TIMBER TRADE FEDERATION

CODE OF CONDUCT

INTRODUCTION

The Code of Conduct demonstrates the Timber Trade Federation's commitment to delivering quality and service. Our Members are committed to the highest standards of professionalism and integrity in the conduct of their business.

The Code of Conduct sets out the principles by which Members agree to behave. Members will not knowingly misrepresent facts or mislead any customers or suppliers concerning any aspects of the goods and services they provide. They also agree to abide by specific codes of practice relevant to their business.

Importantly, our Environmental Code of Practice commits TTF Members to the highest standard of environmental practice particularly in relation to the sourcing of wood and wood products.

Our Members are committed to providing clear, responsive and user-friendly procedures to deal with complaints should they arise. If these fail to deal with a given problem, a customer may then initiate a complaint under this Code.

The Disciplinary Procedure also gives the TTF powers to address alleged breaches of the Environmental Code of Practice.

This document sets out the Code in its entirety but should you require any further information then you can call 020 3205 0067.

John White
Chief Executive
Timber Trade Federation

Amended June 2011
Amended June 2007
June 2002

TIMBER TRADE FEDERATION

CODE OF CONDUCT

1. This Code of Conduct ("Code") is intended to assist Members of the Federation to maintain and improve the standards of conduct within the industry by assuring all who deal with Members of the Federation that they are conducting their business with reputable organisations.

2. For the purposes of the Code the expression "Member" shall not include Associate Members as defined in the Articles of Association and bye-laws of the Federation.

3. Otherwise the Code shall be binding on all Members. In the case of existing Members they shall be deemed to have subscribed to the Code by continuing in membership for a period of three months after the coming into effect of the Code. Members joining after the coming into effect of the Code shall signify that they subscribe to the Code by signing the membership application form.

4. All Members shall additionally subscribe to the provisions of the Environmental Code of Practice and the Codes of Practice relevant to their business which currently comprise the:

4.1 Hardwood Code of Practice

4.2 Panel Products Code of Practice

4.3 Softwood Code of Practice

5. It is intended that the Code does not in all cases indicate in precise terms particular action which should or should not be taken but sets out principles which Members are required to apply with good sense, honesty and integrity in the spirit of the Code.

6. Failure to observe the Code or the relevant Code of Practice could lead to the imposition upon the Member by the Federation of fines, suspension from membership or expulsion from the Federation in accordance with the Disciplinary Procedures of the Federation.

7. The Code and/or the Disciplinary Procedure may be amended from time to time with the approval by the membership at an Annual General Meeting.

8. Members shall:

8.1 conduct their businesses lawfully and comply with all relevant legislation and trade fairly and responsibly;

8.2 behave at all times with integrity and act responsibly and with care in the day to day conduct of their business;

8.3 not knowingly misrepresent facts or mislead any customer or supplier concerning any aspect of the goods and services they provide;

8.4 respect confidential information to which they may in the course of business become privy;

8.5 provide adequate training and instruction to their employees and agents bringing the contents and application of this Code and its principles to their attention and requiring such employees and agents to carry out their duties in accordance with the Code;

8.6 follow and comply with any instruction or guidance note or advice (where applicable) issued by the Federation;

8.7 make known and publicise the existence of the Code and where appropriate provide details of the Disciplinary Procedure;

8.8 notify the Federation of any matter which might adversely affect the reputation of the industry or the Federation;

8.9 co-operate fully and in a timely manner to any regulatory or statutory body and to the Federation in the investigation and determination of any complaint made and referred to such body or the Federation;

8.10 provide to all persons with whom the Member does business clear, accurate pre-contractual information and clear terms and conditions of supply including fair contract terms;

8.11 institute in the Members organisation clear, timely, responsive and user-friendly procedures for dealing with complaints and adhere to such procedures and time limits;

8.12 be bound by and comply with the Disciplinary Procedures from time to time.

9. Nothing in this Code restricts or is intended to restrict the rights of a complainant or a Member to pursue remedies through the Courts except where the Member or complainant seeks resolution of the complaint by binding arbitration.

10. The Disciplinary Procedure may not be invoked where the complaint has been the subject of a judicial decision or upon which judicial or arbitration proceedings have been commenced.

11. Members acknowledge and agree that any award fine penalty cost compensation or restitution ("Award") made under the Disciplinary Procedure may be recovered as a debt by the party in whose favour such Award is made.

Amended June 2011
Amended June 2007
June 2002

Timber Trade Federation

TIMBER TRADE FEDERATION

CODE OF CONDUCT

HARDWOOD CODE OF PRACTICE

All Timber Trade Federation (TTF) members dealing in hardwood and associated products are required to adopt and comply with this Code of Practice for use as a public and promotional document forming an integral part of the TTF Code of Conduct.

Its aim is to assist members in the promotion of their company's efforts to correctly supply accurately marked and labelled products and to ensure the exposure of those known to be breaching the code as a result of wilful product mis-labelling or mis-marking.

