

CORPORATE

PRIMARK WOOD AND WOOD-DERIVED FIBRE POLICY¹

Legal, responsible sourcing and sustainability requirements

All products sold in Primark stores, including its associated labels and packaging must always be safe, legal, and acceptable in all countries in which the product will be marketed and sold. Supplied product must fully comply with all current and relevant UK, European and US legislation and regulations, whilst meeting the quality standards in Primark's QA manuals.

Additionally, we are committed to reducing our business impact on the environment and seek to promote environmentally sustainable practices to continuously improve our environmental management where possible². This includes the reduction and reuse of materials as a priority for the protection of the world's limited forest resources. Any procurement of virgin wood-derived materials should be responsibly sourced to promote responsible forest management.

Purpose of this policy

Primark is dedicated to support approaches and systems to protect the world's Ancient and Endangered Forests, by:

1. applying circular design principles³,
2. procuring responsibly and,
3. prioritizing Next Generation Solutions⁴.

Primark will work with Canopy⁵ to support conservation solutions and Next Generation Solutions, supporting CanopyStyle⁶ and Pack4Good⁷ initiatives.

We are committed to assessing our use of man-made cellulosic fibres (MMCF) by 2022 and for packaging, paper, and solid wood by 2023, with a view to eliminate sourcing from endangered species habitat and Ancient and Endangered Forests.

Scope of this policy

This Wood and Wood-derived Fibre Policy applies to all Primark branded products, product packaging (primary⁸ and secondary⁹) and transit packaging (tertiary¹⁰).

Virgin and recycled¹¹ materials which derive from wood or wood substitutes and are within scope of this policy, which includes solid wood, composite wood¹², wood pulp, paper (including tissue paper, labels, swing tickets), cardboard (including corrugated cartons, inserts, dividers and partitions, hangers, product packaging), wooden pallets and fibres

¹ Previous versions of this policy were known as the Solid Wood and Wood-derived Fibre Policy. The name of this policy has been changed to reflect the new scope of this policy.

² Our Environmental commitment is stated in our Environmental Policy <https://primark.a.bigcontent.io/v1/static/Environmental-Policy>

³ Maximising resources and minimising waste by reducing, reusing and recycling resources.

⁴ Canopy's definition of Next Generation Solutions <https://canopyplanet.org/solutions/next-generation-solutions/>

⁵ Canopy is a not-for-profit organisation, working with the forest industry's biggest customers and their suppliers to develop business solutions that protect ancient and endangered forests. <https://canopyplanet.org/about-us/>

⁶ CanopyStyle initiative <https://canopyplanet.org/campaigns/canopystyle/>

⁷ Pack4Good initiative <https://canopyplanet.org/campaigns/pack4good/>

⁸ Packaging which protects and preserves the product and informs the end-user. Examples include display boxes, blister packs, glass jars etc

⁹ Packaging is used for protection and collation during storage, transport, and distribution. Examples include countertop display unit and shelf-ready packaging.

¹⁰ Outer packaging used to group larger quantities of SKUs to transport them for shipment and distribution. Examples include shipper cartons and pallets

¹¹ We must know the percentage of pre-consumer and postconsumer recycled material (to be declared in the Wood Declaration). We will give preference to those recycled products with a higher percentage of post-consumer content providing this will not affect the quality or safety of the product. Please note we treat pre-consumer recycled material as virgin material for the purposes of this policy so must meet all the set requirements.

¹² Includes hardwood plywood, medium-density fibreboard (MDF) including thin MDF, particle board, component parts and finished goods fabricated using composite wood products.

made from wood pulp (man-made cellulosic fibres including viscose (rayon), lyocell, modal, cupro, acetate and trademarked MMCF).

Our ambition

To support approaches and systems to protect the world's Ancient and Endangered Forests, we will collaborate with Canopy to work with innovative companies and suppliers to encourage the development of materials which reduce environmental and social impacts, with a focus on recycled materials and agricultural residues;

Wood-derived fibres (MMCF): shift to more environmentally and socially beneficial options

- We will participate in trials where appropriate, where there is fibre producer innovation.
- Primark will put in place a preference for purchasing man-made cellulosic fibre products made from innovative fibre sources and develop a 2030 procurement target.

Packaging and paper: reduce the use of virgin resources

- Review all our paper and packaging use annually, identifying areas where we can increase paper use efficiencies, reduce paper and packaging basis weights, to save resources.
- Continue carton optimisation programme, working with our product suppliers to minimise empty space in shipping cartons and reduce paper usage
- Review usage of 5-ply corrugated cartons and move to 3-ply where possible.
- Source, design and implement shipping, display and wrapping systems that minimize the use of virgin paper.
- Give preference to paper/packaging with high-recycled content, specifically post-consumer waste content, assessing performance of the end use so that it is not compromised.
- Research innovations supported by EcoPaper Database and The Paper Steps as a guide.
- Recycle transit packaging at the end of its use.

Our requirements

We require all suppliers to comply with this policy. To meet legal, responsible sourcing and sustainability requirements, supplier are required to meet the following;

1. **Legal compliance** requirements by destination country of origin and product category
2. **Sustainability and responsible sourcing** requirements by product category

1 Legal Compliance	Product category		
	Solid wood products	Wood fibre products	Packaging (primary, secondary, tertiary)
For products shipped to the UK and EU, products <u>must</u>...	Meet the legal compliance requirements of the; a) UK Timber Regulation (UKTR) ¹³ b) EU Timber Regulation EU/995/2010 (EUTR) ¹⁴¹⁵		
Additionally, if you supply products destined for the US, products <u>must</u>...	Meet the legal compliance requirements of the; c) US Lacey Act Amendment (16 U.S.C 3372) ¹⁶ d) US Toxic Substances Control Act (TSCA) ¹⁷ requirements ¹⁸ , for composite wood		

