

Modern Slavery and Human Trafficking Statement

Euroforest Ltd (and all of its operating divisions and subsidiary companies) (together the “Euroforest Group”) are committed to taking appropriate and proportionate steps to ensuring acts of modern day slavery and human trafficking do not exist within its business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 29th December 2018.

This statement has been approved by the Board of Directors. Information contained in this statement is correct to the date of publish.

Company Overview

Euroforest Limited provide harvesting and marketing services to the UK forest industry. The company harvest in excess of 2.1 million cubic metres of timber every year. The harvesting service covers both standing trees and roadside purchases encompassing line and selective thinning, through to clear felling at the end of rotation.

Euroforest supplies the entire UK market, from small-scale millers through to the largest processing operations, as well as a number of Scandinavian pulping operations and biomass renewable energy plants.

The Group as at 29th December 2018 comprised the following four subsidiaries:

Sheffield & Company Limited

This company undertakes some harvesting and marketing in Northern England and South West Scotland and specialises in timber haulage.

Pryor & Rickett Silviculture Ltd

Pryor & Rickett Silviculture is dedicated to working closely with clients and their teams to manage woodlands of all sizes and forest types.

Euroforest Timber Ireland Limited

This is a comparative business providing harvesting and marketing services to the forest industry in Ireland.

Baltfor Trading OÜ

This is a hardwood timber harvesting and marketing business in Estonia.

Our supply chains are made up of a large number of third party providers many of which are small and medium sized enterprises (SMEs). The two main services provided to the core business are timber harvesting and haulage in addition to normal business operations such as computer infrastructure and office costs.

Policies

Euroforest Group is committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business.

The Group is committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

All internal policies are reviewed regularly to ensure they are appropriate, well communicated and promote continued compliance with the Act and other applicable legislation.

Business Ethics Policy. This policy is designed to ensure that Euroforest Group conducts all business responsibly and with the highest ethical and professional standards. This policy sets out the enduring principles which underpin the groups approach to conducting business to the highest ethical standards. The Group demonstrates a clear approach to business integrity and ethics, which underlies Group values.

Whistleblowing Policy. Euroforest Group encourage all employees to report any concerns related to the activities of the business, including any worries in relation to slavery and human trafficking. The Group's whistleblowing policy and procedure is designed to ensure that any matter raised under this procedure will be investigated thoroughly, promptly and confidentially.

Equality Opportunities Policy. Euroforest Group is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination, harassment and victimisation on the grounds of race, sex, pregnancy, maternity, martial or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

Ethics Policy. Recruitment Policy. Euroforest Group ensures that the process of recruiting employees is fair, consistent, professional and non-discriminatory to both internal and external candidates.

Assessment of our supply chain

Overall, Euroforest Group considers its supply chain to be at a 'medium risk' in relation to modern slavery and human trafficking. We appreciate that the overseas subsidiary increases risk levels as utilisation of overseas or unskilled labour have been identified as posing higher risk levels.

The core business in the UK and Ireland are at a low risk level as Imports are a relatively small proportion of the trading activity. Unskilled labour is of a small quantity and operations are UK based meaning suppliers are already under an obligation to comply with UK law on forced labour.

Euroforest Group demonstrates a zero tolerance to slavery and human trafficking and work to ensure that all those within the Group's supply chain and contractors comply with our values and ethics.

Euroforest Group will update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or own business.

Effectiveness in combating slavery and human trafficking

Any suspected incidence of slavery or human trafficking would be immediately reported to the Executive Board in the first instance. It would then be dealt with appropriately, which may include, but is not limited to, terminating commercial relationships, disciplinary action and notifying the relevant authorities.

Our commitment

The Group has reviewed its key performance indicators (KPI's) in light of the introduction of the Act.

As part of our on-going commitment to ensuring modern slavery is not present within the Group, we will look to take the following action in 2019/2020:

Develop a training session to be completed by all managers and HR professionals. Delivery of this is on a rolling on-going basis, with network of managers around the country to then roll out and brief their teams to ensure that all necessary personnel are appropriately briefed.

Undertake a review of the standard supplier Terms & Conditions across the Group to ensure inclusion of contractual modern slavery obligations, thereby placing an increased emphasis on compliance amongst our suppliers.

Continue to raise awareness amongst all employees of modern slavery issues through training. For example, by rolling training out to more employees and looking to develop a fact sheet to be sent to all employees on identifying and reporting issues.

Any enquiries regarding this statement should be addressed to jim.tollitt@euroforest.co.uk

Euroforest Limited

21 March 2019