

APP China

Timber and pulp assessment

Total score:

31.4%

Latest update: July 2020

Next scheduled: July 2021

About this company:

Headquartered in Singapore, APP China Group is the sister company of [Asia Pulp and Paper \(APP\) Group](#). Established in 1992, the company operates plantations in China and is involved in pulpwood production, pulp and paper production, trading and distribution. The company has also invested in several large pulp and paper companies in China. Sinar Mas is the company's parent entity.

Parent company: Sinar Mas Group

Landbank: 288,208 hectares

Thomson Reuters ticker: Private company

Bloomberg ticker: Private company

Activities: Pulpwood production; Pulp and paper production; Trading and distribution

Locations: China (Hainan, Guangdong, Guangxi, Yunnan, Jiangxi, Henan, Liaoning, Sichuan, Hubei, Fujian, Shandong, Jiangsu, Zhejiang provinces)

Headquarters: Singapore

Related companies: Sister company of Asia Pulp and Paper and Golden Agri Resources.

Parent website: <http://www.sinarmas.com/en/>

Website: <http://www.app.com.cn>
[Latest annual report](#) | [Sustainability report \(2018\)](#)

Total:

52.12 / 166

31.4%



> Sustainability policy and leadership

4.5 / 12 37.5%

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■ 1. Sustainable forestry policy or commitment for all its operations?

The company states in its sustainability report that it has a Forest Protection Policy, Sustainable Management Policies, Social and Labor Policies and Environmental Policies. However, these policies could not be identified on the company's website.

✘ 0 / 1 [Source](#)

■ 2. Sustainable forestry policy or commitment applies to all suppliers?

✘ 0 / 1

■ 3. High-level position of responsibility for sustainability?

The company as per its Sustainability Report 2017, has established a Safety Health and Environment Committee, under the Chairman general office which is authorised to take comprehensive decisions on Sustainability issues.

P 0.5 / 1 [Source](#)

■ 4. One or more members within the board of the company have responsibility for sustainability?

✘ 0 / 1

<input type="checkbox"/> 5. Percentage or number of women in senior management team? 560 - Data as of 2018.	✓	1 / 1	Source
<input type="checkbox"/> 6. Percentage or number of women board members? This indicator is disabled as the company is private.	✗	0 / 1	
<input checked="" type="checkbox"/> 7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with timber and pulp production? TFA 2020, HCSA, HCVRN and Natural Capital Coalition.	✓	1 / 1	Source
<input checked="" type="checkbox"/> 8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with timber and pulp production? United Nations Global Compact China, a regional network dedicated to promoting the sustainable development of Chinese enterprises. Information as of 2017.	P	0.5 / 1	Source
<input type="checkbox"/> 9. Sustainability report published within last two years? 2018.	✓	1 / 1	Source
<input type="checkbox"/> 10. Reports through standardised reporting systems? Company's Sustainability Report 2018 has been prepared in accordance with GRI standards but the same is not available in the GRI database.	P	0.5 / 1	Source
<input checked="" type="checkbox"/> 11. Climate risks assessment available?	✗	0 / 1	
<input checked="" type="checkbox"/> 12. Natural capital assessment available?	✗	0 / 1	



> Landbank, maps and traceability

5.14 / 22 23.1%



<input type="checkbox"/> 13. Lists countries and operations? The company has plantations as well as pulp and paper mills in China.	✓	1 / 1	Source
<input type="checkbox"/> 14. Lists countries sourcing from?	✗	0 / 1	
<input type="checkbox"/> 15. Total area of natural forest designated for wood/wood fibre production (ha)? This indicator is disabled as the company reports that it only produces wood/wood fibre from plantation forests.			
<input type="checkbox"/> 16. Total area of forest plantation (ha)? 280,065	✓	1 / 1	Source
<input type="checkbox"/> 17. Area of plantation/natural forest within outgrower schemes (ha)?	✗	0 / 1	

