



# Timber Sourcing Policy

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'Accountable' owner: Chief Commercial Officer  
'Responsible' owner: Head of Sourcing



## Version Control

Version	Author name	Version changes	Date	Next review date
V1.0	Stuart Wharton		April 2022	April 2023
V2.0	Stuart Wharton		October 2022	April 2023
V3.0	Joseph Danson	New Format, new risk assessment framework	May 2024	May 2025

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## 1. Policy Statement

This Policy establishes a set of principles and rules adopted by The Very Group Limited ('TVG') in relation to our sourcing of Timber. This Policy is designed to influence all decisions, actions and other activities that relate to its subject matter.

The primary objectives of this Policy are to:

- Ensure that The Very Group meets its sustainability commitments, targets, and legal obligations with regards to timber products
- Set out our sourcing requirements for suppliers
- Clearly communicate how we categorise the timber we source

Not currently included in the scope this policy:

- Non-timber forest products (refer to Forest Protection policy 2024 for MMCF)
- Goods not for resale
- Packaging & Paper (refer to 'Forest Protection Policy')

## 2. Background

TVG recognise the need to be responsible regarding conservation of the World's forests and halting deforestation. TVG is committed to ensuring the protection of the world's forests in our own brand supply chains. The Very Group will achieve this by complying with key legal and compliance requirements, undertaking a risk assessment for wood materials and including a commitment to sourcing certified sustainable products.

### 3. Key legal and compliance requirements

TVG is committed to ensuring that it complies with all legal and regulatory requirements when conducting its business activities. In relation to the activities relevant to this Policy, the key legal and regulatory considerations are:

UK Timber Regulation (UKTR)  
UK Forest Law Enforcement Governance and Trade (UK FLEGT)  
EU Timber Regulation (EUTR)

### 4. Timber Sourcing Policy

#### 4.1 Our Commitment

We understand the important role forests play in protecting our planet against climate change, that is why we are committed to Zero Deforestation in our supply chain by 2025. To achieve this, we are committed to sourcing 100% FSC® or equivalent timber in our furniture by 2025.

As a minimum, we risk assess all timber products to verify that the material used was harvested, traded, and transported in compliance with the applicable legislation in the country of origin in line with the UK and EU Timber Regulations, and ensure relevant risk mitigation is followed.

#### 4.2 Scope

This policy applies to all Very Group own brand furniture products made of, or containing, the following:

- Solid timber
- Components or parts made of timber
- Timber composites such as MDF and particleboard
- Recycled timber

#### 4.3 Requirements

Each timber product and the material used to manufacture them are assessed to determine their timber policy category:

- 1. Legal & responsible sources;** Legal sources as well as an in-house risk assessment
- 2. Certified sustainable;** Certified through a recognised scheme (FSC® or PEFC)

Our requirements table sets out clear expectations for our suppliers, manufacturers, agents, and sourcing operations as well as the role we will play in ensuring policy compliance.

The Very Group expects all existing, and any future suppliers, to align with the expectations set out in this policy.

## 5. Monitoring

We will monitor and assess our supply chains containing timber and will take a risk-based approach to ensure supplier compliance with our policy and commitments.

### The Very Group will:

- Require suppliers to disclose their timber sources and submit all relevant information and supporting documentation to help demonstrate compliance.
- Provide training and additional guidance to our Category teams and suppliers on the implementation of this policy and its implications.
- Review and update this policy periodically.

### 5.1 Categorisation requirements

<b>Categorisation requirements</b>	
<b>Legal and responsible sources</b>	<p>All suppliers of products containing timber must continually demonstrate traceability and be able to prove that the timber used was legally harvested including compliance with the applicable legislation in the country of origin and in-line with the EU Timber Regulation (995/2010), UK Timber regulation (UKTR) and UK FLEGT.</p> <p><b>The EUTR risk assessment considers the following:</b></p> <ul style="list-style-type: none"> <li>• Country of Harvest</li> <li>• Species</li> <li>• Supplier location/information</li> <li>• Factory location/information</li> </ul> <p>All products are given a risk rating which determines the level of risk mitigation required, and any changes to timber sources will require risk assessment to be carried out again.</p> <ul style="list-style-type: none"> <li>• Low Risk - Provide self declaration of EUTR/UKTR compliance at the beginning of the season.</li> <li>• Medium Risk – Provide self declaration of EUTR/UKTR compliance, with complete Chain of Custody prior to every shipment.</li> <li>• High Risk – Provide self declaration of EUTR/UKTR compliance prior to every shipment, as well as 3<sup>rd</sup> party audit to authenticate CoC, and time frame to be agreed to move timber source into a timber certification scheme such as FSC®.</li> </ul> <p><b>Species scope:</b></p> <p>Products should not contain species listed on CITES Appendix I or IUCN Critically Endangered list. Products shall only contain species listed on CITES Appendix II &amp; III or IUCN endangered and vulnerable list if the following is covered:</p> <ul style="list-style-type: none"> <li>- Product is accompanied by applicable CITES licenses and sourced as FSC® certified or equivalent.</li> <li>- Verify timber as recycled material, if declared as such by our supplier.</li> </ul>

<p><b>Certified sustainable sources</b></p>	<p>We are committed to sourcing our timber products as FSC® certified or equivalent. Suppliers must be able to demonstrate that the timber source comes one of our identified certification schemes with an intact Chain of Custody.</p> <p>To categorise timber products as Certified sustainable, The Very Group will verify that the following requirements are met:</p> <ul style="list-style-type: none"><li>- Product carries a valid FSC® or equivalent certification claims and code on the contract.</li><li>- In addition, a random sample of certified products shall be internally selected for full UKTR /EUTR due diligence risk assessment to ensure the integrity of the certification claims.</li></ul>
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## 6. Appendices

### Appendix 1

**Product Scope** List of timber products that are required to be compliant with EUTR process, provided by UK Office of Product Safety Standards (OPSS):

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/951506/Guide-to-uk-timber-regulations-2013.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951506/Guide-to-uk-timber-regulations-2013.pdf)

**CITES** (Convention on International Trade in Endangered Species of Wild Fauna and Flora) is an international agreement which governs the trade in species threatened with extinction. You can visit their website at <https://www.cites.org/> for further details.

The CITES list can be searched on this website: <https://speciesplus.net/>

EU Timber Regulation Guidance can be found at <https://www.gov.uk/guidance/eu-timber-regulation-guidance-for-business-and-industry>

CPI – Corruption Perception Index: <https://www.transparency.org/en/cpi/2023>

Illegal Logging and Associated Trade Risk Scores and Categories (ILAT Risk Level):

<https://www.forest-trends.org/wp-content/uploads/2022/03/2022-Risk-Scores-IDAT.xlsx>

**EU Timber Regulation** Commission Guidance can be found at

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/508342/EUTR\\_Commission\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508342/EUTR_Commission_guidance.pdf)

**UK FLEGT** Aims to reduce illegal logging by strengthening the sustainability and legality of forest management, improving forest governance and promoting trade in legally produced timber. The FLEGT Regulation, adopted by the EU in 2005 and retained and amended under UK law in 2018, empowers the UK to negotiate Voluntary Partnership Agreements (VPA) with timber-exporting countries.

VPAs include commitments and actions from both parties to halt trade in illegal timber. Producer countries issue FLEGT licences that certify the legality of timber exported to the UK. To issue FLEGT licences, a VPA partner country must implement a timber legality assurance system (TLAS) and other measures specified in the VPA.

Guidance can be found on this website:

<https://www.gov.uk/government/publications/timber-regulations-reports/flegt-report-2022-to-2023>