



SUMMARY
of the due diligence system
of JSC Ilim Group

St. Petersburg
2021

INTRODUCTION

Ilim Group Joint Stock Company (hereinafter, Ilim Group) is the largest pulp and paper company in Russia with a full wood harvesting and value-added wood processing cycle. Ilim Group accounts for 75% of all domestically produced pulp, 20% of paperboard and 10% of paper. The Company's annual output of pulp and paper products exceeds three (3) million tons. Ilim Group is headquartered in St. Petersburg.

Ilim's products are manufactured at three pulp and paper mills located in Koryazhma, Bratsk and Ust-Ilimsk, each of which has the status of Ilim Group Branch.

Forest Branches of Ilim Group in Koryazhma, Bratsk and Ust-Ilimsk ensure wood supply to the Mills.

Timberlands leased by Ilim are certified in accordance with FSC standards (FSC-C013771, FSC-C129100, FSC-C129102, FSC-C129099).

Ilim's FSC-certified timberlands cover 6.8 million hectares. Ilim Group holds GFA-COC-001770 Chain of Custody and Controlled Wood certificate (FSC-C013771).

A due diligence system (DDS) and verification of compliance with the requirements for FSC-controlled wood according to FSC-STD 40-005 V 3-1 standard are in place with regard to timber purchased from non-certified suppliers, from certified suppliers that supply non-certified wood products (hereinafter, non-certified suppliers) as well as timber harvested by the Forest Branches on non-certified timberlands.

Due diligence system is a system to trace the origin of wood and wood flow from a harvesting area (a cutting block) to a mill, as well as a system involving actions and procedures aimed to collect information from wood suppliers and sub-suppliers, assess them and implement control measures to mitigate risks of sourcing wood from unacceptable sources.

1. DDS scope and applicable risk assessment

1.1. The due diligence system of Ilim Group applies to wood origins (supply areas), species of sourced wood and supply chains from supply areas to the destination points located at the sites of Ilim Group Branches specified in Table 1.

Table 1

Species and origins of wood delivered to Ilim Group Branches

Ilim Group Branch	Species	Supply areas	Destination point
Koryazhma Forest of Ilim Group	Scots Pine (<i>Pinus sylvestris</i>) European Spruce (<i>Picea abies</i>) Drooping birch (<i>Bétula péndula</i>) Downy birch (<i>Bétula pubescens</i>) Aspen (<i>Populus tremula</i>)	Republic of Komi, Arkhangelsk, Vologda, Kirov and Kostroma Oblasts	Koryazhma, Arkhangelsk Oblast
Bratsk Forest of Ilim Group	Scots Pine (<i>Pinus sylvestris</i>) Siberian pine (<i>Picea obovata</i>) Larch (<i>Larix sibirica</i>)	Irkutsk Oblast Krasnoyarsk Territory	Bratsk, Irkutsk Oblast
Ust-Ilimsk Forest of Ilim Group	Siberian larch (<i>Abies sibirica</i>) Siberian pine (<i>Pinus sibirica</i>)		Ust-Ilimsk, Irkutsk Oblast

	Drooping birch (<i>Bétula péndula</i>) Downy birch (<i>Bétula pubescens</i>) Aspen (<i>Populus tremula</i>)		
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1.2. In accordance with paragraph 3.1 of FSC-STD-40-005 standard (version 3-1), National Risk Assessment (FSC-NRA-RU V1-1) approved on December 11, 2018 (hereinafter, NRA 1-1) shall be applied to FSC-controlled wood from all sources (supply areas) specified in Table 1.

1.3. A consolidated assessment of risks relative to controlled wood in all regions of the Russian Federation is specified in Table 2.

Table 2

Consolidated assessment of risks relative to controlled wood in all regions of the Russian Federation

Controlled wood category		Risk level
1	Illegally harvested wood	Specified risk
2	Wood harvested in violation of traditional and civil rights	
3	Wood from forests where high conservation values are threatened by management activities	
4	Wood from forests being converted to plantations or non-forest use	Low risk
5	Wood from forests where genetically modified trees are planted	

2. Procedure for handling stakeholders' complaints regarding DDS

2.1. Ilim Group handles complaints relative to controlled wood at the Forest Branch and HO levels. People responsible for handling complaints are listed below:

Site	Full name, position and contact information of a specialist responsible for handling complaints
Head Office	Elena Pyankova Chief Specialist, SCM, Forest Resources and Forest Certification tel.: +7(812)718-54-02 mob.: +7(921)245-31-59 elena.piankova@ilimgroup.ru
Koryazhma Forest of Ilim Group	Aleksandr Malkov Lead Specialist, Contractual and Claims Work tel.: +7(81850)4-55-79 mob.: +7(921)483-28-31 aleksandr.malkov@krm.ilimgroup.ru
Bratsk Forest of Ilim Group	Natalia Aleksandrova Chief Specialists, Due Diligence tel.: +7 (3953) 34-04-63 mob.: +7 (902) 514-00-66 natalya.aleksandrova@brk.ilimgroup.ru
Ust-Ilimsk Forest of Ilim Group	Anna Pyankova Lead Engineer, Forest Certification tel.: +7 (39535) 92-433

	mob.: +7 (950) 148-74-47 anna.slavuta@usk.ilimgroup.ru
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2.2. Procedure for handling stakeholders' complaints includes the following actions:

1) Register a written complaint submitted by mail, e-mail or fax in a logbook for registration of complaints relative to controlled wood. Notify the applicant that his/her complaint has been received and will be resolved within two (2) weeks from the receipt date.

Note. Anonymous complaints shall not be accepted.

2) Perform a preliminary assessment to check whether the complaint in question is classified as essential in terms of the risk of wood sourcing from unacceptable sources.

Note. A complaint is classified as essential if an evidence specified in such complaint relates to a risk included in NRA 1-1 scope (Table 2).

3) Hold a dialog with the applicant aimed to settle the complaint classified as essential one within thirty (30) days from the receipt date before taking any further actions.

4) Investigate complaint within two (2) months from the receipt date if it is not possible to settle it in an informal way.

5) Identify corrective actions and the timeline for the supplier to implement them if the complaint has been investigated and confirmed as essential.

Note. If corrective actions cannot be identified and/or implemented, acceptance of the relevant wood from this supplier shall be discontinued. If an essential complaint is not settled informally within fourteen (14) days from the receipt date, the information on such complaint shall be sent to the certification body and FSC Russia National Office with enclosed report containing information on actions to be taken by the company to settle the complaint as well as information on applicable precautionary approach.

6) Audit implementation of corrective actions (specified in paragraph 5). If the supplier fails to implement corrective actions, the contract with such supplier shall be terminated.

