

VERSIÓN: 04

FECHA: 31/05/2023

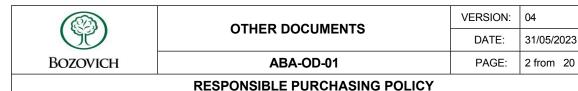
ABA-OD-01

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RESPONSIBLE PURCHASING POLICY



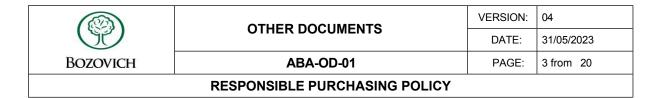
Maderera **Bozovich** s.a.c.



Introduction

Maderera Bozovich S.A.C., founded in 1973, is a leading company in the Peruvian market, being within its field: the commercialisation and manufacture (national and international) of FSC®-100% Certified Wood, FSC® Controlled wood and wood from managed and legal forests.

Our supply model is based on the principles established in this Responsible Purchasing Policy, with the aim of guaranteeing the legal origin of the wood, which must come from forests that comply with all the requirements dictated by the legal regulations of our country.



Responsible Purchasing Policy

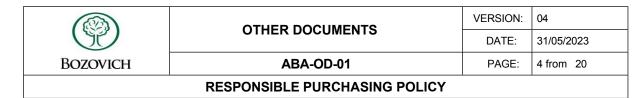
To generate a competitive advantage through transparent, efficient and innovative management (recognising the environment as our main partner), in order to obtain environmental, social and economic benefits as a result.

Our ultimate goal is to purchase, process and market timber of legal origin FSC® 100%, FSC® Controlled, other certification systems, and other timber of legal origin from sustainable forests with forest management plans approved by the competent authority in our country.

Our priorities are:

- → Improve the quality, safety and ethical and industrial development of our suppliers.
- → To foster excellence in our employees, in pursuit of their well-being and that of society.
- \rightarrow Exceeding the expectations of our customers.

THE COMPANY



Mission of the policy:

This Management System is a tool that will allow us to comply with our responsible purchasing policies, in the search for a timber supply that assures the organisation that it manufactures and distributes timber of legal origin.

This document is addressed to all those responsible for the company's Supply Chain, suppliers, direct and indirect customers and other stakeholders.

Objectives:

- ✓ Improve our sourcing by increasing our supply of wood from FSC®-100% FSC® Certified forests and FSC® Controlled Wood forests.
- ✓ Promote controlled wood certification schemes to our suppliers, in the quest to improve our legal sourcing.
- ✓ Acquire timber from legal sources, verifying the documentary traceability of our products from the forest of origin, through the services provided by the authorities. forestry.
- ✓ Contribute through our Responsible Policy to the sustainability of forests and their ecosystem.
- ✓ To provide our customers with the assurance that we trade in legally sourced timber by defining responsible purchasing policies and procedures.



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Certifications

Our company has the following certifications in force:

FSC® Chain of Custody Certification No. Since 2006.

SGSCH-COC-002228

FSC® (Forest Stewardship Council) is a non-governmental accreditation and certification organisation based in Bonn, Germany.

FSC® Peru is an association made up of various institutions and individuals who are interested in promoting forest management and voluntary forest certification, from the perspective of economic, social and/or environmental interests, and has been recognised and accredited by the Forest Stewardship Council (FSC®) as a National Forest Certification Office since 2010.

▶ BASC Certification, for safe international trade No., PERLIM00283-1-9. Since 2008.

BASC (Business Alliance for Secure Commerce) is an international non-profit business alliance that promotes secure trade in cooperation with governments and international organisations through the implementation of a Security and Control Management System for the continuous improvement of security standards.

BASC PERU is the national chapter of the World BASC Organization (WBO), founded in December 1997 with the mission to promote a culture of security prevention in the Peruvian foreign trade supply chain.

