

SWI HOUTIMPORT RESPONSIBLE SOURCING POLICY

1. Commitment by the Management

SWI Houtimport is committed to procuring products that are sourced from well-managed forests. Primarily to that commitment, we pursue a responsible sourcing protocol to promote the use of legal and environmentally responsible to rest products.

SWI Houtimport commits itself it shall not involve and not work with suppliers that engage in the following activities:

- illegal logging or trade in illegal wood and wood products.
- violation of traditional and human rights in forestry operations.
- destruction of High Conservation Values in forestry operations.
- significant conversion of forests to promotions or non-forest use.
- introduction of genetically modified organisms in forestry operations.
- violation of any of the ILO Core Conventions, as defined in the Fundamental Principles and Rights at Work.

2. Legality

We are committed to sourcing only wood material that has been produced, processed, and traded in compliance with applicable legislation in the country where the trees were harvested, as well as along the entire supply chain.

By applicable legislation, we refer to the following types of legislation applicable to harvest and trade of forest products. This definition is intended to meet the EU Deforestation Regulation:

1. Legal right to harvest

- 1.1 Land tenure and management rights
- 1.2 Concession licenses
- 1.3 management and harvesting planning
- 1.4 Harvesting permits

2. Taxes and fees

- 2.1 Payment of taxes, royalties and harvesting fees
- 2.2 Value-added taxes and other sales taxes
- 2.3 Income and profit taxes

3. Timber harvesting activities

- 3.1 Timber harvesting regulations
- 3.2 Protected Sites and species
- 3.3 Environmental requirements
- 3.4 Health and safety
- 3.5 Legal employment

4. Third parties' rights

- 4.1 Customary rights
- 4.2 Free, Prior and Informed Consent (FPIC)
- 4.3 Indigenous and traditional peoples' rights

5. Trade and transport

- 5.1 Classification of species, quantities and qualities
- 5.2 Trade and transport
- 5.3 Offshore trading and transfer pricing
- 5.4 Customs regulations
- 5.5 CITES

Additionally, we are committed to taking all measures to avoid wood material obtained from the following sources:

- Countries with Sanctions imposed on timber imports or exports by the UN Security Council or the EU Council.
- Countries or areas with prevalence of armed conflicts, for which conflict timber may be a concern. The term conflict timber is used to describe the harvesting or trade of forest products used to fund parties engaged in armed conflicts resulting in serious violations of human rights, violations of international humanitarian law or violations amounting to crimes under international law.

Supply chain management and information

We will ensure that information about suppliers and sources of material is collected and evaluated to enable effective risk assessment.

Risk Assessment and Mitigation

We will carry out risk assessment of all suppliers and supplies of wood to evaluate the risk that the material or products being sourced originate from an illegal source or have been illegally traded. In case risks are identified and cannot be classified as negligible we will carry out appropriate risk mitigating actions to avoid any potential risk.

Monitoring and Verification

We will carry out applicable monitoring of internal systems and procedures. As necessary and applicable, access will also be made for external audits, to allow verification that the relevant systems are in place and implemented as required.

3. Environmental responsibility

We are committed to promoting responsible stewardship toward the environment and its natural resources. We are committed to reducing the impact on the environment caused by our own activities or those activities carried out by our suppliers.

Since the year 2000 we have been recording the sources of our wood and as such exceeding applicable environmental legislation at the time. Companies who have participated over 3 years and who have incorporated the 17 Sustainability Goals of the United Nations will receive from CIFAL FLANDERS an UNITAR certificate (United Nations Institute for Training and Research).

Certification

We are committed to procuring wood products that have been certified against an internationally recognized standard for responsible forest management, where possible, to ensure that the material originates from a well-managed forest. Certified timber contributes to the 17 Sustainable Development Goals of the United Nations. By 2024, we aim to import certified timber only. For 2023 we are at 97% of certified timber imports already.

Continuous improvement

We hereby commit to continuously improve the sustainability level of our sourcing by:

- Accurately assessing the countries of origin and if necessary, each single supplier.
- Continually improve our products and systems that ensure the traceability and performance of our suppliers.
- Favouring stricter and more credible certification and verification standards and sourcing requirements, and by avoiding sourcing from unknown or unsustainable sources.

Social responsibility

We are committed to avoid engaging in or benefitting from controversial business practices, such as, but not limited to:

- Any form of forced labour, including bonded labor, forced prison labor, slavery or human trafficking.
- The use of child labour. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years.
- Discrimination on the basis of race, colour, sex, language, religion, political or other opinion, caste, notional or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age, and disability or other distinguishing characteristics.
- Unsafe or unhealthy working environments, including, but not limited to, risk from fire, noise, accidents and toxic substances. Adequate health and safety policies and procedures must be established and followed by all companies in our supply chains.

If we become aware that any of these issues are relevant in our organisation or any of our suppliers, we are committed to taking relevant steps to mitigate any such situation.

5. Review and adaptation of this policy

This policy, and related documents, are periodically reviewed revised where appropriate.

6. Communications and stakeholders

This policy shall be made publicly available on our [website](#) and will be communicated to suppliers and interested parties. Each supplier must adhere to our commitment by:

- Assuring compliance with national and international legal requirements.
- Respecting fundamental human rights.
- Avoiding adverse impacts on communities.
- Adopting ethical business practices.

Date: 7 January 2021

Signed by: Erik Sneek