



## Timber Due Diligence Statement – June 2024

### **Sustainable & Well Managed Forestry:**

West Fraser Europe Limited is dedicated to producing board from sustainable sources of wood only. All the wood we use comes from responsibly managed forests and/or post-consumer recycled wood. In addition, our manufactured products are from certified forests and/or come from legally sourced timber managed through our Due Diligence System (DDS). All our UK harvested roundwood is purchased in line with the current UKWAS requirements.

### **Timber Industry & West Fraser:**

The UK Woodland Assurance Standard (UKWAS) is an independent certification standard for verifying sustainable woodland management in the UK that is used for chain of custody certification. This UK certification standard is designed to reflect the requirements set out in the governmental UK Forestry Standard and thereby the General Guidelines adopted by European Forestry Ministers at Helsinki in 1993, the Pan-European Operational Level Guidelines (PEOLG) subsequently adopted at Lisbon in 1998 and other relevant international agreements. All harvesting operations in the UK must comply with this standard. All our production sites hold ISO 14001:2014 Environmental Certification. West Fraser Europe Limited has implemented a Timber Procurement Policy as a commitment to the eradication of illegal timber.

Our Timber Procurement policy commitments are to not directly or indirectly be involved in the following activities:

1. Illegal logging or the trade in illegal wood or forest products
2. Violation of traditional and human rights in forestry operations
3. Destruction of high conservation values in forestry operations
4. Significant conversion of forests to plantation or non-forest use
5. Introduction of genetically modified organisms in forestry operations
6. Violation of any of the ILO (International Labour organisation) core conventions, as defined in the ILO Declaration on Fundamental Principles and Rights at work
7. Procurement of any forest products that have been purchased from countries under any UN government sanctions or timber sales that would financially support areas of conflict
8. Procurement of forest products that have been traded at some point by armed groups
9. Forest activities not complying with local, natural or international legislation
10. Procurement of products from; controversial sources, endangered and protected species including requirements of CITES (Convention on International Trade in Endangered Species).

### **Timber Raw Material Supply Chain:**

We verify our suppliers through an approval process under our ISO 3<sup>rd</sup> party certification process and in compliance with Sarbanes Oxley Act (SOX). As part of this process, the country of origin, species and certification status is checked. All our supply agreements are set up as contracts on our computer systems to monitor each transaction over our calibrated weighbridge. Our self-billing system is checked for any source, or supplier discrepancies by our Timber Administration Team. Where a discrepancy is identified, our Compliance Team will carry out an investigation.

Where we purchase raw material from UK and Europe, our control systems and due diligence systems ensure that we identify, trace and monitor inputs for legal status throughout our compliance auditing systems. This document provides information to meet both the requirements for EUTR/UKTR for all products manufactured by West Fraser Europe Limited. We are now actively working forwards compliance with the revised requirements for EUDR (EU Deforestation Regulations) in preparation for the compliance date of December 2024 and are actively working with our supply chains to gather the additional information required including forest geolocation data.

All our timber raw material inputs are traceable through our supply chains back to the source of origin, either directly from the forest or via our approved wood recycling suppliers. Our board products are sold as either FSC Mix (Certificate No: SA-CoC-008109, Licence Number FSC-C012533 or 70% PEFC certified (Certificate No: SA-PEFC-CoC-



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008109) depending on product type. Our systems are audited annually by our 3<sup>rd</sup> party certification body, The Soil Association.

Products	Manufacturing Site	Certified Claims	Control System
Medium Density Fibreboard (MDF) CaberMDF	Cowie, Scotland, United Kingdom	FSC Mix 73%	Percentage
CaberShield (PB) Loftspace (PB)	Cowie, Scotland, United Kingdom	FSC Mix 70%	Percentage
Oriented Strand Board (OSB) Sterling OSB Zero	Dalcross, Inverness, United Kingdom	FSC Mix 70% *70% PEFC Certified	Percentage Credit System
	Genk, Belgium	*FSC Mix Credit *70% PEFC Certified *PEFC Controlled Sources	Credit System
Roundwood Logs – Harvesting Operations	Dalcross, Inverness, United Kingdom & Genk, Belgium	FSC 100% FSC Controlled Wood 100% PEFC Certified PEFC Controlled Sources	Transfer System Dual Certification

*\*On Customer Order request & approved by West Fraser Compliance Team*

**Species Mix:** This list is monitored against the CITES list by our compliance team to ensure West Fraser do not use any products listed in any of the 3 appendices

