



Timber – Chain of Custody Policy (Sustainable timber procurement) GENERAL STATEMENT

Fireclad Ltd. and Harrison Jorge Ltd. ('the company'), in line with our ISO 14001 and Sustainability policies, has developed the following chain of custody policy in relation to timber raw material sustainability and the requirements of the FSC (Forest Stewardship Council UK) Chain of Custody certification scheme.

This policy sets out, clarifies and publicises our policy and action plan for recognising the need for compliance with international, national and industry recognised best practice in the control and encouragement of continuing and improving renewability of those raw timber resources required for the manufacture of the timber products that we use and install as a necessary aspect of our services.

As a general statement of principle, our Company will never knowingly purchase timber based products manufactured from timber that is at a high low risk of being:

- Illegally Logged
- Harvested from areas where there is violation of traditional or civil rights
- Harvested from forests in which high conservation values are threatened by management activities
- Harvested from areas being converted from forests and other wooded ecosystems to plantations or no forest uses
- Harvested from forests in which genetically modified (GM) trees are planted

Our policy is currently split into two parts:

Part one:

It is our company's policy to recognise and to comply with the relevant parts of the FSC UK Chain of Custody Certification scheme or with our customers' preferred chain of custody or equivalent scheme, if different to the FSC UK scheme. Our level of involvement and associated compliance with each such scheme will therefore ultimately be as necessary or required by our Customers. We will therefore develop and implement systems, procedures, documents and records insofar as necessary by this policy, to provide the appropriate level of verifiable compliance as required by specified scheme.

We recognise that the FSC UK Chain of Custody scheme requires, if certification of the chain of custody is required, the involvement of a certification body to conduct audits to verify compliance with the scheme requirements. Our business is classified as 'small' under accepted UK categorisation and as such, the quantities of timber products used in combination with the lean margins imposed by our **customer contacts** would not generate the income necessary to support our own company's certification under any Chain of Custody scheme. We would, however, be able to provide confirmation that

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relevant products provided by the relevant suppliers were appropriately certified or covered by an appropriate supplier certification at the point that we purchased them.

We also recognise that project-specific Chain of Custody certification is available through the FSC if required and where so, we would participate in such a scheme subject to contractual requirements.

It is also important to understand that sometimes, there are exceptions to Chain of Custody requirements, one of which in particular is likely to apply to our own business and projects, as follows (extracted from the FSC fact sheet entitled 'Chain of Custody Certification' currently available on the FSC web site as at June 2011):

“Companies who are doing work for an FSC certified company under that company's Outsourcing Policy and who do not take ownership of the products”

Part two:

Irrespective of our customers' requirements, which in some cases will mean that no particular chain of custody scheme compliance is required, we will in any event, implement our own best practice approach to timber chain of custody, so far as it is practicable to the size and nature of our business and its management resources and its suppliers. This approach will be split, temporarily, into two streams, as follows;

Stream 1:

As a first choice, we will always select FSC endorsed timber products, these normally only being currently offered by national, reputable 'brand name' timber wholesale / retail suppliers that may or may not be based locally to our work and thus our customer locations, unless the specific product required is simply not available in FSC endorsed form, from any known and reasonably local UK supplier or supplier branch.

Stream 2:

As a second choice, i.e. where FSC endorsed products of the type required are simply not available from any known and reasonably local UK supplier, we will source equivalent non-FSC endorsed products offered by reputable timber wholesale / retail suppliers that are where reasonably practicable, based locally to our work and thus our customer locations. We will, however, obtain from such suppliers, as much documentary verification as can reasonably be supplied, as to the product's raw timber source in terms of country of origin, region of origin, manufacturing company's name and address and any certifications or accreditations available as to the sustainability of the particular type of timber used.

We recognise that our customers generally prefer our suppliers to be local to the work sites so as to generate as much local business and thus employment as is reasonably practicable. As a business with a vested interest in our own local community, we too, recognise the need for placing purchases locally whenever we can. We are therefore engaged in a programme of communication of our environmental policies and aims to

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our suppliers and subcontractors and we are working with them to encourage and increase the ratio of sustainably produced timber products offered and purchased over the use of the equivalent products offered whose sustainability chain is not yet 100% verifiable through existing, recognised schemes.

We have set a (reviewable) target that is currently to cease the purchase of all timber based products that are not accompanied by verifiable FSC (or customer / industry-recognised equivalent scheme) endorsement, by the end of 2012. This timescale is designed to allow for the completion of our communication and co-operation programme with our suppliers, so that by that target date, all timber based products required by our business and by our customers through our company, can and will be purchased as having been FSC certified / endorsed or certificated by another industry and customer-acceptable scheme.

Signed:

Marc Skinner, Director

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