

Pets

# Raw Material Sourcing Policy -Timber Ref: GSUS104c



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## **1** Introduction

Pets at Home is the UK's leading pet care business, providing pet owners with everything they need to look after their pet – from food, toys and bedding, and grooming services, right the way through to first opinion veterinary care. Our purpose is to create a better world for pets and the people who love them.

We recognise that we have an impact on nature and people through our sourcing of products and services. As a leading pet care business, Pets at Home is committed to responsible and sustainable business standards and practices including responsible sourcing. We uphold such standards and practices throughout our own business and joint venture partners and work with our suppliers to promote our approach to be a sustainable and responsible business.

Forests are critical ecosystems for humans, animals and the Earth itself. Vital for sustaining life, they provide essential resources, from medicines to building materials, that we all depend on. Timber products, although deriving from a renewable source, are increasingly in demand and this is driving deforestation. The impacts of deforestation, along with illegal logging and the degradation of forests around the world, has serious impacts on local communities, biodiversity and our ability to slow the impact of climate change. At Pets at Home, we acknowledge our role in this market, as timber-based products are used in some of the accessories we sell. Given timber's environmental and social impact, and our reliance on it, Pets at Home considers timber to be one of our priority raw materials.

This policy outlines Pets at Home's commitment to the responsible sourcing of timber and our expectations of our suppliers. It should be read and observed in conjunction with Pets at Home's Environmental Policy and Supplier Code of Conduct. The policy will be reviewed annually to reflect changes in industry and legislation.

## 2 Purpose and Scope

This policy applies to all own-brand and supplier brand products sold and used within the Pets at Home Group.

Our due diligence focus will be applied to own brand products. We expect our branded suppliers to apply the same level of due diligence to their supply chains and we will require these suppliers to confirm their progress in achieving sustainable raw materials in their products.

## **3** Policy Application

### 3.1 Our Commitments



This policy is aligned to the delivery of our raw material responsible sourcing targets, within which we commit to 100% of timber being sustainably sourced by 2028. Our definition of sustainably sourced is that all timber used in Pets at Home products is:

- Legally harvested and in compliance with relevant national and international legislation
- Not from forests with high conservation value (HCV)\* or from converted or semiconverted natural woodland
- Subject to a due diligence procedure to assess risk and ensure the timber we use in our products is low risk

To meet these objectives, we will:

- Innovate to provide customers with sustainable product choices
- Partner with our suppliers to create better, more sustainable products, using raw materials from sustainable sources
- Where possible support the use of market-based sustainability standards and external certification (e.g. FSC, PEFC, etc)
- Provide support and guidance to our buying, technical teams and suppliers.
- Continue to enhance our Responsible Sourcing Handbook for our suppliers, detailing our policies and guidelines relating to environmental and social impacts
- Monitor, control and review our sourcing impacts through our supplier management processes, reporting progress each year and making improvements towards delivering our ambitions
- Take measures to ensure compliance with the policy and seek to give preference to those suppliers who can balance commercial requirements with meeting our sustainable sourcing standards
- If products are found to be contravening our standards, we will engage with the supplier to put in place appropriate measures to improve practices. Pets at Home ultimately reserve the right to discontinue items or delist suppliers which do not meet the requirements. Any action taken would not affect Pets at Home contractual rights

## 3.2 Products in Scope

Timber is used as a raw material in some of our products, including, but not limited to:

- Cat litter
- Bedding
- Chew toys
- Puppy pads
- Scratching posts
- Small animal hutches, feeding, treats and playthings

These products come in the form of:



- Paper
- Particle board
- Plywood
- Solid wood with bark
- Solid wood without bark
- Wood dust
- Wood pulp
- OSB
- Wood in rough, unprocessed

Out of scope for this policy are products which derive from plants, vines or fruits. In Pets at Home's case, this includes materials that either do not have a timber commodity code or are a waste product of the main crop. Our out-of-scope materials currently include:

- Jute
- Sisal
- Bamboo
- Rattan
- Vine
- Seagrass
- Water hyacinth
- Coconut shell/husk
- Corn leaf
- Loofah
- Pine cone
- Mulberry stick
- Apple stick
- Willow
- Silver Vine

## 3.3 Risk Assessment

As no official list of high-risk countries for timber sourcing exists, a definitive risk profile is difficult to develop. Instead, we must consider deforestation, degradation, conversion, illegal logging, and transhipment in the context of the timber procured for our products. Certification plays an important role in this, since an origin country could be high risk when considered as a whole, but proper certifications can mitigate some of that risk, so Pets at Home has adopted a risk-based approach to its timber sourcing practices. The below forms our risk assessment process:

#### **Country risk assessment**

Utilising country benchmarks, the Forest Country Risk tool and third-party tools where relevant, we consider whether the country of origin is high, medium or low risk. We combine information from these tools with detailed in-house research to build a risk profile that considers the origin country's risk of:

• Deforestation



- Conversion of HCV, converted woodland, or semi-converted woodland
- Degradation
- Illegal logging
- Transhipments

#### Product risk assessment & supply chain complexity

Mapping the Pets at Home supply chain allows the business to understand the landscape of the value chain. From there, the process of product risk assessment begins. For certified products, each product is assessed to verify that a valid Chain of Custody is in place across the supply chain for each product. For products which are uncertified, we assess the supply chain complexity, concentrating on:

- Number of species (if mono material, lower risk)
- Number of trading countries
- Location of processing or manufacturing

#### Supplier engagement and assessment

In tandem, Pets at Home's sourcing team engages with its suppliers on an annual basis to confirm that suppliers' due diligence processes are sufficiently robust and that the supplier can prove their timber-based products are legally sourced and, where possible, are working towards being sustainable as defined by Pets at Home's earlier definition.

