

Document Control
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FSC® Chain of Custody (Transfer System) Management System



Approved For Use By: Chris Jones (MD)

Document Authority: Warren Sellers (Business Standards Manager)

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Issue	Change Detail	Date
1	New policy in-force	Aug 2019
2	Amendments	Oct 2019
3	Review and updates	Sept 2020
4	Reviewed	Sept 2021
5	Revised for labour rules	Mar 2022
6	Version Change	Oct 2022
7	Change in Leadership	Jan 2023
8	Reviewed	Jan 2024

1 AIM

The aim of this procedure is to ensure that the purchasing and sales of products containing timber are where possible from FSC chain of custody certified suppliers.

2 Scope

All activities undertaken by Posturite during the management of an FSC transfer system.

3 Departments, Staff and Other Interested Parties Affected

Purchasing, Warehousing, Sales, Finance Departments.
Customers, Suppliers of Products, Logistic Companies and Certification Body.

4 Responsibilities

Head of Sales – Geoff Thompson – overall leadership
Sales – Geoff Thompson
Sales Staff – Specifying correct product to client.
Chain of Custody Management Representative – Warren Sellers
Purchasing Manager – Chris Pratt
Purchasing department staff – Product Knowledge and record keeping
Purchasing /Warehouse Manager – Stock management & segregation of stock
Warehouse staff – Picking and system knowledge, product knowledge.
Customer Services – Jamie Hall, CS Staff - orders

5 Associated Documents

We shall maintain the following documentation and associated records as applicable to our scope of certification.

Procedures, product lists; training records; purchase and sales documents; material accounting records; annual volume summaries; trademark approvals; records of suppliers, complaints and control of nonconforming products.

FSC Documentation and associated records shall be retained for a minimum of 5 years.

6 Procedures

6.1 FSC Trademark Use (logo)

The FSC trademarks are:

PROTECT

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- **The FSC logo**
- **The name Forest Stewardship Council**
- **The abbreviation FSC**
- **Forests for All Forever brand**

The following procedures cover all four trademarks.

We understand that the FSC trademarks are used on product labels and may be used also for promotion of certified materials in Posturite Ltd. The person responsible for use of FSC trademarks is the Head of Marketing.

Before using any FSC trademark, we will prepare a project in accordance to standard FSC-STD-50-001 and we will submit the design of the trademark use to the Certification Body for approval. This also applies to materials (such as a press release, website) that do not include the FSC logo, but only the name FSC or Forest Stewardship Council.

Posturite Ltd shall reproduce the FSC on-product and off-product labels using our unique trademark license code in the space specified in the graphic design of the FSC labels.

FSC labels shall not be used on-product together with the logos, names or other identifying marks of other forest management conformity assessment schemes.

For on-product labelling, the responsible person shall ensure that the FSC label is clearly visible on the product.

On-product labelling applies only to material which is purchased with one of the following claims included on the invoice and delivery notes:

FSC claims for the outputs	FSC label
FSC 100%	FSC 100%
FSC Mix percentage of at least 70%	FSC Mix

For each labelled product, we select the FSC label that corresponds to the input material.

All trademark approvals shall be retained for minimum 5 years.

Our Certification Body is B M Trada and logo approval shall be managed through them.

6.2 Purchasing Requirements

All products that we claim to be from FSC certified sources shall be purchased under strict control.

These controls shall include the ongoing assessment of suppliers to ensure the products we purchase are certified.

When making purchases we shall stipulate our FSC requirements on the purchasing documentation (Purchase Order).

Records of FSC purchases shall be maintained and periodic audits will be carried out to ensure stock levels are correct. If discrepancies are found an investigation shall be carried out to track the stock.

We shall maintain up to date information about our suppliers including proof of their certification status, the products which they supply and the specific FSC claim for each product (FSC 100%, FSC Mix or FSC Recycled).

6.2.1 Volume Control

The Head of Procurement assumes overall responsibility for volume control and for producing a correct annual volume summary and other aspects of the process as described below.

Responsibilities include the following:

Recording of received volumes, based on delivery documentation. These are recorded for each of the specified products. Ensuring that the details are accordance with the requirements stated on the purchase order. These volumes are recorded on the FSC Goods In/Goods Out Report

Ensuring that the sale of each product is deducted from the current volume to maintain an accurate stock control.

Ensuring that periodic (quarterly) checks are undertaken to verify stock levels.

Preparing an annual volume summary relating to the past 12 months, where the volumes are summarised for each calendar year and shown for each supplier and customer.

6.2.2 Supplier Approval and Evaluation

It is important that we carry out a full assessment of our suppliers with regard to products that contain timber to ensure that these fulfil the requirements of the FSC Chain of Custody standard (FSC-STD-40-004 V3-1).

Suppliers shall be approved prior to ordering products which claim to be from a certified FSC source and in order to be considered for approval suppliers shall be required to prove they have achieved this status through certification. Checks will also be undertaken via the FSC Certificate Database to ensure ongoing certification. Records of these activities shall be maintained.

6.3 Goods Received - Storage and Segregation

Upon receipt of FSC certified products our warehouse staff shall initially quarantine these items until there is an opportunity to;

1. Check the supplier's delivery documentation to confirm that the product and quantities are in accordance with what has been purchased and received,
2. Confirm that the FSC claim is specified and the validity of the FSC Certificate Number is checked. These shall be carried out against the FSC Database. Discrepancies shall be communicated to procurement.
3. Once the above checks have been undertaken, we shall store our FSC products in identifiable areas away from similar products which do not hold FSC certification.

