

Office DEPOT.

Office Depot Europe – Wood Fibre Procurement Policy

It is important to us that our purchasing power of paper and other wood fibre products increases the volume and promotes the use of raw materials from responsibly managed forests and recycled sources.

Our objective is to work with suppliers that enable greater transparency of our supply chains, by providing the clarity and evidence required about the product raw materials, manufacture and life cycle to ensure that our principles and policies are met.

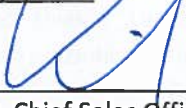





To achieve this, we participate in the World Wildlife Fund's Global Forest & Trade Network programme (WWF GFTN-UK)¹ where we have adopted their stepwise approach towards responsible purchasing and forestry practices as the core of our policy. Page two of this policy outlines the evidence we will require from our suppliers that will enable greater transparency of our supply chains to ensure that our principles and policies are met. This means, as a European organisation we are committed to:

- buying only from verified legal and known sources,
- excluding timber sourced from uncertified high conservation value forests,
- aiming for products and raw materials that are recycled and/or certified to international forest management standards that include ecological, social and economic criteria, like those established by the Forest Stewardship Council (FSC),
- meeting the due diligence obligations in respect to the EU Timber Regulation (EU Regulation 955/2010),
- eliminating any products/ components that do not comply with our policy,
- promoting credible certification within our supply chain, and
- publicly reporting our annual progress against our WWF GFTN-UK scope

The scope of this policy includes:

- Office Depot branded products (including Niceday, Viking and Foray brands) that contain wood or wood fibre, such as paper, pads, files, envelopes, labels and furniture
- OEM copier papers
- Products that contain wood or wood fibre where we or our vendors are classified as the 'operator' under the EU Timber Regulation - Regulation (EU) No 995/2010

Executive Signatures

 Oliver Klinck, Chief Sales Officer Direct, Chief Merchandising Officer	 Date
 Patrick Dittl, Chief Operating Officer	 Date
 André Kaiser, Snr Director Procurement Europe	 Date

¹ WWF GFTN-UK, Office Depot UK Ltd and Office Depot International (UK) Ltd are participants in the UK Global Forest & Trade Network

Supplier Guidance on Information Required

For all wood fibre products:

- The % of wood fibre in the item. This can be estimated by dividing the combined weight of all wood/fibre components by the total weight of the product.
- Whether the product is imported into the EU, so we can establish whether the EU TR is applicable.
- Identify the wood/fibre components and the weight of each. If the product contains more than one wood/fibre component we need to know information about each of them. For example, a notepad's cover, backing board and interior sheets of paper.
- The materials used and their suppliers. We need to know the type of materials used (e.g. paper, board, plywood, MDF etc.), the trade name of the material, the name of the supplier and their business type (e.g. merchant, mill, agent etc.). If more than one supplier is used for a material, we need to know the details for each one.
- A recent delivery note or invoice from each material supplier to your production site as supporting evidence. Sensitive information such as prices may be redacted.
- A declaration of the wood/fibre countries of origin (i.e. where the forests are) and tree species (or recycled fibre) used to make each material. Where there are multiple or variable sources an aggregated list is acceptable, as long as it includes all potential countries and species used in the previous 12 months.

Additional evidence for certified products (such as FSC, PEFC, Blue Angel, EU Ecolabel):

- For FSC and PEFC products, delivery notes, packing lists or invoices from the certified vendor to Office Depot, to ensure the correct claims have been made.
- For Blue Angel, EU Ecolabel etc. products, certificates or licences confirming that the product falls within the scope of the relevant scheme.

Additional evidence for non-certified wood fibre products:

- In the absence of certification, we need further evidence to prove that the raw materials are from legal origins. This is especially important where the product or raw materials are imported into the EU and are in-scope of the EU Timber Regulation.
- A complete overview of all the stages in the wood fibre supply chain, from the finished product back to either certified/recycled materials or the forest of origin. A diagram or supply chain map can be useful to illustrate this.
- Supplier delivery notes or invoices for each material used, for every link in the supply chain. Sensitive information such as prices may be redacted.
- Production records, for every link in the supply chain, but typically in assembly of the finished product, as evidence of the raw materials being used to make the product. Photographic evidence of the material being used in production may also be acceptable.
- Where traceability back to the forest of origin is necessary (i.e. the use of certified or recycled materials cannot be proven) more detailed evidence of legality will be required, such as:
 - 'Right to Harvest' documentation (felling permits, harvest rights, land deeds etc.) to demonstrate the wood is from a legal origin.
 - Relevant documents to demonstrate royalty payments/taxes have been paid.
 - Relevant transportation documents to demonstrate custom tariffs have been paid.
- If you are the 'operator' under the EU Timber Regulation, evidence of your due diligence system and the procedures you use to gather and assess the information provided by your suppliers.
- Further information about the type and origin of recycled material including documents confirming raw material sources especially if a recycled pulp has been used in a paper based product.