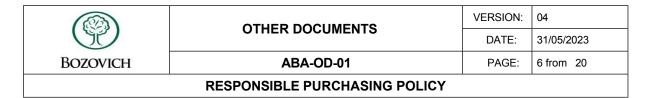
Participation in the "National Pact for Legal Timber" since its launch in 2015.

It is an initiative launched by the Peruvian government in alliance with NGOs led by WWF (World Wildlife Fund), forest producers, private enterprise, indigenous organisations, the financial sector and civil society, whose objective is to increase the trade of legally sourced timber, aligning the visions of all actors directly related to the supply chain of timber products (public and private) in order to achieve a legal and sustainable forestry sector.

> Authorised Economic Operator (AEO) certification:

As Exporter: NATIONAL INTENDANCE RESOLUTION N° 000 320000/2022-000047 As Importer: NATIONAL INTENDANCE RESOLUTION N° 000 320000/2022-000048

The authorised economic operator is that foreign trade operator that complies with the established regulations in force, an adequate system of accounting and logistical records, financial solvency and adequate level of security; becoming a trusted operator for the Customs Administration, which simplifies its controls and procedures; to date, the following operators can be certified as AEO: importers, exporters, customs warehouses, customs agencies and fast delivery service companies.



Outreach

Maderera Bozovich SAC in order to strengthen its purchasing policies decided to document, implement, maintain and continuously improve a due diligence management system in accordance with:

- The rules established in the Peruvian Legislation.
 - → Forestry Law 29763 and its regulations.
 - → Regulation of Legislative Decree No.1085
 - → Other government regulations (tax, customs, regional and any others) that have an impact on the process of buying and selling timber products.
- The legal requirements of the European Union

EUTR. REGULATION (EU) No 995/2010 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL,

of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market

http://eur-lex.europa.eu/legal-content/ES/ALL/?uri=CELEX:32010R0995

US legal requirements - LACEY ACT.

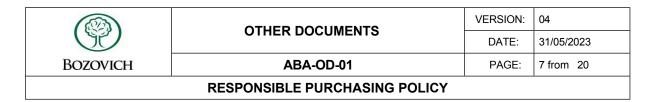
In 2008, the US Congress passed a new law making it illegal to import, export, transport, sell, receive, receive, acquire or purchase interstate or internationally any plant harvested or traded contrary to the laws of the United States, a US state, or relevant foreign laws.

https://www.aphis.usda.gov/aphis/ourfocus/planthealth/import-information/lacey-act/lacey-act

The legal requirements of the Australian Illegal Logging Prohibition Act No. 166-2012, as amended.

On 30 November 2012, the Australian Illegal Logging Prohibition Act - 2012 came into force as a result of five years of extensive discussions involving the timber industry (both Australian and major timber supplying countries) and NGOs.

https://www.legislation.gov.au/Details/C2013C00148



Process for implementing the Responsible Purchasing Policy

Our due diligence purchasing policy applies to all raw materials and wood products purchased by our company. It should be noted that we are committed to exclude the purchase of timber that originates or may originate from timber titles that contribute to land conversion and subsequent deforestation of the forest.

Within our sources of supply we identify two groups of purchases, which are as follows:

A. Purchase of FSC® Certified Wood

- 1. 100% FSC® Certified Forests
- 2. FSC® Controlled Wood Forests.

These are covered by the use of our FSC® Chain of Custody.

B. <u>Purchase of non-certified timber</u>

For the purchase of this timber group, we use the consultation tools provided by OSINFOR (Forest and Wildlife Resources Oversight Agency) to the general public, through its website www.osinfor.gob.pe.

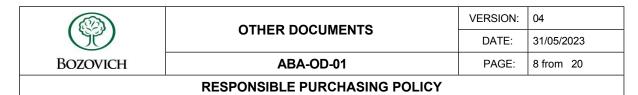
These controls used are detailed below:

- 1. **Enabling Title Information Traceability Report:** Contains historical information on the enabling title and its forest management plans for the different harvesting modalities.
- 2. OBSERVATORY OSINFOR (Supervisions during and after Extraction), within this window we have:
 - Green List Risk-free timber for the purchase of legal timber as determined by POA and Zafra. Timber qualified for purchase.
 - Red List Timber at risk for legal timber procurement as determined by POA and Zafra.
 Timber not eligible for purchase.
- **3.** The authorisations that do <u>not appear</u> in the SIGO OSINFOR Observatory (which are awaiting their respective inspections), must present documentation that supports the fulfilment of all their forestry obligations, among others.

