

To: Ball & Doggett Limited  
Brad Partington

## PRODUCT SAFETY STATEMENT

<b>Product Name(s)</b>	MetsäBoard Prime FBB Bright NEW
<b>Production Site(s)</b>	Metsä Board Kyro Finland (Paperboard)
<b>Product Description</b>	Fully coated bleached paperboard with coated back

The content of this statement is valid for the Metsä Board trade name(s) mentioned above.

Metsä Board is a leading European producer of folding boxboards and white linerboards. All our paperboards are made from fresh fibres, which can be traced back to their source in sustainably managed northern forests. Products are manufactured in Metsä Board production sites in compliance with good manufacturing practice and quality management system certified according to ISO 9001, ISO 14001 and ISO/FSSC 22000.

## FOOD CONTACT

### Declaration of Compliance

We hereby state that this product is in compliance with the following global food contact laws and regulations. The product has been tested by an independent laboratory for suitability for food contact and compliance with the regulations and recommendations, taking also into consideration the declarations of compliance provided by our raw materials and additives suppliers and additional information obtained on a confidential basis.

The trade name(s) mentioned above are suitable for food contact as described below.

#### EU:

<b>Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food</b>	Complies when applicable and under foreseeable conditions of use
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<b>Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food</b>	Complies when applicable and under foreseeable conditions of use
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#### Germany:

<b>BfR (Bundesinstitut für Risikobewertung) XXXVI. Paper and board for food contact</b>	Dry and non-fatty foods
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#### USA:

<b>The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 21 C.F.R. §§ 176.170 (“Components of paper and paperboard in contact with aqueous and fatty foods”) and 176.180 (“Components of paper and paperboard in contact with dry food”)</b>	All food types under FDA’s Conditions of Use A (“High temperature heat-sterilized (e.g., over 212°F)”) through H (“Frozen or refrigerated: Ready-prepared foods intended to be reheated in container at time of use”), provided that it is separated from the food by a polymer coating. If no such polymer coating is applied to the paperboard, it may be used in contact with fatty
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foods (Food Types III, IV-A, V and VII-A) and dry  
foods (Food Types VIII and IX) only.

## NON-USE WARRANTY

We hereby warrant that Metsä Board does not use the substances listed below in its production processes. Based on testing and/or information received from raw material suppliers this product is free from substances listed below or, where these substances exist as traces in the raw materials or are generated during the manufacturing process, their content is below the limits specified in applicable legislation or agreement, and never exceeding the threshold limit of 0,1% by weight of the product.

<b>1. Recycled material</b>	This product is manufactured from virgin materials and does not contain any recycled materials.
<b>2. Chlorine</b>	Pulps used in production of the product come from ECF (elementary chlorine free) and TCF (total chlorine free) processes. Chemical pulp process is ECF and BCTMP process is TCF.
<b>3. Fluorine</b>	<p>According to third-party accredited laboratory testing, fluorine has not been detected in the product (detection limit 0.05 µg/dm<sup>2</sup>).</p> <p>Fluorinated chemicals, such as perfluorinated chemicals (PFCs) including perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid and its derivatives (PFOS), are not used in the manufacturing of the product.</p> <p>The following three specific perfluoroalkyl ethyl containing food-contact substances have not been used in the manufacturing of the product as listed in the rule 81 FR 5 by the Food and Drug Administration on 01/04/2016:</p> <ol style="list-style-type: none"><li>1. Diethanolamine salts of mono- and bis (1H, 1H, 2H, 2H perfluoroalkyl) phosphates where the alkyl group is even-numbered in the range C8-C18 and the salts have a fluorine content of 52.4 percent to 54.4 percent as determined on a solids basis</li><li>2. Pentanoic acid, 4,4-bis [(gamma-omega-perfluoro-C8-20-alkyl)thio] derivatives, compounds with diethanolamine (CAS Reg. No. 71608-61-2)</li><li>3. Perfluoroalkyl substituted phosphate ester acids, ammonium salts formed by the reaction of 2,2-bis[(gamma), [omega]-perfluoro C4-20 alkylthio) methyl]-1,3-propanediol, polyphosphoric acid and ammonium hydroxide</li></ol>
<b>4. Heavy metals</b>	<p>No heavy metals are intentionally added during the manufacturing process.</p> <ul style="list-style-type: none"><li>• Heavy metal traces are under the limits regulated in Finnish legislation 268/1992</li></ul> <p>Any traces of lead, mercury, cadmium and chromium (VI) present in the product do not exceed 100 ppm in total by weight as regulated in</p> <ul style="list-style-type: none"><li>• Directive 94/62/EC on Packaging and Packaging Waste and its amendments</li><li>• CONEG: The Model Toxics in Packaging Legislation</li></ul>
<b>5. ResAP (2002) 1</b>	This product complies with the restriction limits set forth in Tables 1 and 2 of Council of Europe Resolution ResAP (2002) 1 on paper and board materials and articles intended to come into contact with foodstuffs.

