

Wickes Group Plc - Timber Sourcing Policy

At Wickes, Timber is the largest single source of renewable material in our business and we recognise that all efforts must be made to ensure our legal and ethical obligations are met or exceeded.

This means we only **source our timber and timber products from legal, sustainable sources.**

Quick Read

What does this policy address

This policy defines the steps we need to take in order to source our timber and timber products from legal and sustainable sources. The UK Timber Regulation (UKTR) (formally EUTR) prohibits the placement of illegally harvested timber and products derived from illegal timber on the UK market. The regulation requires anyone handling wood or wood products to assess the risk that those products may have come from an illegal source, and to act to mitigate that risk. This policy addresses both timber legality and timber certification.

Doing the Right Thing

Responsible Purchasing

- We will comply with all relevant timber regulations for the countries in which we operate.
- We will risk-assess all timber suppliers and products in order to identify and mitigate high risks.
- We will develop a science based testing programme to establish and verify any higher risk documented supply chains using 3rd party expertise in the area of Isotope and DNA testing for high risk products
- We will aim to utilise 3rd party expertise, where available, to monitor forest degradation and deforestation through the use of satellite forestry imagery. The same technology is also being explored to identify other potential risks e.g flooding & forest fire.
- We will undertake enhanced due diligence where we are the first placer of timber on the UK market.
- We will source only certified timber, using FSC or PEFC certification schemes.
- We will make guidance available to suppliers to support their own timber due diligence.
- We will respond to and resolve any issues, incidents and non-conformities to continually improve.

Responsible Selling

- We will identify on both product and website the certification scheme (FSC/PEFC)
- We will comply with all relevant standards and testing in relation to structural timbers
- We will mark products timber products as required under UK law with the UKCA/CE mark
- We will be clear at the point of sale / website on product use and limitations

What this means for you

All officers, employees, agents and temporary workers:

- **Do** purchase timber or timber-containing products from approved suppliers only.
- **Do** alert the Responsible Sourcing team to any timber sourcing so that legal checks can be conducted.
- **Do** report any known or suspected timber issues to your line manager or to the Responsible Sourcing Team at: compliance@wickes.co.uk or via our anonymous Whistleblowing line 0800 949 6396 or via our anonymous [Whistleblowing portal](#).

Who does this policy apply to

This policy applies to all officers, employees and temporary workers (such as consultants, contractors, casual and agency staff) of Wickes Group Plc ("the Company") and its subsidiaries (together "colleagues").

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Where to go for help

Policies and guidance can be found [here](#) under 'Business Ethics - Doing the Right Thing' and you can also speak to your line manager or contact the Legal team for advice.

Failure to comply

Failure to comply with this policy, intentional or otherwise, may lead to disciplinary action (up to and including dismissal). In addition, failure to comply with specific regulations (see below) may result in penalties for Wickes.

Approved by the Wickes Group Plc Executive Board on 9 January 2023

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1. Introduction

In line with our Supplier Commitments, Wickes works hard to ensure that all timber and timber products are sourced responsibly and legally, and without causing deforestation or degradation.

Deforestation: A net decrease in the area covered by forest.

Degradation: Changes within the forest, such as overexploitation and disease, which have been caused by human activity and which reduce the forest's quality and function, therefore lowering its capacity to supply products.

To achieve this, we purchase material which complies with the UK Timber Regulation and has a Chain of Custody certified by either the Forest Stewardship Council (FSC[®]) or the Programme for the Endorsement of Forest Certification (PEFC).

2. Scope

This policy applies to all officers, employees and temporary workers (such as consultants, contractors, casual and agency staff) of Wickes Group Plc ("the Company") and its subsidiaries (together "colleagues"). It is our joint responsibility to ensure that we comply with this policy in our daily working lives regardless of whether local law or practices might permit something to the contrary.

3. What are the UK Timber Regulations?

The UK Timber Regulation bans the importation of illegal timber into the UK. They require anyone handling wood or wood products to assess the risk that those products may have come from an illegal source, and to act to mitigate that risk.

Where our business imports timber directly into the UK, we are classified as an **"Operator"** and we are responsible for undertaking due diligence all the way back to the forest to ensure the timber is legal (i.e. not protected species) and that it has been legally harvested (i.e. not from protected areas or in excess of logging quotas for that country). We use an expert third party, Track Record Global, to undertake this due diligence. Where our business purchases timber already within the local market we are classified as a **"Trader"** and we expect our suppliers to have undertaken the same due diligence and we request only certified timber (FSC or PEFC) and verify this to have greater confidence in their compliance.

Products in scope

The Regulation covers a broad range of timber products including solid wood products, flooring, plywood, pulp and paper. Not included are recycled products, as well as printed papers such as books, magazines and newspapers.

"Timber and timber products" means the timber and timber products set out in Appendix 1, with the exception of timber products or components of such products manufactured from timber or timber products that have completed their lifecycle and would otherwise be disposed of as waste.