7) Inform the applicant, certification body and FSC Russia National Office about the outcome of the complaint investigation and actions taken to solve the issue.

8) Record all actions taken in the relevant logbook.

3. Control measures to mitigate risks

The control measures specified below shall be applied prior to controlled wood delivery pursuant to FSC-STD-40-005 (V3-1) standard outlining requirements for sourcing of FSC-controlled wood.

3.1. Control measures to be applied when collecting and analyzing information on suppliers, controlled wood sources and supply chains.

3.1.1. The list of documents requested before signing a contract with a non-certified supplier.

Prior to signing a contract (extension of the existing contracts) with a supplier, such supplier shall submit the certified copies of the following documents:

- Certificate of State Registration;
- Certificate of Re-registration (for companies registered before 2002);
- Taxpayer Registration Certificate;
- Memorandum of Association (if any);
- Articles of Association;
- Minutes on appointment/election of the sole executive body of the contractor;
- An extract from the Unified State Register of Legal Entities made as at the date no earlier than 1 (one) month before the proposed contract signing date;
- Power of attorney to sign contracts (notarized copy or the original document);

- A statement confirming that there are no outstanding lease payments for timberland utilization (submitted by the timberland lessee);
- OHS documents (Limited Liability Companies and Joint Stock Companies shall submit a copy of a regulatory document on *Occupational Health and Safety Management Systems* developed in accordance with the requirements of Federal Law (FZ) No 197 and/or a copy of the order on appointment of a person responsible for OHS scope, a competency evaluation report, a safety induction logbook (the first page and the last filled page), PPE cards (chosen at random), OHS competency assessment certificates (chosen at random). Private and individual entrepreneurs shall submit a copy of a competency evaluation report and filled PPE cards (at least 2).

Check judicial materials for the instances of violation of the forest management practices determined for SPNA, other protective forests and specially protected areas, as well as for the instances of eradication of the specimens and destruction of established habitats of the species included in the Red Lists of Threatened Species of the Russian Federation or its constituent entities.

The contracting procedure is set forth in Ilim Group's Unified Standard for Contractual and Legal Work.

Note. Suppliers shall be aware of high conservation values located within the timberlands they lease. The contract shall contain information on the compartments from which controlled wood shall not be accepted. If new permits are issued under exiting supply contracts, the relevant suppliers shall be further notified of high conservation values available within the timberlands they lease.

3.1.2. Inclusion of additional requirements in the contracts for purchase of controlled wood from non-certified suppliers.

1) Additional requirements for the content of a contract signed with a non-certified supplier entail the following obligations for such supplier:

- Prior to delivery of products, the Supplier shall submit the Supplier Declaration with enclosed copies of the following documents: (a) supply contracts or screenshots from USAIS (if any sub-suppliers are engaged), (b) contractor agreements (if contractors are engaged in harvesting operations), (c) documents confirming that timberland lessees and contractors engaged in harvesting operations have an occupational health and safety management system in place, (d) agreements for sale and purchase of forest plantations and valid forest declarations as regards timberland lease agreements.
- The Supplier Declaration shall contain information on:
 - valid timberland lease agreements and agreements for sale and purchase of forest plantations (except for agreements involving sales and purchase of forest plantations for own needs) or forest declarations relative to timberland lease agreements,
 - documents that serve as a basis for continued supply of harvested wood from intermediate landings,
 - location of intermediate landings of wood supplied under a contract (if any), information on the owner of wood stored at such landings with indication of wood inventory at each landing prior to start of wood deliveries under such contract (information on intermediate landings may not be included in the Supplier Declaration if data on suppliers' intermediate landings is collected in a different way),
 - contracts for slab wood purchase (for chip suppliers).

2) The supplier shall submit new Declarations no later than 20 days after: (a) issuance of new permits that serve as a basis for the supplier and its sub-suppliers (if any) to harvest wood to be supplied, signing of timberland lease agreements and drawing-up of the relevant forest declarations thereto, signing of agreement for sale and purchase of forest plantations and (b) changes in the number of intermediate landings. The documents shall be submitted prior to start of wood deliveries under new permits.

3) Suppliers/sub-suppliers shall allow the representatives of Ilim Group, certification body and ASI to conduct audits to verify compliance with the Declaration, review original documents, inspect cutting blocks and warehouses of suppliers and their sub-suppliers, interview employees, including the employees engaged in wood harvesting and transportation and (or) operations performed in the cutting area.

4) Ilim Group is entitled to refuse to accept roundwood if the above requirements (specified in paragraphs 1-3) are violated.

3.1.3. Control over Declarations submitted by non-certified suppliers, supply agreements and wood harvesting permits.

Supplier Declarations with enclosed copies of the agreements with sub-suppliers and wood harvesting permits are used to:

- verify that all submitted documents have been properly drawn up and ensure traceability of wood supply chains through intermediate landings up to the relevant cutting block;

Intermediate landings are permanently operating warehouses where wood than is being delivered from a cutting block (forest landings) to Ilim Group's warehouses is handled and stored. At such intermediate landings, the wood batches specified in the Supplier Declaration may be mixed with other wood batches (harvested at other cutting blocks) that are not specified in the Supplier Declaration.

- prepare and maintain a register of contracts for supply of wood and harvesting of CTL that fall under controlled wood category (hereinafter, Supply chain register),
- verify that the volume of roundwood supplied under the contract with the relevant supplier does not exceed declared wood harvesting volumes (by wood species),
- verify that both the supplier and the buyer have uploaded all agreements (transactions) specified in Supplier Declarations to the Uniform State Automated Information System for wood tracking and wood transactions (hereinafter, USAIS).
- As to suppliers of chips (including sawing waste), verify that all wood transactions uploaded to USAIS and the origins of wood that may be sourced entail low risk.

A decision regarding contracting a supplier is made based on a positive outcome of the audit of the above documents, completed risk assessment and implementation of control measures with regard to all NRA 1-1 categories (Table 3) specified in paragraphs 3.2. - 3.3.

Once the contract is signed, the information on this contract is included in the Contract register that is maintained at each Branch of Ilim Group.

3.2. Control measures to mitigate origin risks with regard to all NRA 1-1 categories (to be applied for new suppliers and wood origins)

Control measures have been developed in accordance with NRA 1-1. No control measures have been developed for indicators entailing low risks.