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<b>6. Genetically modified organisms (GMO)</b>	No GMO raw materials are used in the production process. GMO as defined by EU Directive 2001/18/EC means an organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination.
<b>7. Animal origin, Halal, Kosher</b>	Raw materials of animal origin, ethanol or grape/fruit/grain based alcohol are not used in the manufacturing of the product. However, this product is not certified according to Halal or Kosher requirements.
<b>8. Conflict minerals</b>	<p>Chemicals containing gold (Au), tantalum (Ta), tin (Sn) and wolfram (W) also known as tungsten, are not used in the manufacture of the product.</p> <p>We also hereby declare that raw materials originating from the Democratic Republic of Congo are not used as raw materials and the product fulfils the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.</p>
<b>9. POP Regulation and brominated flame retardants</b>	Substances listed in the Regulation (EC) No 850/2004 on persistent organic pollutants "POPs", including polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs) as listed in EU Regulation 757/2010 amending Regulation (EC) No 850/2004 of the European Parliament and of the Council on persistent organic pollutants (POPs) as regards Annexes I and III.
<b>10. RoHS 2</b>	Directive 2011/65/EU (RoHS 2 Annex II) on the restrictions of the use of certain brominated flame retardants, heavy metals and phthalates in electrical and electronic equipment.
<b>11. California Proposition 65</b>	Substances listed in California Proposition 65 The Safe Drinking Water and Toxic Enforcement Act of 1986 are not used as raw materials. In case listed substances are present as traces, the exposure is estimated to be below relevant safe harbor levels. If no safe harbor level is given, an internal risk assessment has been performed to show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.
<b>12. Endocrine disrupting chemicals (EDC)</b>	Substances listed in European Commission Final Report "Towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption" Annex 15 or ECHA's endocrine disruptor (ED) assessment list (updated 25.10.2018)
<b>13. Ozone depleting substances</b>	Substances listed in Regulation (EC) No. 1005/2009 on substances that deplete the ozone layer. Substances listed in Montreal Protocol 1987.
<b>14. UNEP 12 Chemicals, Persistent organic pollutants</b>	Aldrin, Chlordane, Dieldrin, DDT, Endrin, Heptachlor, Hexachlorobenzene, Mirex, Toxaphene, Polychlorinated biphenyls (PCBs), Dioxins and Furans as listed in United Nations Environment Programme 1997.
<b>15. Epoxy derivatives</b>	2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether ('BADGE' i.e. Bisphenol-A DiGlycidyl Ether), bis(hydroxyphenyl) methane bis(2,3-epoxypropyl) ethers ('BFDGE' i.e. Bisphenol-F DiGlycidyl Ether) and novolac glycidyl ethers (NOGE) as listed in Regulation (EC) No. 1895/2005.
<b>16. Other substances of concern</b>	Anthraquinone Asbestos Azocolourants and azodyes as defined in Annex XVII of REACH Benzophenone and hydroxybenzophenone Bisphenol A and Bisphenol-A DiGlycidyl Ether (BADGE)

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Bisphenol F and Bisphenol-F DiGlycidyl Ether (BFDGE)  
Bisphenol S  
Butylated hydroxyanisole (BHA)  
Butylated hydroxytoluene (BHT)  
Colophony  
Creosote  
Fragrances  
Isopropylthioxanthone (ITX)  
Melamine  
Natural rubber latex materials  
Nonylphenols and nonylphenol ethoxylates, TNPP  
Novolac glycidyl ethers (NOGE)  
Polyvinylchloride (PVC)  
Titanium dioxide  
Triclosan

## INDUSTRY GUIDELINES AND POLICIES

Metsä Board complies with the Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles, March 2019, formally called "Industry Guideline" whose first publication dates back to 2010, under the aegis of CEPI and CITPA, and first revision to 2012. The guideline is supported by the European paper and board supply chain: CEPI (paper and board manufacturers); CITPA (paper and board converters); ECMA (carton makers association), ACE (beverage cartons alliance), CCB (CEPI containerboard), FEFCO (corrugated packaging) and ETS (tissue paper association).