If you are in agreement, and having knowledge of the supplier's history, we proceed with the purchase, verifying documentary traceability and legality from origin.

For all timber falling into this category, each supplier must sign a sworn declaration (DDJJ) attesting under oath that the origin of the timber is legal.

In case of NON CONFORMITY, we are exempt from the purchase.



□ Control System

All wood that enters Maderera Bozovich S.A.C. undergoes a strict documentary and physical control in accordance with the selection procedures detailed above, ensuring that it complies with the requirements of Peruvian regulations.

Failure to comply with the requirements of our management system and the detection of irregularities will result in the immediate suspension of the business relationship with the supplier.

The commercial relationship will be re-evaluated, provided that the observations and/or reasons for exclusion duly substantiated by the supplier are rectified.

The overall responsibility for compliance with this management system and its updating lies with the Deputy Supply Management.

I. Human Resources involved:

The personnel directly involved in the activities of the Responsible Purchasing Policy for the company's procurement are the:

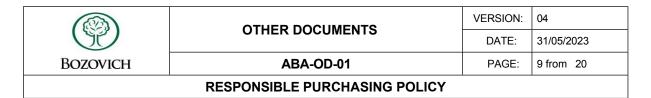
Staff of the Supply Area.

Personnel indirectly involved in the activities of the Responsible Sourcing policy for the company's sourcing include:

- General Management
- > Supported by Administrative Staff from other areas, such as:
 - Security Area
 - Finance Area
 - External Logistics Area
 - Accounting Area
- Supervised by external legal counsel.
- Finally, the International Sales Area, which audits prior to export.

II. <u>Training, awareness-raising and skills:</u>

All personnel involved in sourcing activities should be properly trained to apply the due diligence management system.



III. Records and documentation:

All due diligence documentary records are stored virtually within our management system and the custodian of our physical documents is the following areas:

- → Supply
- → Foreign trade
- → Accounting

Among the records and documents, we have:

- ✓ A Purchasing Protocol, specifying all the documents involved in each purchase and the responsible purchasing procedures.
- ✓ 100% of purchases are registered in our commercial system.
- Supplier due diligence file, the objective of which is to "know our supplier", comprising:
 - Supplier's file: In this format it allows to detail the following:

a) Company Details

This information is obtained from the SUNAT website: www.sunat.gob.pe (1). In turn, the legal representatives are identified, who will be verified on the RENIEC website: www.reniec.gob.pe (2).

b) Contact Information

This information is provided by the supplier, who designates the information of the persons with whom we will be in constant contact.

c) Commitment of the Selling Supplier

Information on the commitment that the supplier must fulfil and be diligent in its sales, maintaining a healthy commercial relationship within the current legal framework.

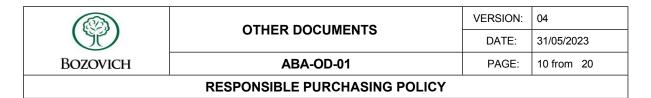
d) Wooden Fountains

It indicates in general terms the area of origin of the timber, the main species traded, etc. This information is updated annually and/or as necessary.

Evidence of visits, purchase orders, minutes and other additional evidence.

✓ Other documents:

a. <u>Accounting documents:</u> These comprise purchase invoices, GRRs, GRRs, invoices for additional services such as transport, commission, reordering of timber, etc. that accompany each purchase, which are managed and stored by the Accounting Area, and the Procurement Area stores copies of the aforementioned documents.