Table 3

Control measures to mitigate risks

Category 1. Illegally harvested wood		
A set of international indicators has been developed in such a way that if all these indicators are met, the risk of violations under Category 1 is considered as low (i.e. there is no breach of the legislation related to wood harvesting operations).		
Indicator	Control measures (CM)	Supply areas

<p>1.2 Concession licenses</p>	<ol style="list-style-type: none"> 1. Verify availability of a lease agreement, an agreement for sale and purchase of forest plantations and a contract for performance of work that have been signed in accordance with the established procedure or a document confirming transfer of the right to utilize a timberland on a permanent (for an indefinite period) or free-of-charge basis. Verify whether these documents have been uploaded to USAIS to confirm compliance with the relevant legislation. 2. Add additional requirements to the contracts for sourcing of controlled wood from non-certified suppliers. 3. Control Declarations submitted by non-certified suppliers, supply agreements and wood harvesting permits. <p>Outcome of the implemented control measures:</p> <p>Wood is purchased only subject to availability of the required documentation.</p>	<p>All supply areas</p>
<p>1.4 Wood harvesting permits</p>	<ol style="list-style-type: none"> 1. Verify availability of a forest development plan supported by a positive state expert review opinion, 2. Verify availability of forest declarations drawn up on the basis of timberland lease agreements or agreements for permanent (for an indefinite period) or free-of charge utilization of a timberland; OR 3. Verify availability of the relevant agreements for sale and purchase of forest plantations that have been signed in accordance with the established procedure if wood is harvested under sale and purchase agreements, OR 4. Verify availability of contracts for performance of work relative to forest protection and reforestation that have been signed in accordance with the established procedure. <p>Outcome of the implemented control measures:</p> <p>Wood is purchased only subject to availability of the properly drawn up documents that confirm the right to harvest wood. If there are no such documents, the relevant wood shall not be used.</p>	<p>All supply areas</p>
<p>1.5 Payment of royalties and harvesting fees</p>	<ol style="list-style-type: none"> 1. When signing a contract and subsequently on a regular basis but no less than once per year, verify that a forest management company has no outstanding payments under its timberland lease agreements using Rosleskhoz website (http://rosleshoz.gov.ru/activity/economy_and_finance/stat), official websites of the regional executive bodies authorized to regulate forest-related arrangements or other information sources. <p>If an outstanding payment is confirmed:</p> <ol style="list-style-type: none"> 2. Request the supplier to present the relevant documents (payment documents that confirm payment of rental fees within the timeline specified in the relevant lease agreement, signed reconciliation reports, documents confirming signing of amicable agreements, provision of deferrals as regards outstanding payments, availability of an approved procedure for payment of an outstanding amount. <p>If the amount of rental fee is the subject of a dispute:</p> <ol style="list-style-type: none"> 3. Request the supplier to present the relevant documents confirming the existence of a reasonable dispute regarding the rental fee amount (correspondence, representations accepted by the court, judicial awards) and to communicate a reasonable timeline during which this issue is expected to be settled. <p>Outcome of the implemented control measures:</p> <p>Wood is sourced from a supplier provided that this supplier has no outstanding lease payments. If outstanding payments exist, the supplier shall present a documentary evidence of its right to pay rental fees (and</p>	<p>All supply areas</p>

	other forest-related payments) in installments as well as documentary evidence of compliance with the installment payment schedule.	
1.8. Wood harvesting regulations	<p>1. When performing a field audit:</p> <p>1.1. Verify compliance with the requirements for wood harvesting and forest tending procedures as well as with sanitary rules relative to harvesting operations (paragraph 3.4. hereof).</p> <p>1.2. Visit cutting blocks to confirm compliance with:</p> <ul style="list-style-type: none"> • technologies and requirements specified in process charts; • wood harvesting timeframe specified in a process chart and/or in a harvesting site inspection report, as well as compliance with the forest declaration validity period. <p>1.3. During a field audit conduct a random check of forest management reports and acceptance certificates for the work involving thinning operations and salvage cuttings.</p> <p>2. Obtain a documentary evidence of the legality of clear salvage cuttings at Roslekshoz website.</p> <p>If supplied wood has been harvested as a result of salvage cutting:</p> <p>3. Check the approved reports on the harvesting site pathology survey to make sure that wood is accepted only if it has been harvested as a result of cutting of damaged trees and forest stands that appear to be a source of harmful organisms.</p> <p>Outcome of the implemented control measures:</p> <p>A confirmation that sourced wood is harvested in accordance with the requirements of the relevant legislation.</p>	All supply areas
1.9. Protected areas and species	<p>1. During a field audit check forest declarations and sale and purchase agreements for compliance with the forest management practices determined for protective forests and specially protected areas.</p> <p>2. <u>Check maps available at http://hcvf.ru/</u>, in the corporate Forest GIS, at <u>http://oopt.aari.ru/</u>, as well as check the Forest Plan of a constituent entity of the Russian Federation, forest management rules of procedure and an area planning diagram for existing or planned SPNA that are located within harvesting sites and which boundaries are described in a way allowing to unambiguously identify location of such SPNA vs. boundaries of the area covered by the forest management efforts (forestries, forest compartments, etc.).</p> <p>If existing or planned SPNA are located within harvesting sites:</p> <ul style="list-style-type: none"> • based on available documents make sure that the forest management practices determined for existing SPNA and specified in the approved SPNA regulations/data sheets are maintained or make sure that the forest management practices to be implemented for a planned SPNA are maintained if such practices are specified in the documentation for such planned SPNA, forest management rules of procedure or area planning diagram; • make sure that forest management practices determined for planned SPNA have been approved by the relevant executive authorities of a constituent entity of the Russian Federation authorized to address issues relative to environment protection; • refuse to source wood from this area if the procedure for assessment of wood mixing risks performed as per paragraph 3.4 revealed violations of determined/planned forest management practices. • ban supply of wood if it is not possible to mitigate the risk of wood mixing. 	All supply areas