6.4 Compliance with Timber Legality Legislation

We shall ensure that our FSC certified products conform to all applicable timber legality legislation.

Applicable underpinning legislation includes the Timber and Timber Products (Placing on the Market) Regulations 2013 and the Forest Law Enforcement, Governance and Trade Regulations 2012 (as amended).

In order to comply we shall ensure that our suppliers are FSC certified with periodic checks on the validity of their certification via the FSC Database. Records of these checks shall be maintained.

There may be a need to validate information relating to species and country of harvest which we will do by tracing the upstream supply chain. Should we receive a request for such information then records shall be maintained where validity claims have been verified.

We shall also support transaction verification conducted by BM Trada and Accreditation Services International (ASI), by providing samples of FSC transaction data as requested by BM Trada.

We shall also support clause 1.10 of the FSC standard, regarding fibre testing conducted by B M Trada and or ASI.

6.5 Sales

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We shall ensure that all sales documentation issued for products sold with an FSC claim shall include the following information;

1. Posturite company name and contact details,
2. Information to identify the customer – Name and Address,
3. Date when the documentation was issued,
4. Product name or description,
5. Quantities,
6. Our FSC certificate code,
7. Product claim – We pass on our suppliers output claim. A clear indication of the FSC claim for each product (i.e. FSC mix 70%, FSC 100%).
8. Product group Office furniture, W12 & W12.7 - Outputs - FSC MIX 70%, FSC 100%.

It is important that the volume of all FSC product sales are compiled and adjustments made against the current warehouse stock levels in order maintain correct volume control.

6.6 Customer Services

Customer services shall be responsible for the processing of client orders, so it is important that staff are fully aware of those products which are being sold with an FSC claim.

A full understanding of the FSC Returns mechanism shall be required. This will follow current processes but with the added importance of stock segregation and communications with the warehouse.

6.7 Product Picking and Delivery (Sales)

Care shall be taken when picking items for delivery when part or all of the order is for FSC certified products.

Products can only be dispatched from the stated storage area and once all checks have been undertaken in accordance with the goods received stage above.

6.8 Nonconforming Products

We shall ensure that all products which do not meet our, customer or FSC standard requirements are identified and quarantined from other stock.

Upon receipt of goods we shall inspect to ensure that our requirements have been met in terms of quality and FSC compliance.

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Nonconforming products shall be labelled to prevent their unintended use and arrangements made to return the goods to the supplier.

Records of all defects and returned goods shall be maintained in order to facilitate ongoing evaluation of nonconforming suppliers. This information shall feed into our periodic supplier evaluation process.

Where nonconforming products are detected after delivery to our customer's we shall undertake the following;

1. Notify our certification body and the affected customers within 5 working days of the identification of the nonconformity,
2. Notify the supplier of the identified issue,
3. Analyse the cause of the nonconformity and implement measures to prevent their recurrence. The supplier will be part of this process.
4. Cooperate with the certification body in order to allow them to confirm that appropriate actions have been taken to correct the nonconformity. This may include the sharing of information such as specific transaction data.

Records relating to the above procedure will be maintained and analysed periodically to ensure compliance with the requirements of the standard.

6.9 Complaints

All complaints received relating to the purchase and supply of FSC certified products shall be reviewed immediately by our system Management Representative and the appropriate department head.

Depending on the initial findings the issue may be escalated to the board of directors.

1. We will ensure that we acknowledge receipt of the complaint with the complainant within 2 weeks of receipt.
2. We shall fully investigate the complaint in order to identify proposed actions and respond to the complainant within 3 months. If more time is required, we shall inform the complainant and our certification body of this.
3. Following the internal investigation and communications with the complainant we shall determine corrective actions and implement these. We shall ensure that any issues with our processes are corrected to meet certification requirements.
4. We shall at all times keep an open dialogue with the complainant and where necessary our certification body through to an agreed conclusion and closure.

Records of all complaints shall be maintained and will be subject to periodic review.

7 Staff Training

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All staff who perform elements of the procedures stated within this document shall undergo specific internal training and be aware of the consequences of not meeting the requirements stated within this management system and those associated with the FSC standard.

Records of specific training shall be maintained and where necessary periodic refresher training shall be undertaken and documented accordingly.

8 Core Labour requirements

As a UK employer we are bound by UK employment law and have robust policies, processes and procedures in place and comply these requirements.

We have established and implemented applicable policies to support these requirements including:

Modern Day Slavery,
Equality & Diversity,
Equal Opportunities,
Anti-Harassment & Bullying Policy,
Corporate Social Responsibility.

We will not employ child or forced labour.

We are an equal opportunities employer, and this is managed in accordance with our policy.

Procedures are in place for the recruitment of staff and the checking of a person's eligibility and rights to work.

We do not employ staff under the age of 18 unless they are on an applicable apprenticeship scheme.

Staff receive a copy of our Employees Handbook which contains information about our procedures and policies on a range of matters which may affect them in the workplace.

Staff are free to join applicable trade unions with no restriction or prejudices.

Our HR department carries out the recruitment process and ensures compliance to the above requirements.

The Business Standards Manager is the authority of this document and is responsible for ensuring that this document is reviewed in line with the review requirements of the organisation control and management systems.

This procedure was approved by the MD on the date shown and is issued on a version-controlled basis under their signature