



ELLIOTT BAXTER & COMPANY LIMITED

Head Office: Nexus Park, Lysons Avenue,
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www.ebbpaper.co.uk

EBB's Purchasing Policy to comply with EUTR

Elliott Baxter 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.

We act as both a Trader and an Operator in the new regulation. Anything that is supplied from the EU and we then sell onto our customers makes us a Trader. Anything that we place on the EU market for the first time makes us 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. Migration 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 migration procedures, and examination of documentation and records that demonstrate the proper functioning of the due diligence and procedures".

The procedures put in place will depend greatly if the product is certified under a forest certification scheme or not.



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Due diligence needs to be supplied by each supplier for each product within a period not exceeding 12 months. There is no obligation to have the due diligence system independently audited by a third party.

In the end, we are responsible for appraising the extent to which the information received will fulfil any obligations you have under the regulation.

Please see the flow diagrams below to follow the procedure that we need to follow if we are an operator. All other information can be found in the PAS 2021:2012 in the EUTR folder.

Elliott Baxter has a responsibility under the EU Timber Regulation to carry out due diligence to prevent the placing of illegally harvested timber on the EU 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.

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
- The source forest is unknown.

A handwritten signature in black ink that reads 'Matt Elliott'.

Matt Elliott
Managing Director
January 2021