

Policy Commitment of responsible, sustainable and legal forest management of La Compagnie Forestière et de Transformation

1. Commitment by the Management

La Compagnie Forestière et de Transformation is committed to ensuring that the harvesting, transformation, transport and trade of its timber and timber products are carried out in accordance with all applicable national legislation and credible forest management certification standards. As a cornerstone of that commitment, we will maintain our Due Diligence System (DDS) to manage the risks of non-compliance.

2. Legality

We are committed to responsible and sustainable forest management, in compliance with applicable legislation.

By applicable legislation, we refer to the following types of legislation relating to the harvest and trade of forest products. This definition is intended to meet international requirements such as those adopted in the EU Timber Regulation, the US Lacey Act and the Australian Illegal Logging Prohibition Act:

1. Legal rights to harvest

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

2. Taxes and fees

- 2.1 Harvesting taxes, levies and 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
- 5.2 Transfer pricing
- 5.4 Customs regulations
- 5.5 CITES

Chain management and information

We will ensure that the information about our production, from its source in the forest right through until it is exported, is collected and evaluated to enable effective risk assessment and traceability.

Risk assessment and mitigation

We will carry out due diligence on a risk-based approach under which legal requirements are identified, and potential risks of legal non-compliance in the forest management and harvesting operations are specified. In case risks are identified and cannot be classified as negligible we will carry out appropriate risk mitigating actions.

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.

Certification

We are committed to maintaining our NEPCon LegalSource certification whilst working towards other international recognised certification standards for responsible forest management

Continuous improvement

We hereby commit to continuously improve the sustainability level of our forest management.

4. 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, forced prison labour, slavery, servitude, 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, national 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

We will ensure that this policy, and related documents, are periodically reviewed and appropriately revised.

6. Communications and stakeholders

This policy shall be available publicly and will be communicated to suppliers and interested parties.


The Management
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