<input type="checkbox"/> 18. Unplanted (areas designated for future development as plantation forest) (ha)?	✗	0 / 1
<input type="checkbox"/> 19. Conservation set-aside area, including HCV area (ha)?	✓	1 / 1 Source
<input type="checkbox"/> 20. Area of Intact Forest Landscape (ha)?	✗	0 / 1
<input type="checkbox"/> 21. Number of Forest Management Units (FMUs)? The company only states it has over 20 plantation farms and this information is undated.	✗	0 / 1 Source
<input type="checkbox"/> 22. Maps of forest management units (FMUs)?	✗	0 / 1
<input type="checkbox"/> 23. Forest management plans available for all FMUs?	✗	0 / 1
<input type="checkbox"/> 24. Monitoring of forest management plan implementation available?	✗	0 / 1
<input type="checkbox"/> 25. Company has provided valid legal documents to Open Timber Portal on use right (at the time of SPOTT assessments)? This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.		
<input type="checkbox"/> 26. Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)? This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.		
<input type="checkbox"/> 27. Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)? This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.		
<input type="checkbox"/> 28. Names and locations of all third-party supplying FMUs?	✗	0 / 1
<input type="checkbox"/> 29. Number of company owned sawmills? This indicator is disabled as the company reports that it doesn't own sawmills.		
<input type="checkbox"/> 30. Names and locations of company owned sawmills? This indicator is disabled as the company reports that it doesn't own sawmills.		
<input type="checkbox"/> 31. Number of company-owned pulp and paper mills?	✓	1 / 1 Source
<input type="checkbox"/> 32. Names and locations of company-owned pulp and paper mills?	✗	0 / 1

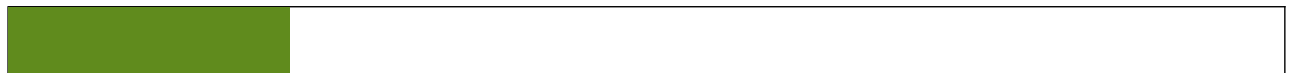
<p><input type="checkbox"/> 33. Reports total volumes (or percentages) sourced by company-owned sawmills that come from company's own operations and/or third-parties? This indicator is disabled as the company reports that it doesn't own sawmills.</p>	X	0 / 1
<p><input type="checkbox"/> 34. Reports total volumes (or percentages) sourced by company-owned pulp and paper mills that come from company's own operations and/or third-parties?</p>	X	0 / 1
<p><input type="checkbox"/> 35. Number of third party supplying mills?</p>	X	0 / 1
<p><input type="checkbox"/> 36. Names and locations of all third party supplying mills?</p>	X	0 / 1
<p><input type="checkbox"/> 37. Reports total volume (or percentages) sourced from third-party supplying mills that come from the supplying mills' own operations and/or third parties?</p>	X	0 / 1
<p><input type="checkbox"/> 38. Procedures to trace raw materials to country of harvest? The company has PEFC CoC certification for some of its subsidiaries, however, it is unclear if this covers all of its operations.</p>	P	0.5 / 1 Source
<p><input type="checkbox"/> 39. Percentage of supply traceable to country of harvest? PEFC CoC-certified pulp procured accounts for 14.23% of all pulp purchased and PEFC CoC-certified wood fibre accounts for 17.45% of all wood fibre purchased.</p>	P	0.14 / 1 Source
<p><input type="checkbox"/> 40. Procedures to trace raw materials to FMU level? The company makes this commitment through the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). As the Standard's requirements do not fully meet the SPOTT indicator criteria partial points have been awarded on the basis of the company's PEFC CoC certification.</p>	P	0.5 / 1 Source
<p><input type="checkbox"/> 41. Percentage of supply traceable to FMU level?</p>	X	0 / 1



> Certification standards

2 00 / 0 33 3%

1 media report



<p><input type="checkbox"/> 42. Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved?</p>	X	0 / 1
<p><input type="checkbox"/> 43. Percentage area (ha) verified as being in legal compliance by a third party? 90.93% - The company reports that 90.93% of its forest area to be CFCC/PEFC-certified.</p>	P	0.91 / 1 Source
<p><input type="checkbox"/> 44. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?</p>	X	0 / 1

