest: naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed

produced: grown, harvested, obtained from or raised on relevant plots of land or, as regards cattle, on establishments

relevant commodities: cattle, cocoa, coffee, oil palm, rubber, soya and wood

relevant legislation of the country of production: the laws applicable in the country of production concerning the legal status of the area of production in terms of:

- a) land use rights;
- b) environmental protection;
- c) forest-related rules, including forest management and biodiversity conservation, were directly related to wood harvesting;
- d) third parties' rights;
- e) labor rights;
- f) human rights protected under international law;
- g) the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples;
- h) tax, anti-corruption, trade and customs regulations

relevant products: products listed in Annex I that contain, have been fed with or have been made using relevant commodities

relevant products entering the market: relevant products from third countries placed under the customs procedure 'release for free circulation' that are intended to be placed on the EU market and are not intended for private use or consumption within the customs territory of the EU

Arbeitsanweisung A3-AA-06 EUDR-Management-System

relevant products leaving the market: relevant products placed under the customs procedure 'export'

Small and Medium-sized Enterprises (SME) According to Directive 2013/34/EU, an SME is defined as:

- Medium-sized <250 employees, < € 20mn turnover, < €40mn balance sheet total
- Small <50 employees, <€ 8mn turnover, <€4mn balance sheet total
- Micro <10 employees, < €700k turnover, <€250k balance sheet total

specified risk: the relevant product intended to be placed on the EU market or exported from the EU market can be concluded to have risk of:

- not being deforestation-free; and
- not produced in accordance with the relevant legislation of the country of production.

substantiated concern: a duly reasoned claim based on objective and verifiable information regarding non-compliance with this Regulation and which could require the intervention of competent authorities

trader: any person in the supply chain other than the operator who, in the course of a commercial activity, without transforming relevant products into other relevant products, makes relevant products available on the market

Annex 2: Abbreviations

DD	Due Diligence
DDS	Due Diligence Statement
DDMS	Due Diligence Management System
EU	European Union
HS	Harmonized System
SME	Small and Medium-sized Enterprise
SC	Supply Chain