



Elliott Baxter Responsible Purchasing Policy

The Elliott Baxter Group of Companies is committed to purchasing timber products responsibly. Our intention is that all products that we purchase are sourced from a well-managed forest that has been certified to credible certification standards and/or are from post-consumer recycled materials.

Legality

This Policy Statement reflects our obligations in meeting the UK Timber Regulation's requirements for due diligence.

Under the UK Timber Regulation, anything that is supplied from the UK and we then sell onto our customers makes Elliott Baxter a Trader. Anything that we place on the UK market for the first time makes Elliott Baxter an Operator.

Trader Obligations:

Traders shall, throughout the supply chain, be able to identify the operators or the traders who have supplied the timber and timber products.

Traders shall, throughout the supply chain, be able to identify, where applicable, the traders to whom they have supplied timber and timber products.

Trader regulations

As a Trader we need to show

- i. Details of suppliers for a 5-year period
- ii. Details of customers for a 5-year period.

Operator Obligations:

As an Operator we need to show

- i. Due Diligence
- ii. Risk Assessment
- iii. Mitigation of the risk identified.

Operators must have measures and procedures providing access to information concerning the operator's supply of timber or timber products placed on the market. This includes examination of the due diligence system, including risk assessment and risk mitigation procedures, and examination of documentation and records that demonstrate the proper functioning of the due diligence and procedures.

Elliott Baxter has a responsibility under the UK Timber Regulation to carry out Due Diligence to prevent the placing of illegally harvested timber on the UK market.

All our suppliers will receive regular checks to ensure that to the best of our knowledge, our products have a negligible risk of illegal origin.

Our Due Diligence information does not need to be known by our customers, who will be acting as traders. However, our customers will need to keep our information, as a supplier, for five years and provide this to the relevant authorities if required.

Elliott Baxter will not purchase any timber products if the following apply:

- The source forest is known or suspected of containing high conservation values, except where the forest is certified or in the process of being certified under a credible certification scheme.
- The source forest is being actively converted from natural forest to a plantation or other land use, unless the conversion is justified, including the enhancement of high conservation values in the surrounding landscapes.
- The material was illegally harvested or traded
- The material was traded in a way that drives violent armed conflict or threatens national or regional stability.
- The harvesting or processing entity is violating human rights



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- The source forest is unknown.
- Timber originated from countries with an active UN or EU Trade sanction

Environmental responsibility

Elliott Baxter hold FSC and PEFC accreditation as well as ISO 9001, ISO 14001 and ISO 50001. We will so far as is reasonably practicable:

- Comply with all relevant environmental laws and regulations both locally and nationally.
- Ensure that sub-contractors and suppliers apply equivalent environmental standards.
- Make environmental information about the products that we stock available to our customers.
- Recycle office waste and defective stocks.
- Purchase lower emission commercial vehicles and company cars where appropriate.

As UK's leading paper and paperboard merchant, our aim is to combine service excellence with an environmentally friendly approach, setting the standards for best practice in our industry.

Our commitment to continually minimise our impact to the environment demonstrates how seriously we take this issue. We will set objectives and targets to help us achieve this commitment. The success of this policy relies on everyone being actively involved. We all have a valuable role to play in showing that good environmental policy at work is good business.

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, 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.

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

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

Matt Elliott
Managing Director
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