The Regulation applies to both imported and domestically produced timber and timber products. Timber and timber products covered by valid [FLEGT](#) or [CITES](#) licences are considered to comply with the requirements of the Regulation.

Operator requirements: We are considered an operator if:

- We are the first placer of the timber or timber-containing product onto the UK market (i.e. we are the importers of that timber from outside of the UK)

Extract from Gov.uk website:

Operators must not place illegally harvested timber on the market and to avoid doing so must apply a due diligence system, under which they:

- gather information on timber, including its species, quantity, supplier, country of harvest and compliance with applicable legislation
- assess the risk of timber being illegal, applying set criteria in the regulations
- mitigate any identified risk, by obtaining additional information or taking further steps to verify legality

All species in composites must be considered separately, but where they are a mix of virgin and recycled timbers, only the former need to be assessed.

Operators can either develop their own due diligence systems or use one provided by an approved monitoring organisation.

The following checklist is used to review due diligence systems by officers from the Office for Product Safety and Standards (OPSS) and is provided for reference. It indicates the information that operators need to demonstrate compliance. (The depth of supporting evidence required varies with risk, depending on factors such as the complexity of the supply chain, species risk, country risk and the nature of the product.)

The following data must be tracked for all timber or timber-containing products for which we are an operator:

- Scientific and common name for the species of timber
- Country of harvest
- Volume of timber or timber products purchased
- Name and address of the timber or timber products supplier
- Name and address of the customer the timber or timber products were sold to
- Other documents or information to indicate compliance with the applicable legislation

Additionally, note that any timber imported from countries that have implemented voluntary partnership agreements (VPAs) with the EU – currently only Indonesia – must be accompanied by a forest law enforcement, governance and trade (FLEGT) licence. Operators should obtain these from the supplier and submit them to OPSS at flegtenquiries@beis.gov.uk for verification before the customs declaration is made, together with a completed copy of the following form. This submission may be made on behalf of the operator by a third party, such as an agent or freight forwarder. Once verified, the relevant timber is considered legal, removing the obligation to exercise due diligence.

[FLEGT licence information sheet](#) (PDF, 129KB, 2 pages)

Our monitoring organisation, Track Record Global, conducts the risk assessment on our behalf, taking into account:

- Compliance with applicable legislation, including certification and other third party schemes
- Prevalence of illegal harvesting in the country of harvest and/or sub-national region where the timber was harvested
- Prevalence of illegal harvesting of the specific tree species
- Sanctions imposed by the UN Security Council on timber imports or exports against the country of origin
- Complexity of the supply chain of timber and timber products

Each supply chain is attributed a risk level of either Negligible or Non-Negligible. Only negligible timber and timber products can be traded through our businesses. If any non-negligible (higher risk) timber is identified, a full investigation will be undertaken and either mitigating actions put into place or alternate sources found.

Trader requirements: We are considered a trader if:

- We purchase timber or timber-containing product which has already been imported by another organisation onto the UK market

Traders must keep records of who they buy timber or timber products from, and any traders they sell them to. We have established procedures to ensure compliance with legal requirements.

4. What is Timber Certification?

The **FSC** (Forest Stewardship Council) and **PEFC** (Programme for the Endorsement of Forest Certification) are international, non-profit, multi stakeholder organisations that promote sustainable forest management through independent third party certification. We work with our suppliers to make sure all the timber and timber fibre products we purchase come from certified FSC or PEFC sources. Wherever possible, and always within our business certified to one of these standards, this should be full Chain of Custody certified with a claim of at least 'FSC Mix' or 'PEFC 70%'.

We'll only accept products without FSC or PEFC Chain of Custody certification where prior approval has been granted by exception after a formal risk assessment. We'll take swift and prompt action to remove any timber from our business if we receive credible information that it doesn't meet our policy requirements or values.

Should the credibility of a certificate or mitigating information be in doubt, we may apply additional verification measures or obtain further assurances that a source is in line with our policy and values. This could include third party isotope, DNA or fibre testing to validate species and country of origin claims.

5. Compliance with Policy

Failure to comply with this policy, intentional or otherwise, may lead to disciplinary action (up to and including dismissal). In addition, failure to comply with specific regulations (selected examples below) may result in the listed corporate penalties.

6. Reporting Concerns

If you are concerned about a product or supplier issue, then you should speak up. Discuss your concerns with your line manager and notify the Responsible Sourcing team. Additionally our Whistleblowing line (0800 949 6396) or our [Whistleblowing portal](#) can be used to raise any concerns anonymously.

We know it takes courage to speak up and you will not suffer any detrimental treatment as a result of raising a genuine concern. Please see our [Whistleblowing Policy](#) for more information.

7. Related Policies

[Whistleblowing Policy](#)

[Modern Slavery and Human Trafficking Policy](#)

[Anti-Bribery and Corruption Policy](#)

[Competing Fairly Policy](#)

[Responsible Sourcing Policy](#)

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