	<p>3. Verify shipping documents for the wood supplied to the company site to confirm that the species banned for harvesting are not included in the supply scope.</p> <p>4. In the course of field audits, check harvesting site inspection report and forest management reports (1-IL) to confirm that there are no species banned for harvesting.</p> <p>5. If wood harvested during salvage cuttings is supplied, see par.5 of Indicator 1.8.regarding wood harvesting regulations.</p> <p>Outcome of the implemented control measures.</p> <p>A confirmation that the supply scope does not include any wood from SPNA as well as a confirmation that wood supply is arranged in compliance with the approved forest management practices determined for SPNA.</p>	
1.10 Environmental requirements	<p>When conducting field audits (in accordance with the schedule) at harvesting sites, verify compliance with the requirements specified in environmental regulations as regards disposal of household and industrial wastes in forests, O&L pollution.</p> <p>Outcome of the implemented control measures:</p> <p>A confirmation that sourced wood is harvested in accordance with the requirements of the relevant legislation.</p>	All supply areas
1.10.a. Requirements for wood from the areas contaminated with radionuclides	<p>1. Check the forest management rules of procedure applied by forestries as well as forest plans of constituent entities of the Russian Federation for information on compartments where wood is harvested to confirm that harvesting site is not contaminated with radionuclides.</p> <p>If there is no such information in the forest management rules of procedure applied by forestries as well as in the forest plans of constituent entities of the Russian Federation:</p> <p>2. send a request to the relevant forestry to confirm that wood is harvested in the area that is not contaminated with radionuclides.</p> <p>If harvesting operations were performed in the area contaminated with radionuclides:</p> <p>3. send a request to the relevant forestry to confirm that logging was performed in accordance with Order of the Ministry of Natural Resources and Environment of the Russian Federation No 283 of June 08, 2017.</p> <p>Outcome of the implemented control measures:</p> <p>A confirmation that sourced wood is not harvested in the area contaminated with radionuclides.</p>	Kransoyarsk Territory, Kransnoyarskoye, Emelyanovskoye and Sukhobuzinskoye forestries.

<p>1.11 Health and safety</p>	<p>1. When conducting field audits, check compliance with OHS requirements relative to harvesting operations and wood transportation from logging sites and intermediate landings, including compliance with proper conditions of work/rest, availability and operability of PPE, compliance with safety rules, compliance with technological requirements specified in the relevant process charts and relative to safety of the work performed. The following documentary evidence conforming compliance with these requirements are available:</p> <ul style="list-style-type: none"> • order on appointment of a person responsible for OHS scope, • OHS certificates, • OHS manuals, • Safety briefing logbooks, • documents confirming provision of necessary PPE for the employees, • OHS trainings, • special assessment of working conditions. <p>Outcome of the implemented control measures:</p> <p>Confirmation that sourced wood is harvested in compliance with OHS requirements.</p> <p>Implementation of corrective actions in a timely manner to eliminate violations of OHS requirements.</p>	<p>All supply areas</p>
<p>1.12 Health and safety</p>	<p>When conducting a field audit</p> <ol style="list-style-type: none"> 1. Randomly check availability of employment contracts signed between employers and employees in accordance with the established procedure. 2. Verify that the subject matter of employment contracts signed between employers and employees complies with the requirements of article 57 of the Russian Labor Code and the periods of such contracts have been determined with due regard for requirements specified in articles 58 and 59 of the Russian Labor Code. 3. Interview employees regarding availability of employment contracts and compliance with the requirements set forth in the Russian Labor Code. Make sure that employees have no complaints. 4. Interview (also during consultations) stakeholders (heads of local settlements, municipal entities, etc.) to make sure that there are no instances of violation of the Russian labor laws by suppliers. <p>Outcome of the implemented control measures:</p> <p>A confirmation that sourced wood is harvested in accordance with the requirements of labor laws.</p>	<p>All supply areas</p>
<p>1.15 Rights of indigenous peoples</p>	<ol style="list-style-type: none"> 1. Implement control measures attributable to Indicator 2.3 to mitigate risks. 2. Verify that mass media, publications and judicial materials do not contain any information on violations of indigenous peoples' rights (within harvesting areas). 3. In the course of field audits and consultations with stakeholders, interview representatives of indigenous peoples, local administration, non-governmental organizations, etc. to find out if there are bitter disputes relating to harvesting operations performed in this area and respect for indigenous peoples' rights. <p>If violations of indigenous peoples' rights are identified:</p> <ol style="list-style-type: none"> 4. Take actions to settle disputes. <p>If dispute settlement is not possible:</p> <ol style="list-style-type: none"> 5. Refuse to purchase wood. 	<p>Supply areas specified in Annex 3.1 to NRA 1-1</p>

	<p>Outcome of the implemented control measures: A confirmation that sourced wood is harvested without any violations of laws as regards the rights of indigenous peoples.</p>	
<i>1.17 Trade and transport</i>	<p>1. Check if the relevant transaction has been registered in USAIS 2. During field audit, check shipping documents for wood transported by road vehicle.</p> <p>Outcome of the implemented control measures: A confirmation of the trade operation legality and compliance with laws.</p>	All supply areas
<i>1.20 CITES</i>	No control measures are required, as such wood species are not purchased as well as no wood is sourced from the specified regions.	supply areas do not fall under CITES requirements
Category 2. Wood harvested in violation of traditional and civil rights		
Indicator	Control measures (CM)	Supply areas
<i>2.2. The rights of employees are respected, including the rights set forth in ILO key principles</i>		
<i>2.2.a. Right to self-organization and collective bargaining</i>	<p>1. Send a request to a trade union or interview its representative to confirm that trade union rights are respected (if a trade union exist in the company). 2. During field audits, interview the harvesting companies' employees to make sure that the company management does not prevent its employees from exercising their right to self-organization.</p> <p>Outcome of the implemented control measures: No violations of the right to self-organization and collective bargaining have been identified.</p>	All supply areas
<i>2.2.b. Forced labor</i>	<p>If it is identified that wood is supplied by a correctional center:</p> <p>1. Send a formal request to the territorial public oversight commission on human rights in penitentiaries. 2. If the commission on human rights in penitentiaries confirms violation of human rights: a. Refuse to purchase wood, OR b. Request the management of the relevant correctional center to present explanations/documentation to clarify the situation relative to violations of human rights, OR c. Conduct a field audit to obtain additional information and clarify the situation relative to violations of human rights.</p> <p>Outcome of the implemented control measures: A confirmation that the prisoners' rights are not violated during harvesting and a confirmation of voluntary consent of prisoners to be involved in harvesting operations.</p>	Supply areas where wood is supplied by institutions of the Federal Penitentiary Service
<i>2.2.d. Gender discrimination</i>	<p>1. During field audits, interview HR specialists, company employees (women), representatives of a team to confirm that there is no gender discrimination and violation of women's rights.</p> <p>Outcome of the implemented control measures: No identified instances of gender discrimination.</p>	All supply areas
<i>2.2.e. Racial (national origin) discrimination</i>	<p>1. When conducting field audits, interview HR specialists to find out if there are migrants among the company's employees.</p> <p>If the company has migrant workers:</p>	All supply areas