## REACH

We hereby warrant that the requirements of REACH Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals are fulfilled and only chemicals complying with the provisions laid down in the regulation are used.

This product complies with the relevant restrictions set forth in Annex XVII of REACH Regulation on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. Furthermore, substances subject to authorisation listed in Annex XIV are not used.

According to REACH Regulation chemical suppliers are required to inform downstream users regarding the presence of substances listed on the Candidate List of Substances of Very High Concern (SVHC) for Authorisation above the reporting limit. Based on this information this product does not contain Substances of Very High Concern above the reporting limit of 0,1%. Additionally, no SVHC's have been detected in control tests conducted in a third party laboratory.

## ALLERGENS

We hereby warrant that substances or products causing allergies or intolerances listed in Regulation (EU) No 1169/2011 Annex II and in the Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA, U.S.A.) are not used as raw materials in the manufacturing process of this product. This includes for example cereals, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, lupin and molluscs.

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This product can be considered as gluten-free according to the definition of Commission Regulation (EC) No 41/2009 concerning the composition and labelling of foodstuffs suitable for people intolerant to gluten and Food Labeling; Gluten-Free Labeling of Foods - A Rule by the Food and Drug Administration on 08/05/2013 USA FDA.

## MINERAL OIL (MOSH/MOAH)

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This product is manufactured from fresh fibres and does not contain any printed recycled material. Mineral oils are not used as raw materials in the manufacturing of this product. All used production chemicals and additives are approved for food contact.

## BIOCIDAL PRODUCTS

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According to Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products, this product is not defined as a treated article.

Biocides are used in the manufacturing process of this product to prevent harmful microbiological growth and to ensure the microbiological purity of the final product. No surface biocides are used and the transfer of antimicrobial constituents from the final product is tested in a third party laboratory to ensure no antimicrobial effect.

## NANOMATERIALS

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We hereby warrant that this product is not defined as a nanomaterial according to the Commission Recommendation on the definition of nanomaterial 2011/696/EU as amended. However, some of the additives that have commonly been used in pulp and paperboard production processes for centuries contain nanoscale particles. These particles are not classified as dangerous and do not pose a risk to human health.

## TOYS

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This product complies with Directive 2009/48/EC on the safety of toys Annex II, Part III, point 13 migration limits for scraped-off toy materials.

This product complies with the restrictions for Phthalates, Benzene and Azocolorants/Azodyes concerning toys set forth in REACH Regulation (EC) 1907/2006 Annex XVII on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. For additional information regarding REACH Regulation please refer to the REACH section of this document.

This product does not qualify as consumer or children's product according to Consumer Product Safety Improvement Act of 2008 (CPSIA). A subsequent amendment to the CPSIA, Pub. L. 112-28 § 2, 122 Stat. 273 (Aug. 12, 2011), specifically exempts ordinary books, paper-based printed materials, and materials similar to paper from the lead testing requirements. In addition, Consumer Product Safety Commission (CPSC) regulation 16 C.F.R. § 1500.91(d) specifically exempts paper-based materials from lead testing, so long as they have not been treated or adulterated in a manner that would cause them to come out of compliance. Manufacturers and importers also are excused in *Notice of Requirements to Assess Conformity with the Limits on Phthalates in Children's Toys and Child Care Articles*, 76 Fed. Reg. 49,286, 49,288 n.2 (Aug. 10, 2011); from testing and

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certifying that there are no phthalates in materials that are known not to contain phthalates, including paper products (paper, paperboard, linerboard and medium, and pulp).

Other heavy metal limits apply to the surface coatings and substrates of children's toys intended for children 13 and under, as set forth in Toy Safety Standard ASTM F963. As this product does not qualify as such, the limits for heavy metals do not apply. However, based on the compliance with Directive 2009/48/EC, the heavy metal content of this product is well below the limits set by CPSIA.

## HIGH TEMPERATURE MIGRATION

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As paperboard has no harmonized measures for food contact testing in the EU, Metsä Board paperboard products have been analysed for high temperature food contact conditions according to the Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food. Suitability for high temperature conditions has been tested according to overall migration test in food simulant, 30 minutes in 180 °C (356 °F) and 230 °C (428 °F) applying with test method EN 1186-13:2002 "Materials and articles in contact with foodstuffs. Plastics. Part 13: Test methods for overall migration at high temperatures".

