



Timber Due Diligence Statement – November 2023

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 3rd 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 outside the UK, our controls systems and due diligence systems ensure that we identify, trace and monitor inputs for legal status throughout our compliance auditing systems. With the UK leaving the EU on 1st January 2021; the EU Timber Regulations (EUTR) was replaced by the UK Timber Regulations (UKTR). Under UKTR, fundamentally there is no change in the requirements for businesses trading timber to know where the products were purchased from, the species, product, and country of origin. A large volume of raw material inputs into our Genk mill are procured from within the EU, this mill is classified as a Trader, unlike to UK Mills which are classified as Operators under the EUTR regulations. This document provides information to meet these requirements 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

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 products are sold as either FSC Mix (Certificate No: SA-CoC-00810, Licence Number FSC-C012533 or 70% PEFC certified (Certificate No: SA-PEFC-CoC-008109) depending on product type. Our systems are audited annually by our 3rd 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
Particleboard (PB) including CaberFloor, CaberDek	Cowie, Scotland, United Kingdom South Molton, Devon, United Kingdom	FSC Mix 70%	Percentage
CaberShield (PB)	Cowie, Scotland, United Kingdom	FSC Mix 70%	Percentage
Loftspace (PB)	South Molton, Devon, 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	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: UK Production (MDF, Particleboard & OSB + Harvesting)

The blend of species used in our production can be made up of any of the following species:

- 80% coming from Sitka Spruce (*Picea sitchensis*) and/or Norway Spruce (*Picea abies*)
- 20% coming from Hybrid Larch (*Larix x eurolepis* Henry), Douglas Fir (*Pseudotsuga menziesii*), Noble fir (*Abies procera*), Western Hemlock (*Tsuga heterophylla*), Lodgepole pine (*Pinus contorta*), Scots Pine (*Pinus sylvestris*).

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 Mix: Genk Production (OSB)

The blend of species used in our production is PINE (*Pinus sylvestris*, *Pinus contorta*, *Pinus Rigida*, *Pinus Maritima*, *Pinus Corsica*, *Pinus Nigra*), SPRUCE (*Picea Sitchensis*, *Picea abies*, FIR (*Abies grandis*, *Abies procera*, *Abies.....*), (Hybrid; *Larix x eurolepis* Henry & European; *Larix decidua*), FIR (Douglas; *Pseudotsuga menziesii*), BIRCH (Betula Pendula & Butela Pubescens) RED OAK (*Quercus Rubor*), OAK (*Quercus Rubra* & *Quercus Petraea*), ASH (*Fraxinus Exelcior*), ALDER (*Alnus Div.*), BEECH (*Fagus Sylvatica*), AHORN (*Acer Div.*)

Due Diligence & Monitoring:

We continually monitor all our intakes, contract performance and supplier details for accuracy as part of our internal audit system. On a quarterly basis we select loads and sample these by conducting a full trace back to the forest of origin. In addition, on an annual basis we check all our country sources for changes. 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		

The country of origin timber risk ratings are considered as follows:

Products: MDF, OSB, Particleboard – UK Sites	
Country of Origin	United Kingdom & Northern Ireland
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
Controls Measures	Established local controls through supply chain
Products: OSB – Inverness, United Kingdom & Genk, Belgium	
Country of Origin	Latvia
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
Areas under UN Sanctions	Low with evidence of Risk Assessment Part II
Controls Measures	Established local controls through supply chain
Products: OSB – Inverness	
Country of Origin	Ireland
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
Areas under UN Sanctions	Low with evidence of Risk Assessment Part II
Controls Measures	Established local controls through supply chain
Products: OSB – Genk Site, Belgium	
Country of Origin	Belgium
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
Areas under UN Sanctions	Low with evidence of Risk Assessment Part II
Controls Measures	Established local controls through supply chain
Products: OSB – Genk Site, Belgium	
Country of Origin	Netherlands
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	Low with evidence of Risk Assessment Part II
Control Measures	Established local controls through supply chain & as defined above
Products: OSB – Genk Site, Belgium	
Country of Origin	France
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	Low with evidence of Risk Assessment Part II
Control Measures	Established local controls through supply chain & as defined above
Products: OSB – Genk Site, Belgium	
Country of Origin	Germany
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	Low with evidence of Risk Assessment Part II
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. 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.

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>