

# LEGAL OPINION

## on the EUDR module of the lawcode Suite

### A. Introduction

With the EUDR module of the lawcode Suite, lawcode GmbH offers a software solution designed to assist users in fulfilling their obligations under the EU Deforestation Regulation<sup>1</sup> (hereinafter "**EUDR**").

### B. Executive summary

The EUDR module of the lawcode Suite offers a legally compliant way to automatically fulfill EUDR due diligence obligations (see Art. 9-11 EUDR) and to automatically submit due diligence statements for relevant products and raw materials to the EU information system via an interface solution.

| EUDR requirements                                                                        |   | Implementation option in the EUDR module                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Information collection, see Art. 9 EUDR                                                  | ✓ | Yes, with the help of the EUDR module, information can be collected and stored by the user on a "batch basis", as required by Art. 9 EUDR.                                                                                                                                                                                                                                                                    |
| Risk assessment, see Art. 10 EUDR                                                        | ✓ | Yes, with the help of the EUDR module, information collected by the user in accordance with Art. 9 EUDR can be assessed using the risk criteria listed in Art. 10 (2) EUDR to determine whether there is a risk that the assessed batch is not EUDR-compliant.                                                                                                                                                |
| Risk mitigation, see Art. 11 EUDR                                                        | ✓ | Yes, the EUDR module allows further risk mitigation measures to be planned and responsibilities assigned for these measures outside the platform. Additional information can also be obtained directly via the platform itself and by sending supplier questionnaires. The results of these measures can be integrated into the risk assessment of a batch in order to mitigate an initially identified risk. |
| Submission of due diligence statements in the EU information system, see Art. 4 (2) EUDR | ✓ | Yes, due diligence statements can be automatically submitted to the EU information system on a batch via the EUDR module, with lawcode GmbH acting as an authorized representative for users of the EUDR module in accordance with Art. 6 EUDR.                                                                                                                                                               |

**Note:** The ability to comply with the EUDR using the EUDR module depends largely on the appropriate use of the software and on the accuracy, timeliness, and completeness of the information and data provided by the user. The EUDR module cannot replace the user's responsibility; rather, it remains necessary to independently review the legal requirements, incorporate internal company data, and take additional measures to implement the EUDR. In view of the continuing lack of final regulatory requirements and ongoing developments, this legal assessment is only preliminary and takes into account the publications at the time of processing (September 2025).

<sup>1</sup> Regulation (EU) 2023/1115, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02023R1115-20241226>.