ND Paper Rumford Mill (the Rumford Mill) operates all combustion boilers in compliance with state and federal air emission limits established in the Title V Air Operating Permit. These limits are set by the agencies to be protective of human health and the environment. All combustion units meet Best Available Control Technology (BACT) for SO2, NOx and particulate matter. SO2, NOx and % opacity (particulate matter surrogate) are measured continuously, reported quarterly, annually and permit allowable emissions are modeled in accordance with EPA protocol to ensure compliance with National Ambient Air Quality Standards. The combustion units normally emit less than 25% of permit allowable emissions. In addition to BACT requirements for SO2, NOx and particulate matter, mercury and HCl (Hydrochloric acid) must meet the most stringent emission limits for these compounds established by EPA's Maximum Available Control Technology (MACT). Mercury emissions are tracked daily and independently verified via third party's periodic testing at established intervals.

Rumford Mill's Cogeneration Circulating Fluidized Bed (CFB) boilers are top tier technology for combusting solids fuels including tire derived fuel (TDF), biomass and coal. The combustion technology and controls effectively minimize pollutant emissions given a diverse fuel mix. Coal is the smallest percentage of the facility fuel mix. A portion of fly ash from the Cogen boilers is beneficially reused resulting in less solid waste material. Startup of the cogeneration boilers enabled the shutdown of old, antiquated oil-fired boilers and beneficial use of tires for fuel. Combustion of TDF was endorsed by state and federal agencies and is applauded for reducing a significant solid waste disposal issue associated with used tires. Biomass and black liquor are significant fuel sources as well. CO2 emissions for all fuels are reported and combustion of biogenic fuels play a pivotal role in reducing CO2 emissions associated with fossil fuels. The facility has reduced fossil fuel and total CO2 emissions vs. baseline reference. All EPA and state reporting methods are followed for CO2 and other emissions, including under the Greenhouse Gas Reporting Program (GHGRP).

The Rumford Mill is proud of its environmental performance and has employed technology and practices to go beyond compliance for both air emissions and water discharges. Going as far back as the late eighties to early 1990's, the facility modified bleaching sequences, employed scrubbing technology and implemented odor controls before required by regulations. Like air emissions, water pollutant discharges are normally less than 20% of permit allowable limits. In 2023, $6MM was spent in the wastewater treatment plant to enhance treatment infrastructure and efficiency. In 2024 – 2025, $4.5MM was spent on the Cogeneration boilers precipitator modifications to reduce particulate matter emissions by 75%. In addition, a $7MM project is in engineering phase to convert the chemical recovery boiler's startup and supplemental fuel from oil to natural gas which will further reduce pollutant emissions.

This statement is provided for informational purposes only and does not constitute a legal representation, warranty, or assurance of regulatory compliance. While efforts are made to ensure accuracy and currentness, actual compliance status should be verified with official regulatory records and through consultation with appropriate environmental professionals or

legal counsel. The Rumford Mill reserves the right to update this statement as operations, regulations, or permit conditions change.

If you have questions or interest in discussing the details of the Rumford Mill environmental performance, please direct all further inquiries in writing to the company's General Counsel, Robert Lu at Email: Robert.Lu@us.ndpaper.com