- b. <u>Documentary Traceability and Forest Legality Documents:</u> These include the Forest Transport Guides (GTF), PO approval resolutions and all the documentation that allows verifying the documentary traceability of the timber from the origin and allows determining the legality of the same, the custody of which is in charge of the Supply Area.
- c. <u>Additional and internal documents</u>: Constancia de Verificación de Pesos y Medidas (CVPM), Declaraciones Juradas (DDJJ), etc., are stored in the archives of the Supply Area.

IV. Implementation and Operation of the Due Diligence Management System:

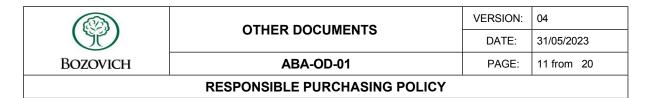
Due diligence is based on the Peruvian Forestry Law N° 29763 and its regulations, on the requirements of the certification standard, on external laws such as the US LACEY ACT, EUTR. REGULATION (EU) No. 995/2010 and the Australian Illegal Logging Prohibition Act No. 166-2012. Accordingly, the following applies:

- Information that is provided by Maderera Bozovich SAC: All information about the origin and legality of the timber required by the Forestry Law and at the request of our customers, is collected as mentioned in our purchasing protocol.
- Identification of legal and other requirements: It is important to have up-to-date legal requirements applicable at national level, in order to minimise risks for the company.
- Assessment of Source Risk parameters: A risk rating will be scheduled annually, based on updates from State sources, organisations, sanctions, resolutions and others.

Types of risks:

- Very low risk: Wood from 100% FSC® Certified or FSC® Controlled wood areas.
- Low risk: Regions where there is active government presence, supply chain, high level of traceability.
- <u>Unspecified Risk:</u> Wood that does not have an immediate guarantee, so further review is required.
- Unacceptable Risk: Wood coming from POs/Zafras with a Precautionary Measure and/or Expiry Order.

In the first three cases, after a thorough review of the documentation related to traceability and legality, the existence of risk is minimised as much as possible and the purchase is made.



 Supplier Risk Parameter Assessment: This is based on a detailed assessment of the supplier's sources that will result in a classification as a high, medium or low supplier.
 risk.

Through the information provided by the supplier (logging contract, resolutions of approval of operational plans (OP), permit approval, etc.), the legality and traceability of the documentation is verified. Additionally, a review of the information is carried out by analysing the supplier's FILE and its performance history.

Suppliers without such information and who do not provide information on the traceability and legality of their timber are classified as high risk suppliers, and therefore the purchase will not be made until the requested information is obtained and the supplier is categorised as medium risk.

We will also work with suppliers to re-categorise them from medium to low risk.

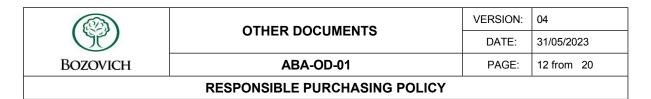
 Assessment of Product Risk Parameters: Continuing with the risk assessments we proceed according to the category of wood/product being purchased, which are as follows following:

A. 100% FSC® Certified Wood or FSC® Controlled Wood

- Visits to the supplier's website.
- See page FSC®. www.fsc.org.pe
- Review certified timber according to:
 - → Chain of Custody (to be included in the invoice)
 - → Forest Certification Code (indicated on the invoice)
 - → Reguest a copy of the FSC certificate.

B. Wood from Non-FSC® or Non-FSC® Controlled Forests.

- Deepen due diligence assessment of legal origin and documentary traceability.
- Encourage the supplier to apply for Controlled Wood Certification or third party legal verification (Controlled Wood FSC, VLC).
- Encourage the supplier to request prior inspections from OSINFOR.
- For all timber falling into this category, each supplier shall sign a sworn declaration (DDJJ) attesting under oath that the origin of the timber is Legal.



V. Results of the risk assessment:

In relation to <u>our company:</u> The control programmes and improvement of procedures seek to minimise risk and improve our performance as environmental partners, supporting governmental entities such as OSINFOR, SERFOR, SUNAT, ETC.

