

# Vandecasteele Houtimport Responsible Sourcing Policy

## 1. Commitment by the Management

Vandecasteele Houtimport is committed to procuring products and services that ensure that materials are sourced from legal and well-managed forests. As a cornerstone of that commitment, we pursue a responsible sourcing programme to promote the use and marketing of legal and environmentally responsible forest products.

Vandecasteele Houtimport commits itself to the FSC values as defined in FSC-POL-01-004 : Policy for the Association of Organizations with FSC.<sup>1</sup>

## 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 originally 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 Timber Regulation:

### 1. Legal rights 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
- 5.2 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<sup>2</sup>.

## 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.

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<sup>1</sup> <https://fsc.org/en/document-centre/documents/resource/368>

<sup>2</sup> Alexandra Pardal, Campaign Leader, Global Witness. 'Conflict timber and the EU's FLEGT programme: the case of Central African Republic.' (Presentation given at EU FLEGT week conference, Brussels 18 March 2015)

### 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 and sub-suppliers.

Since the year 2000 we manage this through the Corporate Sustainability Charter by signing up to environmental objectives exceeding applicable environmental legislation. 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). In 2020 we were the first timber company in the world that received the Unitar Cifal "[SDG pioneer](#)" certificate.

### 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 2025, we aim to trade certified timber only.**

### 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.

## 4. Social responsibility

In the application of the FSC core labour requirements, we shall give due consideration to the rights and obligations established by national law, while at the same time fulfilling the objectives of the requirements.<sup>3</sup>

- The organization shall not use child labour.
  - The organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in the next paragraph.
  - In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal day-time working hours.
  - No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulations.
  - The organization shall prohibit the worst forms of child labour.
- The organization shall eliminate all forms of forced and compulsory labour.
  - Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.
  - There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:
    - physical and sexual violence
    - bonded labour
    - withholding of wages /including payment of employment fees and or payment of deposit to commence employment
    - restriction of mobility/movement

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<sup>3</sup> Source: FSC report on generic criteria and indicators based on ILO Core Conventions principles (2017)

- retention of passport and identity documents
- threats of denunciation to the authorities.
- The organization shall ensure that there is no discrimination in employment and occupation.
  - Employment and occupation practices are non-discriminatory.
- The organization shall respect freedom of association and the effective right to collective bargaining.
  - Workers are able to establish or join worker organizations of their own choosing.
  - The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.
  - The organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.
  - The organization negotiates with lawfully established workers' organizations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.
  - Collective bargaining agreements are implemented where they exist.

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 and appropriately revised.

## 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 impact on communities.
- Adopting ethical business practices.

Date: 9<sup>th</sup> January 2023

Signed by:   
Stefaan Vandecasteele