



Trabocca Statement on the EU Deforestation Regulation

Trabocca supports the objectives of the EU Deforestation Regulation, Regulation (EU) 2023/1115, to minimise the contribution to deforestation and forest degradation.

The main obligations under the Regulation will apply from 30 December 2026. Trabocca has established an EUDR due diligence framework and is continuing to strengthen its relevant supply-chain processes, internal procedures and supporting systems in preparation for the application of the Regulation.

OUR APPROACH

Trabocca sources coffee through an international network of suppliers and long-standing sourcing relationships. Our Sustainability team leads the development and implementation of our EUDR due diligence approach, working closely with our sourcing, quality, logistics, commercial and IT teams.

Our EUDR due diligence activities form part of Trabocca's broader human rights and environmental [due diligence approach](#) and are supported by our policy framework, including our Due Diligence System, Ethical Sourcing Policy and Deforestation-free Sourcing Policy.

For commodities and products within the scope of the EUDR, our approach includes:

- collecting relevant product, supplier and supply-chain information;
- collecting production-area and geolocation information where required;
- reviewing traceability and legality information;
- assessing risks relating to deforestation and legality;
- implementing additional information requests or risk-mitigation measures where risks or information gaps are identified;
- documenting the assessment and its conclusions before relevant products are placed on the EU market or exported, where Trabocca acts as the operator under the Regulation.

We work directly with suppliers to explain the applicable requirements, improve data quality and strengthen the evidence available throughout our supply chains. Where additional information or risk mitigation is required, we engage with the relevant supplier and assess whether the identified risks can be reduced to a negligible level.

As part of the continued development of our due diligence framework, we are continuously seeking to strengthen the verification of supporting evidence, the documentation of supply-chain traceability, and the transparency of our risk-assessment and mitigation processes.

Stakeholders can report concerns relating to possible deforestation, legality, human rights or other policy violations through Acomo's, Trabocca's holding company, confidential [Speak Up mechanism](#). Relevant concerns are assessed as part of our due diligence processes.

INFORMATION FOR CUSTOMERS

The EUDR obligations and documentation applicable to a specific sale depend on several factors, including: the product and its customs classification; the relevant supply-chain flow; and the regulatory role of Trabocca and the customer in the transaction.

Where required under the Regulation, meaning where Trabocca imports coffee into the EU for clients, Trabocca will provide the applicable EUDR information (DDS reference number), relating to the relevant transaction on the order confirmation, delivery note and/or sales invoice.

The documentation made available to customers for a particular order will differ depending on the contract terms, i.e. whether Trabocca acts as trader outside the EU, the importer into the EU (operator placing the product on the EU market) or trader inside the EU (downstream operator).

Coffee that was placed on the EU market before 30 December 2026 may have the universal DDS reference number. In these cases, Trabocca will retain appropriate evidence demonstrating that the relevant stock was placed on the EU market before the EUDR obligations became applicable.

Customers with questions concerning a specific order or supply chain are invited to contact their regular Trabocca commercial representative. Product- and transaction-specific requests will be reviewed together with the Sustainability team.

For general questions concerning our EUDR approach, please contact:

sustainability@trabocca.com