In relation to our suppliers:

- Suppliers that are part of a supply chain be they traders, traders, commission agents must ensure that they have the necessary documentation to support the supply chain.
 legality of the timber and its documentary traceability from the origin.
- Suppliers who are concessionaires and extract directly from their forests must ensure that they
 control legality throughout their operations; and that they are part of a
 continuous improvement, based on the implementation of management systems.

VI. <u>Improvement objective:</u>

Monitoring, measuring, auditing and reviewing the supply chain ensures continuous improvement, therefore Maderera Bozovich SAC has specific goals:

- Encourage their suppliers to achieve quality standards that allow them to certify their forests as FSC® Controlled Wood or other Forest Management certification systems.
 Sustainable.
- Encourage suppliers to voluntarily request OSINFOR to carry out inspections prior to and during the operations of the permits whose timber they are going to use.

VII. Monitoring and measurement:

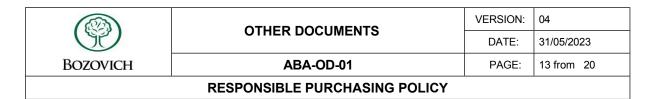
Visits will be made to suppliers at their places of operation, which will allow us to get to know the reality of their operation, location, processes, documentation, etc. The interview with the supplier will allow us to verify the reliability of the information provided, which will be cross-checked with that registered with state bodies, suppliers and stakeholders.

Viewings will be scheduled on a zonal basis and will be subject to our projected annual purchases.

Second party internal audits will be carried out to verify the performance of our suppliers' Due Diligence Management System and determine the necessary adjustments in pursuit of continuous improvement.

The internal audit involves making an overall assessment of the supplier (supplier file), and if they do not comply with the requirements of the legality verification of their sources, they are classified as medium or high risk suppliers, therefore, action must be taken, eliminating sources whose risk category are unacceptable from their supply chain in order to eliminate the risk.

In addition, and finally, in order to verify compliance with our Responsible Purchasing Policy set out in this document, regular internal audits of the Procurement Area will be scheduled.



VIII. Non-conformities, corrective and preventive actions

Based on the findings of internal and external audits, preventive and corrective actions will be recommended, which will be recorded in the supplier files for further follow-up, if applicable.

It is important to note that, as a result of preventive and corrective actions, continuous improvement is achieved.

IX. Due Diligence Management System reviews to ensure continuous improvement.

Procurement-related executives and all Procurement team members should participate in the annual review of our due diligence system, taking into account the following considerations:

- 1. Random second party audits of the supplier's files for each region.
- 2. Verify compliance with the Due Diligence Management System.
- 3. Measuring its efficiency.

✓ EXCHANGE CONTROL:

Description of the change	Responsible	Date of modification	New Version
Whole document - creation of the document	Patricia Bottger Cárdenas	04/01/2016	01
Whole document - Update	Patricia Bottger Cárdenas	31/05/2023	04



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FLUJOGRAMA DE COMPRA DE MATERIA PRIMA

Nuestro objetivo es verificar la legalidad de la madera que estamos comprando, minimizando riesgos para la Compañía

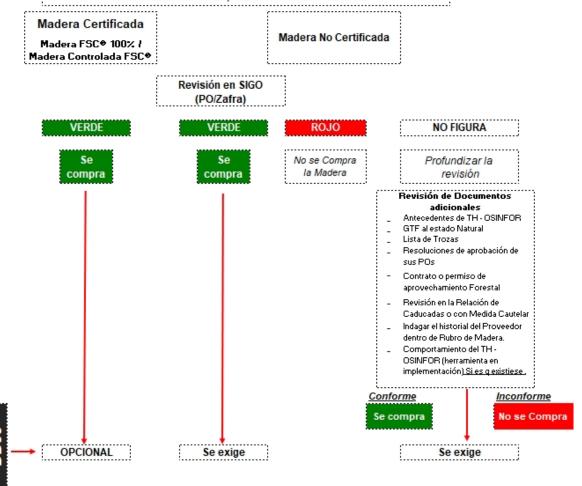
Evaluación de Riesgos

Obtener la documentación

- 1 Check List. (doto. Interno)
- 2 Guía de Remisión Remitente (GRR) (Destinatario Sunat)
- 3 Guía de Remisión Transportista (GRT) (Destinatario Sunat)
- 4 Constancia de verificación de pesos y medidas (CVPM) Sutran/MTC
- 5 Detalle de medidas de la madera
- 6 Guía de Transporte forestal (GTF), y anexos.