## 3.4 Approved Certification Schemes

Whilst there is currently more than one recognised certification body, we have chosen the following as certification standards that all suppliers must conform to, as they meet the UK government's Legality and Sustainability criteria:

- FSC
- PEFC

Pets at Home holds a promotional licence, not a trademark licence. The packaging team and technologists work alongside the sourcing team to ensure correct certification logos are used on own brand packaging. Supplier brands must ensure they meet any certification trademark rules.

## 3.5 Certification Model

Wherever possible, we want our suppliers to transition towards using timber-based products with a valid, intact Chain of Custody.

## 3.6 Records

**Certified products**: Suppliers must be able to retain suitable evidence to confirm that they have purchased certified material including:



• A verified FSC or PEFC certification claim and code on the supplier invoice and/or delivery note

To comply with UKTR, in addition, Pets at Home will require evidence that the timber has been sourced from legally deforested land.

**Uncertified products**: Suppliers must be able to prove that they hold the cutting licence for the land from which the timber is sourced and can demonstrate links in the supply chain through evidence such as invoices and delivery notes.

The above information will be checked as a minimum during onboarding/first production.

## 3.7 Reporting

We publish information on our timber footprint used in our own brand products in our <u>Annual Sustainability report.</u>

## **4** Definitions

Term	Definition	
Timber	A wood product derived from trees and	
	having a timber HS code	
Natural materials	Pets at Home define natural materials as	
	products or materials which derive from	
	plants, vines or fruits	
Conversion	The conversion of primary forests into	
	planted forests.	
Deforestation	Deforestation is the intentional clearing	
	of forested land for agriculture, grazing	
	land, construction or building materials,	
	fuel or other manufacturing needs	
	Definition	
Term	Definition	
Term Degradation	Forest degradation is generally accepted	
	Forest degradation is generally accepted as a forest's inability to provide	
	Forest degradation is generally accepted as a forest's inability to provide ecosystem services (such as habitat	
	Forest degradation is generally accepted as a forest's inability to provide ecosystem services (such as habitat provision for wildlife). Since 2020,	
	Forest degradation is generally accepted as a forest's inability to provide ecosystem services (such as habitat provision for wildlife). Since 2020, countries can develop their own	
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	<ul> <li>Forest degradation is generally accepted as a forest's inability to provide ecosystem services (such as habitat provision for wildlife). Since 2020, countries can develop their own definition of forest degradation.</li> <li>Areas with extremely significant</li> </ul>	
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Degradation	Forest degradation is generally accepted as a forest's inability to provide ecosystem services (such as habitat provision for wildlife). Since 2020, countries can develop their own definition of forest degradation. Areas with extremely significant biological, ecological, social or cultural value – this can be at national, regional or	
Degradation HCV (High Conservation Value)	<ul> <li>Forest degradation is generally accepted as a forest's inability to provide ecosystem services (such as habitat provision for wildlife). Since 2020, countries can develop their own definition of forest degradation.</li> <li>Areas with extremely significant biological, ecological, social or cultural value – this can be at national, regional or international level.</li> </ul>	
Degradation	<ul> <li>Forest degradation is generally accepted as a forest's inability to provide</li> <li>ecosystem services (such as habitat provision for wildlife). Since 2020,</li> <li>countries can develop their own</li> <li>definition of forest degradation.</li> <li>Areas with extremely significant</li> <li>biological, ecological, social or cultural</li> <li>value – this can be at national, regional or</li> </ul>	

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	subject to deforestation or forest	
	degradation after a certain date.	
Chain of Custody	A Chain of Custody is a legal term that	
	covers a process that tracks the life cycle	
	of physical or electronic information.	
UKTR (UK Timber Regulations)	The UKTR are a set of regulations that	
	ensure timber and timber products	
	placed on the market in Great Britain are	
	harvested from legally deforested land.	
	To comply with UKTR, businesses must	
	ensure their products come from legal	
	sources. This is done through the	
	implementation of due diligence	
	processes to verify the legality of the	
	timber / timber-based products.	

## **5** Responsibilities

This policy is owned by the Pets at Home Responsible Product Committee which meets at least quarterly to review our environmental performance in relation to our products and ensure suitable resource is available for its implementation. The policy is approved by our ESG Committee, which operates with delegated authority of our Board, and receives regular updates on performance against our targets.

## 5.1 Expectations of Suppliers

In addition to the requirements set out in our Supplier Code of Conduct and our Terms of Service, we expect our suppliers to support us with working towards our sustainability goals. One of the key expectations is that suppliers are required to provide accurate data on the volume of timber in their product. In addition, we welcome the proposal of new materials and technologies that keep in line with current and upcoming legislation as well as new market developments. It is expected that our suppliers will drive forward innovation regarding sustainable solutions, and work towards their own sustainability commitments in order to find improvements throughout the supply chain.

## 6 Support & Further Resources

Further guidance on our approach to sustainability can be found in our Responsible Sourcing Handbook

- WWF Wood Risk Tool
- Forest Country Risk tool (Book Chain Project)

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