	<p>2. Interview the company's employees (migrants) and representatives of the team to find out whether labor rights are duly respected.</p> <p>Outcome of the control measures:</p> <p>A confirmation that all labor rights of migrants are respected same as labor rights of other employees.</p>	
<p>2.3. Rights of indigenous and traditional peoples are respected</p>	<p>If it is identified that wood is sourced from the areas where indigenous and traditional peoples live:</p> <ol style="list-style-type: none"> 1. Verify that information available in mass media, publications and judicial materials do not contain any evidence of violations of indigenous and traditional peoples' rights. 2. Interview representatives of indigenous peoples, local authorities (at settlement/community level), non-governmental organizations to find out whether there are bitter disputes relating to harvesting operations in this area and whether indigenous people's rights are respected. <p>Outcome of the implemented control measures:</p> <p>A confirmation that rights of indigenous and traditional peoples are not violated.</p>	<p>Supply areas specified in Annex 3.1. NRA 1-1</p>
<p>Category 3. Wood from forests in which high conservation values are threatened by management activities</p>		
<p>3.1. HCV1 Diversity of species</p>	<p>HCV1 include wetlands, Important Bird Areas (IBAs) and other ecosystems with a high level of biodiversity and important animal habitats as well as Altai-Sayany global center of plant diversity which comprises south forestries of the Krasnoyarsk Territory such as Novoselovskoye, Dauriskoye, Manskoye, Verkhnemanskoye, Sayanskoye and Irbeiskoye forestries as well as forestries located to the south of the above mentioned.</p> <ol style="list-style-type: none"> 1. Using maps available at http://www.hcvf.ru/ or in the corporate Forest GIS, verify that there are no harvesting areas within HCV1 boundaries. 2. If harvesting area boundaries overlap HCV1 boundaries: <ol style="list-style-type: none"> a. based on available documentation make sure that harvesting operations are performed in compliance with the forest management practices determined for SPNA or specially protected areas by the relevant legislation, OR b. make sure that forest management practices have been approved by the relevant stakeholder (based on the stakeholder list broken down by HCV that is available at FSC Russia website) if the relevant legislation has not determined it as forest management practices for SPNA or specially protected areas, OR c. Refuse to purchase wood. <p>Outcome of the implemented control measures:</p> <p>A confirmation that wood is not sourced from wetlands, IBA. Global Centers of Plant Diversity and IFL and that wood supply is arranged in accordance with the forest management practices approved by stakeholders or set forth by the relevant legislation.</p>	<p>All supply areas that have HCV1</p>
<p>3.2. HCV2 Large natural landscapes</p>		
<p>3.2.a. IFL</p>	<ol style="list-style-type: none"> 1. Using maps available at http://www.hcvf.ru/ or in the corporate Forest GIS, verify that there are no harvesting areas within IFL boundaries. 2. If harvesting area boundaries overlap IFL boundaries: <ol style="list-style-type: none"> a. make sure that forest management practices have been approved by the relevant stakeholder (based on the stakeholder list broken down by HCV that is available at FSC Russia website) 	<p>All supply areas (forestries that have IFL)</p>

	<ul style="list-style-type: none"> b. Using USAIS website, check supply chains specified in Declarations for possibilities of wood supply from IFL as well as for the risk of mixing with wood from IFL. c. If wood is supplied directly from the cutting blocks located within leased timberlands that contain IFL, ensure documentary evidence that no wood is sourced from IFL using the system applied at the Branch (waybill and/or a shipping document and/or verification using GPS data/ cutting block encoding based on forest declaration data, etc.) d. If there are risks of wood mixing, conduct a field audit and/or check source documents. e. Refuse to purchase wood if it is not possible to eliminate the risk of wood mixing. <p>Outcome of the implemented control measures:</p> <p>A confirmation that no wood is sourced from IFL and wood supply is arranged in accordance with the forest management practices approved by stakeholders or set forth by the relevant legislation.</p>	
<p>3.2.b. Other HCV2 (intact forest areas)</p>	<ul style="list-style-type: none"> 1. Using maps available at http://www.hcvf.ru or in the corporate Forest GIS, verify that there are no harvesting areas within the boundaries of intact forest areas. 2. If harvesting area boundaries overlap the boundaries of intact forest areas: <ul style="list-style-type: none"> a. make sure that harvesting operations are performed in compliance with the forest management practices (SPNA or specially protected areas) set forth by the relevant legislation, OR b. make sure that forest management practices have been approved by the relevant stakeholder (based on the stakeholder list broken down by HCV that is available at FSC Russia website) if the relevant legislation has not determined it as forest management practices for SPNA or specially protected areas. c. Using USAIS website, check supply chains specified in Declarations for possibilities of wood supply from intact forest areas as well as for the risk of mixing with wood from intact forest areas. d. If wood is supplied directly from the cutting blocks located within leased timberlands that contain intact forest areas, ensure documentary evidence that no wood is sourced from such intact forest areas using the system applied at the Branch (waybill and/or a shipping document and/or verification using GPS data/ cutting block encoding based on forest declaration data, etc.). e. If there are risks of wood mixing, conduct a field audit and/or check source documents. f. Refuse to purchase wood if it is not possible to eliminate the risk of wood mixing. <p>Outcome of the implemented control measures.</p> <p>A confirmation that no wood is sourced from intact forest areas and that wood supply is arranged in accordance with the forest management practices approved by stakeholders or set forth by the relevant legislation.</p>	<p>Supply areas - Vologda Oblast (forestries that have intact forest areas)</p>
<p>3.3. HCV3 Rare and endangered ecosystems</p>	<p>Ilim Group considers the following ecosystems as rare:</p> <p><u>a) According to website http://www.hcvf.ru/</u></p> <p>In the Arkhangelsk and Vologda Oblasts and in the Republic of Komi:</p> <ul style="list-style-type: none"> - old-growth south boreal intact spruce-fir forests with nemoral elements (wood stand contains any share of fir trees), <p>In addition, in the Arkhangelsk and Vologda Oblasts:</p> <ul style="list-style-type: none"> - larch-dominated forests (wood stand contains a dominant share of larch). - old-growth dry pine forests - areas containing natural alluvial ecosystems, woodlands situated near the mouth of a river. <p>In addition, in the Vologda Oblast:</p>	