	P	0.17 / 1	Source
<p>45. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party? 17.45% - The company reports that only 17.45% of total wood procured is certified.</p>			
	X	0 / 1	
<p>46. Percentage area (ha) FSC FM certified?</p>			
	X	0 / 1	
<p>47. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?</p>			
	X	0 / 1	
<p>48. Percentage of wood/wood fibre supply (tonnes) from all suppliers that comes from FSC FM certified areas?</p>			
	✓	1 / 1	Source
<p>49. Commitment to source only wood/wood fibre that meets FSC Controlled Wood and/or PEFC Controversial Sources requirements?</p>			
	P	0.91 / 1	Source
<p>50. Percentage area (ha) PEFC certified (excluding FSC certified area)? 254,660 (90.93%) - The company reports that 90.93% of its forest area is CFCC/PEFC-certified.</p>			



> Deforestation and biodiversity

9.57 / 22 43.5%

1 media report



	✓	1 / 1	Source
<p>51. Commitment to zero deforestation or zero conversion of natural ecosystems?</p>			
	✓	1 / 1	Source
<p>52. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?</p>			
	P	0.5 / 1	Source
<p>53. Criteria for defining deforestation? HCV. No cut-off date is specified by the company.</p>			
	X	0 / 1	
<p>54. Evidence of monitoring deforestation?</p>			
	X	0 / 1	
<p>55. Amount of illegal/non-compliant deforestation recorded?</p>			
	X	0 / 1	
<p>56. Amount of illegal//non-compliant deforestation recorded in supplier operations?</p>			
	X	0 / 1	
<p>57. Commitment to restoration of non-compliant deforestation/conversion?</p>			

<p>58. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</p>	<p>✘</p>	<p>0 / 1</p>
<p>59. Implementing a landscape or jurisdictional level approach?</p>	<p>✘</p>	<p>0 / 1</p>
<p>60. Commitment to biodiversity conservation?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p>61. Commitment to biodiversity conservation applies to all suppliers?</p>	<p>✘</p>	<p>0 / 1</p>
<p>62. Identified species of conservation concern, referencing international or national system of species classification? Species have been identified but not classified according to an appropriate system.</p>	<p>P</p>	<p>0.5 / 1 Source</p>
<p>63. Examples of species and/or habitat conservation management? Compiled the Inventory of Protected State-level Animals and Plants in Hainan to assist employees and contractors in protection efforts. To protect the natural vegetation in mountainous areas, the company sets aside 10-metre buffer zones and plans the composition of tree species according to local conditions.</p>	<p>P +</p>	<p>0.75 / 1 Source 0.91 / 1</p>
<p>64. Commitment to no hunting or only sustainable hunting of species?</p>	<p>✘</p>	<p>0 / 1</p>
<p>65. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?</p>	<p>✘</p>	<p>0 / 1</p>
<p>66. Commitment to protect forest areas from illegal activities? The company commits to eliminate illegal logging. No references to wider forms of illegality could be found.</p>	<p>P</p>	<p>0.5 / 1 Source</p>
<p>67. Commitment to protect forest areas from illegal activities applies to all suppliers?</p>	<p>✘</p>	<p>0 / 1</p>
<p>68. Evidence of protecting forest areas from illegal activities? The company provides only one example of protecting forest areas from illegal activity.</p>	<p>P +</p>	<p>0.5 / 1 0.91 / 1</p>
<p>69. Commitment to no use of genetically modified organisms? The company has made a commitment to not use transgenic tree species.</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p>70. Commitment to no use of genetically modified organisms applies to all suppliers? The company makes this commitment through the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). Full points have therefore been awarded on the basis of the company's PEFC CoC certification.</p>	<p>✓</p>	<p>1 / 1 Source</p>



> HCV, HCS and impact assessments

25 / 100 25%

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71. Commitment to conduct High Conservation Value (HCV) assessments?	✓	1 / 1	Source
72. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?	✓	1 / 1	Source
73. High Conservation Value (HCV) assessments available?	✗	0 / 1	
74. High Conservation Value (HCV) management and monitoring plans available?	✗	0 / 1	
75. Commitment to the High Carbon Stock (HCS) Approach? The company provides commitment towards taking measures in implementing High Conservation Value forests and High Carbon Stock assessments etc. However, It does not specify whether it commits to the HCS Approach.	P	0.5 / 1	Source
76. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?	✗	0 / 1	
77. High Carbon Stock (HCS) assessments available?	✗	0 / 1	
78. Commitment to conduct social and environmental impact assessments (SEIAs)?	✗	0 / 1	
79. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?	✗	0 / 1	
80. Social and environmental impact assessments (SEIAs) available, and associated management and monitoring plans?	✗	0 / 1	
81. Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)? This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.			