Revisión exhaustiva del contenido de todos los documentos mencionados.

Con todo conforme se procede a identificar la fuente.





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Certificate SGSCH-COC-002228, continued

MADERERA BOZOVICH S.A.C.

FSC® Chain-of-Custody

Issue 14

detailed scope

The purchase of FSC 100%, FSC Mix and wood products, and FSC 100% wood charcoal for storage, processing, drying and selling lumber and wood products FSC 100%, FSC Mix, and wood charcoal FSC 100% (Transfer System) in a multi site certification for their production facility at Peru, warehouse in Mexico, office in USA and outsourced warehouses in USA.

La compra de madera sólida y productos madereros FSC 100%, FSC Mixto y carbón vegetal FSC 100% para el depósito, procesado, secado y venta de madera sólida y productos madereros FSC 100%, FSC Mixto y carbón vegetal FSC 100% (Sistema de Transferencia) en una certificación multisitio de su planta en Perú, almacén en México, oficina en Estados Unidos, almacenes tercerizados en Estados Unidos.

The covered products and processes are performed by the network of sites and not necessarily by each of them.

Additional facilities

BOZOVICH USA - Bozovich Timber Products Inc. (BTP), 9600 Escarpment Blvd. Suite 745 PMB 32, Austin, TX, United States.

BOZOVICH MEXICO - Bozovich S.R.L. de C.V. (BZM), Av. del Carretera Estatal 100 "El Colorado – Higuerillas" No. 4200, Lote-2, San Ildefonso, Collón, Queretaro, México.



The mark of responsible forestry

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ADA OD 01

RESPONSIBLE PURCHASING POLICY



BUSINESS ALLIANCE FOR SECURE COMMERCE

World BASC Organization

Certifies that: Certifica que:

MADERERA BOZOVICH S.A.C.

Calle F S/N - Urbanización Santa Genoveva - Lurín - Lima - Lima

Has been audited and approved based on the BASC International Norm and Standards, Version 5-2017, in Line with C-TPAT Minimum Security Requirements, under Standard No. 5.0.1. Scope: Exporter of Wood in Lima, Peru.

Ha sido evaluada y aprobada con respecto a la Norma y Estándares Internacionales BASC Versión 5-2017, alineado con Requerimientos Mínimos de Seguridad C-TPAT, bajo el Estándar No. 5.0.1. Alcance: Exportador de Madera en Lima, Perú.

This certificate is subject to continued compliance with the BASC International Norm and Standards pertinent to the certified company.

Esta aprobación está sujeta al cumplimiento continuo de la Norma y Estándares Internacionales BASC correspondientes a la empresa certificada.

Certification / Certificación Nº PERLIM00283-1-16

Issued/Expedición: 2023-01-30



Expires/Vencimiento: 2024-01-30

E. Erik Moncayo

Erik Moncayo
Presidente Internacional
World BASC Organization

Isaura Delgado B.

Isaura Delgado Brayfield Presidente Junta Directiva BASC Perú César Venegas N.

César Augusto Venegas Núñez Director Ejecutivo BASC Perú

Security Code WBO

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RESPONSIBLE PURCHASING POLICY



DECLARACION DE INTENCIÓN PACTO NACIONAL POR LA MADERA LEGAL

El Gobierno Peruano en alianza con los productores forestales, la empresa privada, las organizaciones indigenas, el sector financiero y la sociedad civil, lanza la iniciativa denominada: "Pacto Nacional por la Madera Legal", cuyo objetivo es lograr que al 2021 TODA la madera producida en el Perú, sea para el comercio nacional o la exportación provenga únicamente de fuentes legales verificadas.