Overall migration from samples is below the 10 mg/dm<sup>2</sup> limit determined in the Regulation (EU) No 10/2011 for plastic materials meaning the maximum permitted amount of non-volatile substances released from a material or article into food simulants is not exceeded at high temperature applications.

These migration results apply only for unprinted paperboard and functional barrier is recommended at high temperature applications. It is the end users responsibility to verify the suitability of the product for designed food application and end use.

## RISK MANAGEMENT

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Metsä Board products are manufactured from fresh fibres and therefore there is less risk of non-intentionally added substances (NIAS) such as traces of printing inks or mineral oils. Metsä Board evaluates all used raw materials and conducts internal risk assessment based on the supplier information.

All products are regularly tested by independent third party laboratories for food contact suitability and for globally recognized substances of very high concern, such as heavy metals. Routine and more specialised analyses are done in an internal research centre, where also new testing methods are developed. Toxicological tests have also been conducted by a third party laboratory and no genotoxicity of Metsä Board paperboards has been observed.

Metsä Board performs worst case migration calculations for all products and conducts testing as necessary. For example for PE coated paperboards migration testing is conducted according to Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food even though it is not mandatory for the final multi-material multi-layer materials and articles.

As paperboard has no harmonised measures for food contact testing in the EU, Metsä Board has additionally tested its paperboards for suitability for high temperature applications according to the Regulation (EU) No 10/2011. Based on the worst case calculations and test results, the migration of substances into food in applicable conditions is below the legal or recommended limit values for all Metsä Board paperboard products. Therefore the cumulative daily intake can also be estimated to be on an acceptable level.

Metsä Board systematically follows relevant global product safety concerns and reacts accordingly. Our personnel attends trainings regularly in order to maintain up-to-date knowledge on possible safety risks. Metsä Board follows the standardised risk management and food safety (ISO/FSSC 22000) principles.

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## MATERIAL CIRCULATION

### **PACKAGING AND PACKAGING WASTE (EU)**

We hereby warrant that this product is in compliance with the requirements of Directive 94/62/EC and its amendment 2004/12/EC.

### **PACKAGING AND PACKAGING WASTE (USA)**

We hereby warrant that this product is in compliance with the requirements of CONEG (The Model Toxics in Packaging Legislation).

### **REQUIREMENTS FOR PACKAGING AND PACKAGING WASTE (EU & USA)**

<b>EN 13427 Requirements for the use of European standards in the field of packaging and packaging waste</b>	The procedures and record keeping enabling this declaration are part of Metsä Board's ISO 9001 and ISO 14001 management systems.
<b>ISO 18601 General requirements for the use of ISO standards in the field of packaging and the environment</b>	
<b>EN 13428 Requirements specific to manufacturing and composition. Prevention by source reduction</b>	During past few years Metsä Board has been able to reduce the weight of its products without compromising the important strength performance characteristics of the packaging. Reduction of the material weight is an important step towards the minimization of the packaging waste.
<b>ISO 18602 Optimization of the packaging system</b>	
<b>CR 13695-1 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment – Part 1: Requirements for measuring and verifying the four heavy metals present in packaging</b>	Concentrations of four named heavy metals are clearly below the regulated limits.
<b>CONEG Certification / The Model Toxics in Packaging Legislation (USA)</b>	
<b>CEN/TR 13695-2 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment. Part 2: Requirements for measuring and verifying dangerous substances present in packaging, and their release into the environment.</b>	Concentration of substances classified as hazardous is much less than 1 % of the product weight. Substances and mixtures classified as very* hazardous have not been used as raw materials in this product.  <i>*Very hazardous means the following classes of the Global Harmonized System (GHS): Carcinogenicity (Cat. 1A, 1B and 2), Acute toxicity (Cat 1 or 2), Mutagenicity (Cat 1A, 1B and 2), Reproductive toxicity (Cat 1A, 1B and 2), Hazardous to the aquatic environment (Acute 1 or Chronic 1) and Hazardous to ozone layer Cat. 1.</i>
<b>ISO 18602 Optimization of the packaging system</b>	
<b>EN 13429 Reuse</b>	Not applicable. Packaging made of this product is not foreseen to be refilled or used for the same purpose for which it was conceived.
<b>EN 13430 Requirements for packaging recoverable by material recycling</b>	This product has been manufactured using fresh fibres and chemicals which are compatible with known, relevant and industrially available paper recycling technologies in the EU.
<b>ISO 18604 Material recycling</b>	