> Soils, fire and GHGs

2 / 16 / 20 10.8%

82. Commitment to no planting on peat of any depth?	✗	0 / 1	
83. Commitment to no planting on peat of any depth applies to all suppliers?	✗	0 / 1	

<input type="checkbox"/> 84. Landbank or planted area on peat (ha)?	✗	0 / 1
<input type="checkbox"/> 85. Implementation of commitment to no planting on peat of any depth?	✗	0 / 1
<input type="checkbox"/> 86. Commitment to best management practices for soils and peat?	✗	0 / 1
<input type="checkbox"/> 87. Commitment to best management practices for soils and peat applies to all suppliers?	✗	0 / 1
<input type="checkbox"/> 88. Evidence of best management practices for soils and peat? The company provides evidence of best management practices for soil in its Sustainability reports of 2017 and 2015.	P	0.5 / 2 Source
<input type="checkbox"/> 89. Commitment to reduced impact logging? This indicator is disabled as the company reports that it only produces wood/wood fibre from plantation forests.		
<input type="checkbox"/> 90. Commitment to reduced impact logging applies to all suppliers?	✗	0 / 1
<input type="checkbox"/> 91. Evidence of implementing reduced impact logging practices? This indicator is disabled as the company reports that it only produces wood/wood fibre from plantation forests.		
<input type="checkbox"/> 92. Commitment to zero burning?	✗	0 / 1
<input type="checkbox"/> 93. Commitment to zero burning applies to all suppliers?	✗	0 / 1
<input type="checkbox"/> 94. Evidence of fire monitoring and management? The company states that it has GPS patrol system to strengthen patrol management, and enhances its ability to respond to forest security risks.	P +	0.75 / 1 0.91 / 1
<input type="checkbox"/> 95. Details/number of hotspots/fires in company FMUs?	✗	0 / 1
<input type="checkbox"/> 96. Details/number of hotspots/fires in suppliers operations?	✗	0 / 1
<input type="checkbox"/> 97. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity? The company only states a commitment to reduce GHGs without mentioning time-bound targets.	✗	0 / 1 Source
<input type="checkbox"/> 98. GHG emissions intensity?	✗	0 / 1
<input type="checkbox"/> 99. GHG emissions from land use change?	✗	0 / 1

<input type="checkbox"/> 100. Progress towards commitment to reduce GHG emissions intensity?	✘	0 / 1
<input type="checkbox"/> 101. Methodology used to calculate GHG emissions?	✘	0 / 1



> Water, chemical and waste management

<p>1.25 / 22 19.3%</p>		
<input type="checkbox"/> 102. Time-bound commitment to improve water use intensity?	✘	0 / 1
<input type="checkbox"/> 103. Water use intensity?	✘	0 / 1
<input type="checkbox"/> 104. Progress towards commitment on water use intensity? The company only reports water use figure which has increased from 2017 to 2018.	✘	0 / 1 Source
<input type="checkbox"/> 105. Time-bound commitment to improve water quality (BOD and COD)?	✘	0 / 1
<input type="checkbox"/> 106. Progress towards commitment on water quality (BOD and COD)? The company reports progress data on COD emissions per ton of paper: 0.23kg (2018), 0.26kg (2017) and COD emissions per ton of pulp: 0.94kg (2018), 1.99kg (2017).	P	0.75 / 1 Source
<input type="checkbox"/> 107. Treatment of pulp and paper mill effluent? The company has provided multiple evidence of wastewater treatment.	P	0.75 / 1 Source
<input type="checkbox"/> 108. Evidence of sawmill run-off containment and wastewater treatment? This indicator is disabled as the company reports that it doesn't own sawmills.		
<input type="checkbox"/> 109. Proportion of processing facilities with closed-loop water treatment system?	✘	0 / 1
<input type="checkbox"/> 110. Commitment to protect natural waterways through buffer zones?	✘	0 / 1
<input type="checkbox"/> 111. Implementation of commitment to protect natural waterways through buffer zones?	✘	0 / 1
<input type="checkbox"/> 112. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?	✓	1 / 1 Source
<input type="checkbox"/> 113. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?	✘	0 / 1