Species Table			
Common Name	Latin Name	UK	Belgium
Sitka Spruce	Picea sitchensis	Y	Y
Norway Spruce	Picea abies	Y	Y
Hybrid Larch	Larix x eurolepis Henry	Y	N
Douglas Fir	Pseudotsuga menziesii	Y	N
Noble fir	Abies procera	Y	Y
Western Hemlock	Tsuga heterophylla	Y	N
Lodgepole pine	Pinus contorta	Y	N
Scots Pine	Pinus sylvestris	Y	Y
Birch	Betula Pendula & Butela Pubescens	Y	Y
Red Oak	Quercus Rubor	N	Y
Oak	Quercus Rubra & Quercus Petraea	N	Y
Ash	Fraxinus Exelcior	N	Y
Alder	Alnus Div	N	Y
Beech	Fagus Sylvatica	N	Y
Ahorn	Acer Div.	N	Y



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### Due Diligence & Monitoring:

As part of our supplier onboarding process, we obtain evidence to meet the Supply Chain Act and Modern Slavery Act in line with our policies. We continually monitor all our supply chains, contract performance and supplier details for accuracy as part of our internal audit system. We routinely select loads and conduct a full trace back to the forest of origin as part of our audits. Any country source that has a specific risk will not be approved for supply contracts unless the supplier can demonstrate that risk mitigations are established, this may lead to a full audit by a Timber Technical Expert. Where non-certified inputs are approved these are subject to individual risk assessments on a purchasing contract by contract basis.

We actively monitor countries under UN sanctions or areas of conflict/potential conflict and do not procure any raw material from these areas.

Countries under UN sanctions (Feb 2022)			
Afghanistan	Belarus	Bosnia & Herzegovina	Burundi
Central African Republic	Democratic People's Republic of Korea	Democratic Republic of Congo	Guinea-Bissau
Lebanon	Iran	Iraq	Libya
Mali	Myanmar	Nicaragua	Russia
Sudan	Somalia	South Sudan	Syria
Venezuela	Zimbabwe		

### Our Wood Supply Chain Country of Origins:

<b>Products: MDF, OSB, Particleboard – UK Sites</b>	
<b>Country of Origin</b>	<b>United Kingdom &amp; Northern Ireland</b>
FSC CNRA/NRA reference	FSC-NRA-GB V1-0 Approved 11 December 2018
Cat 1: Illegally Harvested Wood	Low Risk with evidence of felling licence or similar
Cat 2: Wood harvested in violation of traditional & human rights	Low Risk
Cat 3: Wood from areas of high conservation	Low Risk
Cat 4: Forest converted to plantations or non-forest use	Low Risk
Cat 5: Forests from genetically modified trees	Low Risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Controls Measures	Established local controls through supply chain
<b>Products: OSB – Inverness, United Kingdom &amp; Genk, Belgium</b>	
<b>Country of Origin</b>	<b>Latvia</b>
CNRA NRA reference	FSC-CNRA-LV V1-1 EN 6.28.2018
Cat 1: Illegally Harvested Wood	Low Risk with evidence of felling licence or similar
Cat 2: Wood harvested in violation of traditional & human rights	Low Risk
Cat 3: Wood from areas of high conservation	Specific Risk – purchasing from State Forestry only & verified by felling licence
Cat 4: Forest converted to plantations or non-forest use	Low Risk
Cat 5: Forests from genetically modified trees	Low Risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Controls Measures	Established local controls through supply chain
<b>Products: OSB – Inverness</b>	
<b>Country of Origin</b>	<b>Ireland</b>
CNRA NRA reference	FSC-CNRA-IE V1-0 EN
Cat 1: Illegally Harvested Wood	Low Risk with evidence of felling licence or similar
Cat 2: Wood harvested in violation of traditional & human rights	Low Risk
Cat 3: Wood from areas of high conservation	Low Risk
Cat 4: Forest converted to plantations or non-forest use	Low Risk
Cat 5: Forests from genetically modified trees	Low Risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Controls Measures	Established local controls through supply chain
<b>Products: OSB – Genk Site, Belgium</b>	



