Statement of compliance to Regulation 995/2010 (European Timber Regulation)

Wednesday, 16 October 2013

To whom it may concern,

Antalis is an International paper merchant that purchases paper and board products from many different countries.

In the United Kingdom the products purchased by Antalis for sale to its UK customers are from suppliers all within the internal market and therefore under this Regulation Antalis is regarded as a Trader under article 5.

Early engagement with regulated entities

The National Measurement Office, the appointed competent authority by the secretary of state for the department of food, Environment and Rural Affairs in the United Kingdom for Regulation (EU) 995 2010, identified Antalis as a potential operator and conducted a formal enquiry of Antalis products on 7th October 2013.

The appropriate information was submitted to the National Measurement Office and a formal acknowledgment and closure was received on 11th October 2013.

If you have any questions please don’t hesitate to call me directly.

Yours faithfully,

Matthew Botfield
Environment Manager
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Sustainable Woodpulp and Paper Sourcing

Sequana’s policy for the sustainable sourcing of woodpulp and paper

1. General context

2. General sourcing
   2.1 Responsible operations
   2.2 Sustainable forest management, traceability and forest certification
   2.3 Genetically Modified Organisms
   2.4 Stakeholders relations

3. Pulp and Paper for Recycling

December 2013
1. General context

Sequana recognizes the importance of using timber from legal, sustainable and well managed sources. We are committed to using timber from these sources, and supporting initiatives and forestry management schemes that promote this. The ability of our suppliers to deliver to these standards is a core requirement of our general responsible sourcing policy.

This policy is based on Sequana’s values, and aligned with Sequana’s Code of Business Conduct and other related policies and guidelines. Sequana will apply this policy in all fiber and paper sourcing operations including:

1.1 External purchases of pulp

- External purchase of paper

This document applies to Sequana and its entities Arjowiggins Sourcing Limited, Arjowiggins Graphic, Arjowiggins Security, Arjowiggins Creative Papers, Arjowiggins Healthcare, PPNA and Antalis.

This policy sets out a framework for implementing, monitoring and improving the environmental and social responsibility of the company's operations. We will actively strive to enhance the monitoring, reporting and third-party verification of our performances related to these principles wherever they apply.

Sustainable Sourcing is one of the eight initiatives identified for the group to be core Corporate and Social Responsibility priorities. The commitment of the Group is to do all it can to ensure that its pulp supply (for its papermaking activity) and paper (for its paper distribution activity) is coming from legal sources; and to give priority to internationally recognized certification standards like FSC or PEFC.

2. General sourcing

2.1 Responsible operations

We will meet all applicable policy, legal and regulatory, defined in countries and regions where we operate.

We implement environmental management systems, occupational health and safety systems and technologies that enable us to recognize and assess the impacts of our operations, allowing us to continuously improve our sustainability performance.

We do not procure fiber or paper coming from wood which has been:

- Illegally harvested;
- Logged in protected areas or areas currently undergoing official processes of designation for protection, unless the logging is clearly in line with national conservation regulation;
- Harvested in forests where High Conservation Value has been defined by the High Conservation Value Resource Network (HCVRN) and duly interpreted through balance stakeholders processes are threatened by logging;
- Sources from areas undergoing conversion from forest or other wooded ecosystems to plantation or non-forest uses, unless such conversion is justified on grounds of net social and environmental gain;
- Or Harvested in violation of traditional rights or civil rights.

2.2 Sustainable forest management, traceability and forest certification

We support sustainable forest management and promote forest certification on all land used to supply us with fiber and paper, so as to protect, verify and communicate a wide range of economic, social and environmental values. The group aims to increase year after year the percentage of certified pulp or paper in its production or distribution activities.
We utilize traceability systems to ensure that all fiber we use originates from legal sources. For the pulp sourcing, 100% of the supply is verified by third party through the Chain of Custody; for the paper supply, we strive to obtain third party verification of these systems through the Chain of Custody and FSC Controlled Wood schemes or PEFC scheme.

We also support credible forest certification systems. A credible forest certification system must:
- Take into account national and regional characteristics such as natural conditions, forest ownership structures and legislation, to ensure they are widely applicable;
- Formulate certification criteria through open and balanced stakeholder dialogue;
- Include balanced social, economic and environmental aspects in their criteria;
- Promote continuous improvements;
- Require independent third party audits, including on the field; and
- Complement the environmental and quality management system used in wood procurement.

2.3 Genetically Modified Organisms

We refrain from the commercial use of Genetically Modified Organisms (GMOs) resulting from controversial genetic engineering techniques.

We will allow the use of non-controversial commercially available process additives derived from organisms that have been genetically engineered in pulping, papermaking, and bio-refining applications.

2.4 Stakeholders relations

We maintain and enhance the long term health, well-being and diversity of employees through proactive workplace safety and personnel development programs and, offer related training whenever possible.

We contribute to the improvement of economic conditions and create opportunities for local people to share in the economic and social benefits our activities create in communities where we operate.

Recognizing the unique economic and cultural needs of indigenous people, we promote wood and fiber procurement and forest management practices that respect their traditional uses of forests.

We promote the sustainability of our wood and fiber sources through ethical purchasing practices and by offering long-term partnerships to our suppliers.

3. Recycled materials

We strive to ensure that recycled material makes up a considerable share of our raw material, particularly at paper mills. We contribute to efforts to further increase the already high European collection rate for Recycled paper. We aim to procure Recycled material within a short distance from mills in order to optimize logistics and minimize the carbon footprint of the related transportation.

Knowing that recycled pulp or paper have a lower impact on environment (lower impact on the natural resource and lower manufacturing –energy and water- impact) the group aims to give priority and to encourage, the consumption of recycled paper.

Pascal Lebard
Chairman and Chief Executive Officer of Sequana
and CEO of Antalis and Arjowiggins