<p>114. Evidence of eliminating chlorine and chlorine compounds for bleaching?</p>	✗	0 / 1
<p>115. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?</p>	✓	1 / 1 Source
<p>116. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?</p>	✗	0 / 1
<p>117. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?</p>	✗	0 / 1
<p>118. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?</p>	✗	0 / 1
<p>119. Chemical usage per ha or list of chemicals used?</p>	✗	0 / 1
<p>120. Implementation of commitment to reduce chemical usage?</p>	✗	0 / 2
<p>121. Integrated Pest Management (IPM) approach?</p>	✗	0 / 2
<p>122. Waste management system in place to avoid negative impacts? The company has a waste management system in place and has provided evidence for its implementation.</p>	P	0.75 / 1 Source



> Community, land and labour rights

17.25 / 34 50.7%

⚠ 1 media report



<p>123. Commitment to human rights? The company has a commitment to respect human rights but does not refer to the UN Declaration on Human Rights or UN Guiding Principles on Business and Human Rights.</p>	P	0.5 / 1 Source
<p>124. Commitment to human rights applies to all suppliers?</p>	✓	1 / 1 Source
<p>125. Progress on human rights commitment ?</p>	✗	0 / 1
<p>126. Commitment to respect Indigenous and local communities' rights? The company has a commitment to acknowledge and respect rights of community citizens but does not refer to the UN Declaration on Rights of Indigenous Peoples or ILO Indigenous and Tribal Peoples Convention.</p>	P	0.5 / 1 Source
<p>127. Commitment to Indigenous and local communities' rights applies to all suppliers?</p>		

	P	0.5 / 1	Source
The company makes this commitment through the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). As the Standard's requirements do not fully meet the SPOTT indicator criteria partial points have been awarded on the basis of the company's PEFC CoC certification.			
■ 128. Commitment to respect legal and customary land tenure rights?	✗	0 / 1	
■ 129. Commitment to legal and customary land rights applies to all suppliers?	✓	1 / 1	Source
The company makes this commitment through the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). Full points have therefore been awarded on the basis of the company's PEFC CoC certification.			
■ 130. Commitment to free, prior and informed consent (FPIC)?	✓	1 / 1	Source
■ 131. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?	✗	0 / 1	
■ 132. Details of free, prior and informed consent (FPIC) process available?	✓	1 / 1	Source
■ 133. Examples of local stakeholder engagement to prevent conflicts?	✗	0 / 1	
■ 134. Details of process for addressing land conflicts available?	P	0.5 / 1	Source
The company states only that a conflict/dispute resolution mechanism has been introduced. No further details are available.			
■ 135. Supports the inclusion of women across forestry operations, including addressing barriers faced?	✗	0 / 1	
■ 136. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?			
This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.			
■ 137. Commitment to enable sustainable use of non-timber forest products (NTFPs) by local communities?			
This indicator is disabled as the company reports that it only produces wood/wood fibre from plantation forests.			
■ 138. Commitment to provide essential community services and facilities ?	✓	1 / 1	Source
■ 139. Progress on commitment to provide essential community services and facilities?	P	0.75 / 2	
The company provides several examples of providing essential community services and facilities.			
■ 140. Commitment to provide business/work opportunities for local communities?	✓	1 / 1	Source
■ 141. Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)?			
This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.			