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<b>Country of Origin</b>	<b>Belgium</b>
CNRA NRA reference	CNRA FSC-CNRA-BE V1-00 EN 18.5.17
Cat 1: Illegally Harvested Wood	Low Risk with evidence of felling licence or similar
Cat 2: Wood harvested in violation of traditional & human rights	Low Risk
Cat 3: Wood from areas of high conservation	Low Risk
Cat 4: Forest converted to plantations or non-forest use	Low Risk
Cat 5: Forests from genetically modified trees	Low Risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Controls Measures	Established local controls through supply chain
<b>Products: OSB – Genk Site, Belgium</b>	
<b>Country of Origin</b>	<b>Netherlands</b>
CNRA/NRA reference	FSC-NRA-NL V1-0 26.6.2019
Cat 1: Illegally Harvested Wood	Low Risk with evidence of felling licence or similar
Cat 2: Wood harvested in violation of traditional & human rights	Low Risk
Cat 3: Wood from areas of high conservation	Low Risk
Cat 4: Forest converted to plantations or non-forest use	Low Risk
Cat 5: Forests from genetically modified trees	Low Risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Control Measures	Established local controls through supply chain & as defined above
<b>Products: OSB – Genk Site, Belgium</b>	
<b>Country of Origin</b>	<b>France</b>
CNRA/NRA reference	FSC-NRA-FR V1-0 8.8.2018
Cat 1: Illegally Harvested Wood	Low Risk with evidence of felling licence or similar
Cat 2: Wood harvested in violation of traditional & human rights	Low Risk
Cat 3: Wood from areas of high conservation	Low Risk
Cat 4: Forest converted to plantations or non-forest use	Low Risk
Cat 5: Forests from genetically modified trees	Low Risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Control Measures	Established local controls through supply chain & as defined above
<b>Products: OSB – Genk Site, Belgium</b>	
<b>Country of Origin</b>	<b>Germany</b>
CNRA NRA reference	FSC-NRA-DE V1-1 EN 2020-07-31
Cat 1: Illegally Harvested Wood	Low risk
Cat 2: Wood harvested in violation of traditional & human rights	Low risk
Cat 3: Wood from areas of high conversation	Low risk
Cat 4: Forest converted to plantations or non-forest use	Low risk
Cat 5: Forests from genetically modified trees	Low risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Controls Measures	Established local controls through supply chain
<b>Products: OSB – Genk Site, Belgium</b>	
<b>Country of Origin</b>	<b>Spain</b>
CNRA NRA reference	FSC-NRA-ES V1-1 10.5.2018
Cat 1: Illegally Harvested Wood	Low risk
Cat 2: Wood harvested in violation of traditional & human rights	Low risk
Cat 3: Wood from areas of high conversation	Low risk
Cat 4: Forest converted to plantations or non-forest use	Low risk
Cat 5: Forests from genetically modified trees	Low risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Controls Measures	Established local controls through supply chain
<b>Products: OSB – Genk Site, Belgium</b>	
<b>Country of Origin</b>	<b>Norway</b>
CNRA NRA reference	FSC-NRA-NO V1-0 27.8.2018
Cat 1: Illegally Harvested Wood	Low risk
Cat 2: Wood harvested in violation of traditional & human rights	Specific Risk – purchasing from areas outside Sami Districts
Cat 3: Wood from areas of high conversation	Specific Risk – Review for known protected zones and threatened species – continuous review



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Cat 4: Forest converted to plantations or non-forest use	Low risk
Cat 5: Forests from genetically modified trees	Low risk
Risk of Mixing	Risk Assessment Part II for non-certified inputs if applicable
Controls Measures	Established local controls through supply chain

### Complaints & Investigations:

In the event of a complaint against any of our products or our suppliers an investigation will be conducted in line with our controlled wood complaints procedure. The report will be issued to West Fraser’s Purchasing Director. Where unlawful practices are identified these will be reported to the applicable authorities. All raw material timber related complaints must be directed to Julie Turner, Group Compliance Manager (Julie.turner@westfraser.com) for West Fraser Europe Limited. You can also contact us at [responsible.sourcing.eu@westfraser.com](mailto:responsible.sourcing.eu@westfraser.com)

**References:** West Fraser: <https://www.westfraser.com/>, UKWAS: <https://ukwas.org.uk/>  
The Soil Association: <https://www.soilassociation.org/>, FSC: <https://fsc.org/>, Preferred by Nature: <https://preferredbynature.org/>, UK Timber Regulations: <https://www.gov.uk/guidance/regulations-timber-and-flegt-licences>