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<b>EN 13431 Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value</b>	This product is suitable for energy recovery, as it is composed of much more than 50 % of organic content.
<b>ISO 18605 Energy recovery</b>	
<b>EN 13432 Requirements for packaging recoverable through composting and biodegradation. Test scheme and evaluation criteria for the final acceptance of packaging</b>	This product is industrially compostable according to EN 13432, ISO 18606 and ASTM D 6868.
<b>ISO 18606 Organic recycling</b>	
<b>ASTM D 6868-11 Standard Specification for Labeling of End Items that Incorporate Plastics and Polymers as Coatings or Additives with Paper and Other Substrates Designed to be Aerobically Composted in Municipal or Industrial Facilities</b>	

### **RECYCLABILITY (USA)**

This product is capable of being recycled, whether as part of an industrial recycling program or curbside recycling available to consumers. The U.S. Federal Trade Commission, however, restricts claims of recyclability if recycling of a given material is not available to a “substantial majority of consumers or communities,” which means at least 60% of consumers or communities have access to recycling. Currently, 73% and 50% of U.S. communities have access to recycling programs for unbleached and bleached paperboard, respectively, that rate can vary by a variety of factors. Thus, recycling facilities for bleached paperboard may not exist in your area.

This product is made of fresh fibres originating from Northern European forests. The pulp types used are high brightness BCTMP (Bleached chemi-thermomechanical pulp), chemical pulp (Kraft) and in some cases mechanical pulp. Metsä Board produces BCTMP at Kaskinen and Joutseno mills, Finland, by using modern own-patented technology. The bleached chemical pulp is made in Metsä Group mills in Sweden and Finland. The product specific compositions are listed in the Product composition table below. More information available in product specifications and paper profiles of each product.

Product composition table:

Product name	Brightness top %	BCTMP %	Chemical pulp %	Mechanical pulp %	Pigments and fillers %	Binders %	Moisture %
<b>MetsäBoard Natural FBB</b>	80,5	51	33		3	4	8
<b>MetsäBoard Natural FBB NEW</b>	80,5	51	33		3	4	8
<b>MetsäBoard Natural FSB Cup</b>	82	28	59		1	3	9
<b>MetsäBoard Natural WKL</b>	75		84		7	1	8
<b>MetsäBoard Natural WKL Bright</b>	86		81		8	3	8
<b>MetsäBoard Classic FBB</b>	84	16	25	36	10	5	8
<b>MetsäBoard Classic WKL</b>	77		82		10	1	7
<b>MetsäBoard Pro FBB</b>	87	46	27		13	5	9
<b>MetsäBoard Pro FBB Bright</b>	91	45	29		13	5	8
<b>MetsäBoard Pro FBB Bright NEW</b>	91	44	30		13	5	8
<b>MetsäBoard Pro FSB</b>	84	48	29		11	5	8
<b>MetsäBoard Pro FBB OBAfree NEW</b>	84	48	29		11	5	8
<b>MetsäBoard Pro FSB Cup</b>	85	18	59		9	5	9

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<b>MetsäBoard Pro FSB EB1</b>	85	43	30	12	6	9
<b>MetsäBoard Pro WKL</b>	82		78	13	2	7
<b>MetsäBoard Prime FBB</b>	89	40	29	18	6	9
<b>MetsäBoard Prime FBB Bright</b>	91	45	30	14	4	7
<b>MetsäBoard Prime FBB Bright NEW</b>	91,5	45	30	14	4	7
<b>MetsäBoard Prime FSB EB1</b>	85	43	30	12	6	9
<b>MetsäBoard Prime WKL</b>	82-85		75	17	2	6

Accordingly, Metsä Board recyclability claims are limited to the Metsä Board's products, and do not apply to any final package made from them. We recommend that our customers ensure they have adequate substantiation to support any claims of recyclability or other environmental performance with respect to their specific packaging configuration.

## DISCLAIMER

The information provided in this statement applies only for the paperboard, barrier coated paperboard or pulp material as delivered by Metsä Board Corporation and may not substitute necessary end use testing. Metsä Board Corporation shall not be liable for any damage or injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of the product for a particular application or end use.

The information given in this statement has been verified by Metsä Board Corporation at the date of its publication and we shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available.

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## METSÄ BOARD CORPORATION

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