	P	0.5 / 1	Source
<p>142. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles? The company refers to all Fundamental ILO Conventions, except for Minimum Age and Equal Remuneration.</p>			
<p>143. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?</p>	X	0 / 1	
<p>144. Progress on commitment to respect all workers' rights?</p>	X	0 / 1	
<p>145. Commitment to eliminate gender related discrimination with regards to employment?</p>	✓	1 / 1	Source
<p>146. Commitment to eliminate gender related discrimination with regards to employment applies to all suppliers?</p>	X	0 / 1	
<p>147. Progress on commitment to eliminate gender related discrimination with regards to employment?</p>	X	0 / 1	
<p>148. Percentage or number of temporary employees?</p>	✓	1 / 1	Source
<p>149. Percentage or number of women employees? 6,004 - The company reports the number of women directly and indirectly employed as 5,469 and 535 respectively in 2018.</p>	✓	1 / 1	Source
<p>150. Commitment to pay at least minimum wage?</p>	✓	1 / 1	Source
<p>151. Commitment to pay at least minimum wage applies to all suppliers?</p>	X	0 / 1	
<p>152. Progress on commitment to pay at least minimum wage?</p>	X	0 / 1	
<p>153. Reporting of salary by gender?</p>	X	0 / 1	
<p>154. Commitment to address occupational health and safety? The company has a commitment to health and safety but does not make the reference to ILO Code of Practice on Safety and Health in Forestry Work.</p>	P	0.5 / 1	Source
<p>155. Commitment to address occupational health and safety applies to all suppliers?</p>	✓	1 / 1	Source
<p>156. Provision of personal protective equipment and related training? The company states in its Sustainability report 2015 that it provides its workers with PPE and trains them on its correct usage and also provides training on occupational disease prevention and conducts occupational disease exams annually.</p>	P	0.5 / 1	Source
<p>157. Time lost due to work-based injuries?</p>	✓	1 / 1	Source

830.61 - Hours lost per million working hours.

✓ 1 / 1 [Source](#)

■ **158. Number of fatalities as a result of work-based accidents?**

0 - Data as of 2018.



> **Smallholders and suppliers**

1 / 8 12.5%

⚠ 1 media report



■ **159. Commitment to support smallholders?**

✗ 0 / 1

■ **160. Programme to support outgrower scheme and/or independent smallholders?**

✗ 0 / 1

■ **161. Percentage of outgrower scheme and/or independent smallholders involved in programme?**

✗ 0 / 1

■ **162. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?**

The company only states its process to ensure compliance with its policy requirements.

P 0.5 / 1 [Source](#)

■ **163. Number or percentage of suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements?**

✗ 0 / 1

■ **164. Suspension or exclusion criteria for suppliers?**

The company established a supplier blacklist system which states that if a supplier's behavior does not comply with the company's relevant regulations then the company will suspend all cooperation with the supplier. However, no information found regarding timeframes for action.

P 0.5 / 1 [Source](#)

■ **165. Timebound action plans (including Key Performance Indicators) for suppliers to be in compliance with timber and pulp sourcing commitments?**

✗ 0 / 1

■ **166. Proportion of direct and indirect supply that comes from FMUs which are compliant with timber and pulp sourcing policies?**

✗ 0 / 1



> **Governance and grievances**

2.75 / 7 39.3%



■ **167. Commitment to ethical conduct and prohibition of corruption?**

✓ 1 / 1 [Source](#)

■ **168. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?**

✘ 0 / 1

P 0.75 / 1 [Source](#)

■ **169. Progress on commitment to ethical conduct and prohibition of corruption?**

The company states that in 2018 it launched an integrity management framework to conduct anti-corruption training for all of its employees, carry out assessments and due diligence on the risk on projects and business partners, and implement corrective measures in case of violations.

■ **170. Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)?**

This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.

✘ 0 / 1

■ **171. Disclosure of the company's management approach to tax and payments to governments?**

■ **172. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)?**

This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.

P 0.5 / 1 [Source](#)

■ **173. Whistleblowing procedure?**

The company has an email address to report whistleblowing complaints. No further details on the whistleblowing process could be found.

P 0.5 / 1 [Source](#)

■ **174. Own grievance or complaints system open to all stakeholders?**

The company states it has a complaints and disputes mechanism, but only limited information is available on this process.

✘ 0 / 1

■ **175. Details of complaints and grievances disclosed?**