	<p>- coniferous and broadleaved woodlands, spruce-fir- linden woodlands as well as spruce-fir woodlands with wood stand containing linden trees (regardless young stand) and at least 6 species of spruce and fir, broadleaved woodlands with four and more broadleaved species (oak, beech, linden, elm, Norway maple, common maple, sycamore maple) that are simultaneously present in the wood stand.</p> <p><u>c) According to Annex 3.2. to NRA</u> In the Kostroma and Kirov Oblasts: spruce-fir-linden woodlands as well as spruce-fir woodlands with linden trees present in the wood stand (regardless young stands), - oak woodlands (wood stand contains three and more oak species). In addition, in the Kostroma and Nizhny Novgorod Oblasts: -polydominant broadleaved woodland.</p> <ol style="list-style-type: none"> 1. Verify that there are no HCV3 within harvesting sites using maps available at http://hcvf.ru or in corporate Forest GIS as regards the category under item (a) and using data specified in forest declarations and/or sale and purchase agreements as regards category under item (c). 2. If rare ecosystems are identified within harvesting sites, re-conciliate species mix at each cutting block based on data specified in the relevant forest declaration or in the agreement for sale and purchase of forest plantations which contain rare ecosystems: 3. If harvesting area boundaries overlap HCV3 boundaries: <ol style="list-style-type: none"> a. If the forest management practices has been determined as SPNA or a specially protected area by the relevant legislation, agree such forest management practices with the relevant stakeholder (based on the stakeholder list broken down by HCV that is available at FSC Russia website). b. Refuse to purchase wood, if wood harvested at a cutting block contains rare ecosystems and if forest management practices have not been agreed by stakeholders. 4. If cruising descriptions do not confirm HCV3 boundaries, notify the developer of http://www.hcvf.ru/ accordingly to correct website data. <p>Outcome of the implemented control measures.</p> <p>A confirmation that no wood is sourced from the area that contains rare ecosystems.</p>	
<p>3.4. HCV4 Critical ecosystem services</p>	<p>HCV4 include protective forests and forests located in the water protection zone.</p> <ol style="list-style-type: none"> 1. Arrange consultations with forest management bodies as well as with bodies responsible for environment protection and forestries to make sure that the supplier does not violate the forest practices determined for management of protective forests and specially protected areas. <p>Outcome of the implemented control measures.</p> <p>A confirmation that there the rules established with regard to protective forests and specially protected areas are not violated.</p>	<p>All supply areas</p>
<p>3.5. HCV5 Community needs</p> <p>3.6. HCV6 Cultural values</p>	<ol style="list-style-type: none"> 1. Check on maps available at http://hcvf.ru the position of the boundaries of HCV5 and 6 vs. harvesting sites; 2. If harvesting area boundaries overlap HCV boundaries: <ol style="list-style-type: none"> a. Make sure that forest management practices have been agreed by the relevant stakeholders, OR b. Refuse to purchase wood. 3. During a field audit, interview representatives of the local authorities (authorities of rural communities) regarding HCV5 and 6. <p>If there is a conflict with stakeholders relating to HCV5 and 6:</p>	<p>All supply areas</p>

	<p>4. Make sure that a harvesting company and the relevant stakeholders have taken steps to establish forest management practices for HCV 5 and 6 that stakeholders consider as fair and equitable in order to settle the conflict.</p> <p>5. Forest management practices for HCV6 and 5 agreed between a harvesting company and the relevant stakeholders shall serve as a proof that the conflict has been settled.</p> <p>Outcome of the implemented control measures.</p> <p>A confirmation that HCV5 and 6 are not threatened as well as that there are no violations relative to preservation of these high conservation values.</p>	
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Scope of the control measures specified in Table 3

Supply category	Scope of the control measures aimed to mitigate origin risks
<p>1. Direct deliveries of wood to the company locations by road vehicle from timberlands leased by a supplier or its sub-suppliers as well as deliveries of wood harvested under agreements for sale and purchase of forest plantations.</p> <p>2. Deliveries by raft with wood transported to bundling points only from the timberlands leased by a suppliers or its sub-suppliers as well as deliveries of wood harvested under agreements for sale and purchase of forest plantations.</p>	<p>Harvesting sites specified only in the Supplier Declaration</p>
<p>3. Wood deliveries through:</p> <ul style="list-style-type: none"> – intermediate landings; – chip suppliers’ warehouses, including warehouses of sawmill waste generated during wood processing; – railway warehouses with involvement of traders. 	<p>All wood origins identified in USAIS with regard to evaluated supplier</p>

3.3. Control measures to mitigate risks related to mixing with wood from unacceptable sources

3.3.1. As regards wood supply, the risk of wood mixing in the supply chain is considered as specified.

Table 4

Control measures to mitigate risks of wood mixing

Supply category	Control measures
<p>1. Direct deliveries of pulpwood by road vehicle to the company locations from timberlands leased by a supplier or its sub-suppliers as well as from cutting blocks under agreements for sale and purchase of forest plantations with origin risk considered as low.</p>	<p>Random field audits in accordance with item a) of paragraph 3.4.1. of DDS</p>

<p>2. Deliveries by of pulpwood by rafts with wood transported to bundling points only from the timberlands leased by a supplier or its sub-suppliers as well as from cutting blocks under agreements for sale and purchase of forest plantations with origin risk considered as low.</p>	
<p>3. Pulpwood supply through:</p> <ul style="list-style-type: none"> – intermediate landings; – railway warehouses with involvement of traders. <p><i>All wood origins in all supply chains of the supplier have been considered as entailing low risk of origin (with due regard for USAIS)</i></p>	
<p>4. Pulpwood supply through:</p> <ul style="list-style-type: none"> – intermediate landings; – railway warehouses with involvement of traders. <p><i>Not all wood origins in all supply chains of the supplier have been considered as entailing low risk of origin (with due regard for USAIS)</i></p>	<p>Verification of documents in accordance with par.3.3.2. of DDS. Random field audits in accordance with item a) of paragraph 3.4.1 of DDS and unscheduled field audits as per par. 3.4.4 of DDS</p>
<p>5. Chip supplies through chip suppliers' warehouses, including warehouses of sawmill waste generated during wood processing;</p> <p><i>All wood origins in all supply chains of the supplier have been considered as entailing low risk of origin (with due regard for USAIS)</i></p>	<p>Random field audits in accordance with item b) of paragraph 3.4.1. of DDS</p>
<p>6. Chip supplies through chip suppliers' warehouses, including warehouses of sawmill waste generated during wood processing;</p> <p><i>Not all wood origins in all supply chains of the supplier have been considered as entailing low risk of origin (with due regard for USAIS)</i></p>	<p>Verification of documents in accordance with par.3.3.2. of DDS. Random field audits in accordance with item c) of paragraph 3.4.1 of DDS and unscheduled field audits according to paragraph 3.4. 4. Of DDS</p>

3.3.2. When auditing documents, one or several of the following facts may be considered as a documentary evidence that there is no risk of wood mixing:

- the supplier has own DDS that ensures tracing of wood flows;
- the supplier has a GPS-based system for tracing deliveries;
- the supplier keeps relevant logbooks (keep records in electronic systems) that contain records regarding acceptance, storage, shipment and consumption of wood during production process, chip inventory, etc.

3.3.3. The risk of controlled wood mixing with wood from unacceptable sources will be mitigated as a result of implementation of the above control measures.