¹³ UKTR <https://www.gov.uk/guidance/regulations-timber-and-flegt-licences>

¹⁴ EUTR https://ec.europa.eu/environment/forests/timber_regulation.htm

¹⁵ The scope of the EUTR regulation includes solid wood products, flooring, plywood, pulp and paper. Not included are recycled products, as well as printed papers such as books, magazines and newspapers, packaging used to support, protect or carry another product, furniture, bamboo and rattan. https://ec.europa.eu/environment/forests/timber_regulation.htm

¹⁶ US Lacey Act <https://www.cbp.gov/trade/entry-summary/public-laws-impacting-trade/public-law-110-246/amended-lacey-act/guidance-lacey-act>

¹⁷ US TSCA <https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act>

¹⁸ All composite wood manufactured in or imported into the United States after March 22, 2019 must be TSCA Title VI compliant and labelled as such.

2 Sustainability & Responsible Sourcing	Product category		
	Solid wood products	Wood fibre products	Packaging (primary, secondary, tertiary)
Materials must not...	a) Derive from unknown sources, or timber that has been illegally harvested or traded. ¹⁹ b) Originate from wood harvested: <ul style="list-style-type: none"> - from Ancient or Endangered Forests such as the Canadian and Russian Boreal Forests; Coastal Temperate Rainforests; tropical forests and peatlands of Indonesia, the Amazon, and West Africa - from endangered species habitat. - in violation of traditional and civil rights; - in contravention of First Nations/tribal/indigenous peoples' and community rights; - in forests where high conservation values are threatened; - in forests which have converted to plantations or non-forest use post-1994; - from forests that contain species that have been genetically modified. 		
Materials should...	c) Be certified by a recognised forest management certification scheme ²⁰ , preferably FSC ²¹ (Forest Stewardship Council), if virgin materials are being used.		
		d) Be purchased from fibre producers with a Canopy green shirt Hot Button ranking ²² rating, if using man-made cellulosic fibres.	
We encourage...		e) Exploration and assessment of fibres ²³ , paper ²⁴ and card made from agricultural residues or post-consumer waste recycled content.	

¹⁹ The Global Forest Risk Registry (<http://www.globalforestregistry.org>), the Transparency International Corruption Perception Index (<https://www.transparency.org/en/cpi>) and Canopy's ForestMapper (<https://canopyplanet.org/tools/forestmapper/>) can be used to identify potentially high risk countries and regions for wood sourcing. Primark will expect you to immediately start working towards verified or certified sources of wood from other providers.

²⁰FSC is preferred. PEFC (Programme for the Endorsement of Forest Certification) is accepted in regions where FSC certification is not available. <https://www.pefc.co.uk/>

²¹ FSC <https://info.fsc.org/certificate.php>

²² Canopy Hot Button Ranking <https://hotbutton.canopyplanet.org/>

²³ Canopy Next Generation Solution Providers <https://canopyplanet.org/solutions/next-generation-solutions/next-generation-solutions-providers/>

²⁴ Paper Steps: <https://canopyplanet.org/resources/the-paper-steps/>

Documentation required from Suppliers

Suppliers of wood and wood-derived fibre products should provide evidence of compliance to this policy (legal, responsible sourcing and sustainability requirements) by submitting the following documentation prior to product shipment.

Packaging suppliers will be required to supply information about their materials on request.

Solid wood and wood-derived fibre products process	
<p>1</p>	<p>For every product shipment, please complete applicable sections of the Wood Declaration.</p> <p>You can screen wood-derived products using the following Canopy tools, to complete the declaration;</p> <ul style="list-style-type: none"> • ForestMapper https://canopyplanet.org/tools/forestmapper/ • Hot Button Green Shirt rating https://hotbutton.canopyplanet.org/ (for wood-derived fibres)
<p>2</p>	<p>Upload the completed Wood Declaration on to the Primark Supplier Testing Portal (Datalink)</p> <p>Suppliers should use the supplementary attachment function to upload supplier declarations to the portal. This action can be completed in the following two ways:</p> <ul style="list-style-type: none"> • At the time of completing the online test request form. • After completing the TRF. Once submitted to the lab, any additional or missing supplementary documents can be added through the Report Detail Page from the report search when it is in Progress, On-Hold or Off-Hold status. <div data-bbox="523 994 1134 1659" data-label="Image"> <p>The screenshot shows a web interface with a table. The table has columns: Report Detail Page, Report Attachment, GCC/CPC, Supplementary Attachment (highlighted with a yellow box), and Test Request Submission Date. Below the table is a dropdown menu with the following options: REACH DOC (suppliers of chemical mixtures & packaging not in the EU), REACH DOC (suppliers of chemical mixtures & packaging in the EU), REACH DOC (suppliers of articles & packaging), REACH DOC (suppliers of hangers), SVHC BOS (Articles), SHVC BOS (Mixtures), BOM (Item's in contact with food), EU Timber Regulation DOC, Lacey Act DOC, MSDS (Material Safety Data Sheets), Claims Support, CLP Certificate, Cruelty Free Information, Finished Product OEKO-TEK Declaration, Fitting Report, GRS Certification, GRS Transactional Certificate, Other Attachment, PCC/ CPC.</p> </div> <p>Any change in the sources of wood or wood-derived fibre used in your products will need to be notified to Primark via the testing portal with an updated declaration.</p>
<p>3</p>	<p>Forest management certificates²⁵ for solid wood and wood-derived fibre products should be sent to the Buying teams to be validated by the Product sustainability team prior shipment. Certificates should be sent clearly detailing the products being covered by the certification.</p>

²⁵ FSC is preferred. PEFC (Programme for the Endorsement of Forest Certification) is accepted in regions where FSC certification is not available.