Para lograr esta meta, el Estado peruano en su conjunto, al lado de los que se adhieran a esta declaración, diseñarán y ejecutarán una estrategia que será la guía para que productores, vendedores, compradores intermedios, transformadores y consumidores finales únicamente vendan, procesen, distribuyan y adquieran, madera cuya PROCEDENCIA LEGAL HAYA SIDO VERIFICADA.

Todos los firmantes de esta iniciativa nos comprometemos a definir protocolos para que desde cualquiera de nuestras áreas de intervención, actividades comerciales y prácticas cotidianas sólo estemos vinculados con MADERA DE ORIGEN LEGAL.

Invitaremos a otros a sumarse a la iniciativa y trabajaremos por involucrar a más actores que asuman el compromiso de producir, transformar, usar, comprar y vender sólo madera legal que provenga de bosques manejados y plantaciones forestales.

Promoveremos además el manejo forestal sostenible con uso de técnicas de bajo impacto para el aprovechamiento forestal, que permitan también reducir emisiones del sector forestal.

En nuestros proyectos, construcciones, casas, negocios y otros espacios de uso de madera, al 2021 garantizaremos la existencia sólo de MADERA DE ORIGEN LEGAL.



Es nuestro compromiso con el bosque, los ciudadanos y ciudadanas del Perú y nuestro aporte en la lucha contra el cambio climático en el marco de la COP 20.

Lima, 11 de Diciembre de 2014.

Document signed by the Legal Timber Pact



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Declaración de adhesión al:

"Pacto Nacional por la Madera Legal"

El adherente al "Pacto Nacional por la Madera Legal", según corresponda a la naturaleza de sus actividades, funciones o a su ámbito y objetivos institucionales, se compromete a:

- Fomentar la incorporación de políticas, prácticas y acciones orientadas a asegurar que el aprovechamiento, la transformación primaria y secundaria, el transporte, la comercialización y el uso de la madera y de sus derivados e, igualmente, la financiación de estas actividades; se realicen única y exclusivamente bajo el cumplimiento de procedimientos que permitan demostrar su procedencia legal.
- Llevar a cabo las acciones de coordinación (interna y externa) para asegurar la adopción de políticas, normativas y demás acciones pertinentes para el desarrollo, cumplimiento y fortalecimiento del presente Pacto.
- 3. Promover el establecimiento de códigos de conducta y políticas de adquisición y compra responsable donde se incorpore el compromiso de no acudir -bajo ninguna circunstancia- al uso de prácticas comerciales para la adquisición y venta de madera y sus derivados, sin la observancia de los requisitos legales.
- Fomentar el uso de medios de verificación que permitan demostrar el cumplimiento de la normatividad vigente y asegurar que la madera y sus productos derivados provienen de fuentes legales verificables.
- Promover la implementación progresiva de mecanismos e incentivos que fomenten el crecimiento del comercio de madera y sus derivados de origen legal.
- 6. Llevar a cabo, según corresponda, las actividades de supervisión y de control orientadas a asegurar que el aprovechamiento, la transformación primaria y secundaria, así como el transporte, la comercialización y uso de la madera se realicen, única y exclusivamente, con la observancia de las normas vigentes.
- 7. Difundir la iniciativa "Pacto Nacional por la Madera Legal" y apoyarla implementación de la estrategia de comunicaciones a través de comunicaciones escritas, información en páginas web institucionales, redes sociales, campañas de sensibilización y otros canales a su alcance.

Firma

IVO BOZOVICH NORIEGA GERENTE GENERAL

MADERERA BOZOVICH S.A.C.







Ministerio del Ambiente









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	Prepared by:	Reviewed by:	Approved by:
Signature:			
Name and Surname:	Patricia Bottger Cardenas	Ivo Bozovich Noriega	Ivo Bozovich Noriega
Position:	Deputy Supply Manager	General Manager	General Manager