3.4. Control measures taken during random and unscheduled field audits of controlled wood supplies

3.4.1. Random field audits of controlled wood supplies are carried out annually in accordance with the schedule, and include:

a) suppliers of pulpwood $N = \sqrt{y}$, where N is the number of random audits (rounded upwards to the whole number), y is a total number of permits (agreement for sale and purchase of forest plantations, lease agreements) for supply (confirmed by desktop/field audits);

b) chip suppliers indicated in p. 5 of table 4 (in accordance with p. 3.3.1.) for 30% of sampled suppliers (field audit of at least one chain)

b) chip suppliers indicated in p. 6 of table 4 (in accordance with p. 3.3.1.) for 100% of sampled suppliers (field audit of all chains where the origin risk is qualified as not low).

3.4.2. Field audits of new suppliers

When signing a contract with a new supplier, such supplier undergoes a procedure for assessment of the origin risk in accordance with p. 3.1 and 3.2 of DDS, and assessment of the risk of wood mixing in accordance with p. 3.3.1 The total number of field audits under pp. (3.4.1) is determined considering new suppliers. Random field audits of controlled wood supplies mean control measures with the following actions taken:

- for pulpwood suppliers: visits to cutting blocks (at least one) and intermediate landings, reading of documents, employee surveys in the companies participating in supply chains, consultations with stakeholders;
- for chip suppliers: visits to chip (lumber) production area, cutting blocks and intermediate landings, reading of documents, employee surveys in the companies participating in supply chains, consultations with stakeholders;

3.4.3. The following may results from implementation of control measures during field audits of suppliers and sub-suppliers of controlled wood:

- confirmation of supplier and sub-supplier obligations included in the additional requirements of the contracts with suppliers and Supplier Declaration, or
- identification of non-conformities to be remediated within the agreed period; or
- identification of irremediable non-conformities and making decisions by Ilim Forests to stop acceptance of wood under contracts with suppliers.

3.4.4. Unscheduled field audits of controlled wood are carried out if the requirement violation risk is identified for all categories, on the following conditions:

- in accordance with the audit results (field audits, internal/external audits, etc.) identified significant non-conformities of the suppliers (which may lead to non-conformities of Ilim Group) for the previous year;
- in case of identified risk of wood mixing, documented control measures do not allow to mitigate it.

4. Participation of stakeholders in field audits of controlled wood supplies

4.1. Notifications of random and unscheduled field audits of controlled wood supplies shall be sent to the regional administration and forestry where the audited timberlands are located.

During the audit negotiations should be held (possibly by phone) with the representatives of the administration and forestry regarding compliance with the requirements for controlled wood. The negotiation results shall be recorded in the log or otherwise and kept for 5 years.

As may be agreed by the parties, stakeholders sending their comments under DDS may participate in the field audits of controlled wood supplies.

5. Control measures during the contract implementation

5.1. Making and maintaining the Register of supply chains providing for supply of wood and cutting of roundwood of controlled wood category (CW)

Data on the chains of contracts for supply of wood and cutting of roundwood by non-certified suppliers is included by Ilim Group in the Supply Chain Register. In case the supply chains include certified sub-suppliers, such sub-suppliers will be included in the Supply Chain Register, but without the assessment of origin risks. The Supply Chain Register contains information on schedule and actual volumes of supply, as well as on permissible volume of harvesting in accordance with the supply chain permits.

5.2. Control over short log supply volume

5.2.1. The Supplier Declaration in the Supply Chain Register shall confirm that the scheduled volume of short log supply does not exceed the permissible harvesting volume in accordance with the supply chain permits.

5.2.2. Information on permits for harvesting are kept in the Supply Chain Register after the expiry of their validity for the period of harvested short logs storage at the supplier (sub-supplier) warehouses due to road and waterway condition.

5.3. Wood acceptance control

5.3.1. All wood (timber and chips) shall go through the acceptance points where the volume of supplied wood is determined.

5.3.2. Acceptance of wood shall be made by the acceptance inspector only against shipping documents (supporting documents for wood transportation and waybills/shipping specification), made by the supplier, included in the Contract Register valid as at the date of the acceptance. In case the supporting documents do not confirm with the Supply Chain Register data, wood shall not be accepted.

5.3.3. Information systems (GPS, Avtograf, Avtoskop, GLONASS, Forest GIS) may be used to check the wood origin.

6. Control measure. Internal and external audits

- Internal audits of DDS in accordance with the FSC procedures are carried out on an annual basis.
- The applicable DDS is revised annually if required (NRA amendments, inefficiency of control measures, etc.)
- External audits are carried out annually by the certification body.

7. Interaction between stakeholders

7.1. Lists of stakeholders in Ilim Forests

The lists of stakeholders to comply with the requirements for categories 1-3 of controlled wood include:

Category 1 - economic interests:

- Forestry authorities of the constituent entities of the Russian Federation;
- Logging companies and contractors;
- FSC certificate holders.

Category 2 - social interests:

- Non-profit organizations and local communities interested in social aspects of forest management, harvesting and forest utilization;
- Forest industry and logging site employees;
- Trade unions;
- Indigenous people and traditional people.

Category 3 - environmental interests:

- NGOs involved or with an interest in the environmental aspects of forest management (HCVs 3 and 4).
- Local communities and indigenous people representatives (HCVs 5 and 6).
- FSC-accredited certification bodies active in Russia.
- National and state forest agencies.
- Experts with expertise in category 3 controlled wood.
- Research institutions and universities.
- FSC National Office in Russia.

7.2. Stakeholder notification of DDS development

Identified stakeholders, such as organizations, specialists and people included by Ilim Forests in the List of Stakeholders, shall be invited to participate in the consultation by provision the DDS Summary of Ilim Group by mail/e-mail at least six (6) weeks prior to the activity that is the subject of the consultation.

7.3. Stakeholder consultation regarding DDS Summary

All identified stakeholders (persons who accepted the proposal to participate in the consultation regarding DDS) shall be provided with additional information that is relevant to the consulted issue (excluding information that is considered confidential). Stakeholders shall be asked to provide their consent to the publication of their comments.

7.4. Stakeholder feedback and consultation record regarding DDS Summary

Within sixty (60) days after the end of the consultation period, Ilim Group shall respond to all stakeholders who participated in the consultation process explaining how their comments were taken into account. Information on recording of the consultation and received proposals shall be included in the DDS Summary.

7.5. Consultations with stakeholders carried out as control measures to mitigate the risks

7.5.1. Ilim Group Forests perform consultations with stakeholders as control measures to mitigate the risks in accordance with the DDS.

7.5.2. Ilim Forests shall annually before the control audit, prepare a brief report on consultations with stakeholders to include the following:

- a) Areas which were discussed during the consultations with stakeholders;
- b) List of stakeholders invited to participate in the consultations;
- c) Review of comments received from stakeholders.
- d) Data on recording of proposals received from stakeholders;
- e) Opinion of Ilim Forest with a justification for utilization of wood harvested in the indicated timberlands and its compliance with FSC Controlled Wood category.

Ilim Forests keep the materials of the performed consultations within 5 years, including the List of Stakeholders, received comments and relevant responses.

7.5.3. Ilim Group may provide additional consultations with stakeholders, if required.

8. Participation of experts in development of control measures

Ilim Group engaged the following experts to develop control measures under DDS:

No.	Expert: Full name, position, qualification, contact information	Controlled wood category
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1.	Elena Rai, Assistant Professor, Department of Biology, Ecology and Biotechnology, NAU, FSC Consultant Tel.: 89523081781, E-mail: Elenarai@mail.ru	Category 3
2.	Sergey Slastnikov, Director of Sorvizhi-Les, FSC Consultant Tel.: 89536948377, E-mail: s.slastnikov@yandex.ru	Category 2
4.	Nadezhda Strakhova Pricebatch Altai-UK Ltd. Director International FSC member, Social Chamber Member of the FSC Consulting Group, Controlled Wood (Social Chamber) 2017-2018 E-mail:pbr2016@mail.ru	Category 2

9. Brief report on the results of survey/advice with concerned parties

The DDS survey was conducted by sending the DDS Summary of Ilim Group by e-mail in accordance with the list of stakeholders including:

1. ENGO.
2. Trade Unions.
3. Scientific and educational institutions.
4. Certified companies.
5. Logging companies, suppliers, etc.

Also, the Summary was published on <https://ru.fsc.org/ru-ru/search> so that the certification bodies and other stakeholders may read. The areas where the consultations were provided to the stakeholders, are listed in Table 1 DDS.

The full list of stakeholders participated may be provided upon request. The suggestions received are given below.

Item No.	Stakeholders Full name, contact information	Wording of a proposal	Recorded in DDS
1		It should be determined once whether the Company's wood supply area is included in an ecoregion, and this information should be specified in the DDS - no control measures required. 3.1d (HCV1) "The forest zone is not included in the Center of Plant Diversity (CPD)." The are four such (forest) zones in Russia: Altai-Sayany, Caucasus, Crimea, South of the Far East: no control measures required.	This approach was implemented for all NRA 2 indicators. Therefore, the DDS and its Summary contain only control measures applicable in the specific conditions.
2	Comments and suggestions of N. Shmatkov (WWF) to the DDS of Ilim Group	Some indicators may be removed or it may be mentioned that the relevant risk is low, no control measures required: p. 2.3.b) "There are no confirmed violation of the rights of prisoners of the corrective labour institutions during harvesting". NRA contains references to ILO recommendation to the Government of the Russian Federation regarding the concern with respect to compliance with the requirements of ILO Convention 29. At the same time, the official response of the Government of the Russian Federation to that recommendation states that currently there is no practice for engagement of prisoners for work in private companies. As there are no reasons to distrust	Control measures are amended in DDS.

		this official statement, therefore, no additional control measures are required for this indicator.	
3	Comments and suggestions to DDS of Ilim Group provided by Valeriya Moreva, expert, forest certification group, CISR (Center of Independent Sociological Research), and Maria Tsyachnyuk, CISR	Amendments to the control measures in Sections 2.4, 2.5, 3.1.2, 4, 5 of NRA 2. - Include a term “affected parties”. - Assess risks for current and planned SPNA. - Delete the word “small-numbered” from the definition “indigenous people”, as ILO Convention has a wider definition. - Indicate the entire volume of wood stored at the intermediate landings, - Add “firewood cutting for the needs of people at the leased timberlands”	Recorded in the DDS: Recorded but not everywhere in the DDS. Recorded in the DDS, Recorded in the DDS. Recorded in the DDS. Not recorded, as some disputable issues may arise for compliance with the Russian laws.
4	Konstantin Kobaykov, coordinator of the projects involving high conservation value forests, WWF Russia	Agreed resolutions on category 3 control measures	Recorded in the DDS.

10. Report on audits of suppliers conducted in 2020 (as at February 20, 2021)

Number of conducted audits of suppliers	Data on audit results			The results of remediated deficiencies is the number of deliveries	
	Number of audit reports with identified deficiencies	Number of audit reports with implemented corrective actions	Number of audit reports with implemented corrective actions the period of which is not expired	Terminated/suspended	Not terminated
Koryazhma Forest					
29	29	20	5	6	23
Bratsk Forest					
18	10	9	1	-	18
Ust-Ilimsk Forest					
14	5	5	0	0	14

Koryazhma Forest

Identified deficiencies: some cases of failures to comply with the safety rules (confirmations of conducted safety briefings, medical checkups, trainings, PPE use, assessment of working conditions), requirements for recording of processes (availability of signatures in the process chart), failures to indicate contractor companies in the Supplier Declaration.

The suppliers were provided with the confirming images/scanned copies of documents to confirm the corrective actions, which were accepted to close the deficiencies. Deficiencies under 20 audit reports were closed.

Period for closing was not expired for 5 audit reports. In case of failure to provide materials for closing of deficiencies, the term of the agreement with a contractor will be suspended.

In 2021, 29 audits of suppliers are planned to be carried out (excluding new suppliers)

Bratsk Forest:

The identified deficiencies related to some failures to comply with the safety rules (no special assessment of workplace conditions, training certificates, appointment of responsible persons, no documents for PPE issue), requirements for recording of processes (availability of signatures in the process chart).

The suppliers were provided with the confirming images/scanned copies of documents to confirm the corrective actions, which were accepted to close the deficiencies.

Deficiencies under 9 audit reports were closed. Period for closing was not expired for 1 audit report. No deficiencies were identified under 8 audit reports.

In 2021, 15 field inspection of suppliers are planned to be carried out (excluding new suppliers).

Ust-Ilimsk Forest

The identified deficiencies related to some failures to comply with the safety rules (no special assessment of workplace conditions, no confirmation of conducted safety briefings, accounting of PPE, medical checkups of employees), including those connected with compliance with proper conditions of work/rest (toilets at the camp site), requirements for waste storage area.

The suppliers were provided with the confirming images/scanned copies of documents to confirm the corrective actions, which were accepted to close the deficiencies.

Deficiencies under 10 audit reports were closed. Period for closing was not expired for 1 audit report.

In 2021, 14 field inspection of suppliers are planned to be carried out (excluding new suppliers).

Please send your comments and suggestions regarding DDS to:

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