This code will apply to all hardwood products of any dimension and is binding on all TTF Members dealing in such goods.

1. No Member will deliberately misrepresent any hardwood product offered for sale in terms of species, quality, grade, dimension, measure, moisture content or any other aspect.

2. Where appropriate, every effort will be made to ensure that products supplied will be correctly marked. Any pack or board markings where present must correctly and accurately represent the timber which they refer to in terms of species, quality, dimension and whether or not kiln dried.

3. Where products are offered as made to BS or BS EN standards, or the recognized standards of producing nations, Members will ensure that all the specification requirements of these standards are adhered to. In instances where no contractual reference is made to any specified standard, or specific agreement between the parties, the dimensional tolerances for sawn and processed hardwood will be as per BS EN 1313, Part 2.

4. The conversion to metric measure of hardwood purchased in imperial dimension for sale in the United Kingdom will take account of the requirements given in the National Hardwood Division Metrication Code.

5. No Member shall require any producer or seller to supply any product deliberately mis-marked or unmarked, which may give a false impression of the grade, origin, whether or not kiln dried, or structural grade of the goods in question.

6. No Member will alter or deface any manufacturer's product or packing marks with the intention of misrepresenting the product's grade or description.

7. Structural grade stamps where applied must comply with the marking requirements of BS 5756.

8. In cases where Members believe a breach of the Code of Practice has been committed as a result of product misrepresentation, or where any Member knowingly contravenes any part of the Code it is agreed that the allegation must be reported to the TTF via the TTF Code of Conduct Disciplinary Procedure, and

where appropriate to legal or government authorities. Members will also co-operate fully in any subsequent investigation and any resulting disciplinary proceedings, and abide by its findings.

9. Members undertake to ensure that all relevant personnel employed by them will be conversant with and abide by the appropriate Codes of Practice and their implications.

10. Members undertake to carry out random consignment inspections in respect of both imported and locally purchased products in order to verify that all product markings and descriptions accord with the requirements of the Code of Practice.

Conversion To Metric Measure Of Imperial Timber

Grading Rules

Hardwood timber is produced in the country of origin according to standard sets of grading rules, which not only define the quality of timber but also the standard sizes and measuring tolerances. The table below shows those rules most often applied to timber entering the UK market, the geographical areas in which they are used and whether they define sizes as metric or imperial.

Hardwood Export Standard	Russia	Metric
Malaysian Grading Rules	Far East (Malaysia, Indonesia)	Metric & Imperial
	Australia	Metric & Imperial
NHLA	North & South America	Imperial
	China	Imperial
SATA/FPIB	West Africa	Metric & Imperial
	European	Metric

NB: *There are no European grading rules as such, but a number of EN Standards contain important information on standard sizes, measuring tolerances and qualities. These include:*

BS EN 336	*Structural Timber. Sizes. Permissible Deviations.*
BS EN 1309-1	*Round And Sawn Timber. Method Of Measurement Of Dimensions. Sawn Timber (includes hardwood and softwood, square edged and unedged, excludes tropical timber).*
BS EN 1312	*Round And Sawn Timber. Determination Of The Batch Volume Of Sawn Timber.*
BS EN 1313-2	*Round And Sawn Timber. Permitted Deviations And Preferred Sizes. Hardwood Sawn Timber.*

Timber is graded at a high moisture content in the source region, generally as it is cut from the log. As the timber dries to its end-use dimensions, it will shrink and this loss of

volume may be up to 7%. It is trade practice to sell sawn timber through the UK supply chain and down to the end user based on nett (dry) dimensions after kilning or drying has taken place. The surface roughness of sawn timber and the possibility of dimensional change depending upon relative humidity, means that it is not generally practical to use fractions of millimetres when measuring or converting sawn timber. This fact is recognized in the dimensions and tolerances defined in the above Standards.

Metric Units

Where the Grading Rules use metric units, sawn goods will normally be supplied in the following UK standard metric dimensions:

Thickness and Widths in mm			12	16	19	22	25	32	38	44
			50	63	75	100	115	125	150	160
			175	200	225	250	275	300	etc	
Lengths in Metres	1.20	1.50	1.80	2.10	2.40	2.70	3.00	3.30	3.60	3.90
	4.20	4.50	4.80	5.10	5.40	5.70	6.00	6.30	6.60	6.90
	7.20	etc								

Other special and European Standard metric sizes would be specifically defined on the purchase contract and then sold on through the supply chain as these defined sizes.

Imperial Units

Where the original Grading Rules used imperial units, a conversion process will take place to achieve metric units for the sales transaction.

If the transaction involves full packs of timber as supplied from the country of origin, the quantity in cubic feet as provided by the original supplier will be converted directly to cubic metres, using the factor 35.315 ft^3 = 1 m^3. The original supplier may, on occasion, use an alternative imperial unit such as Board Measure. In such cases UK timber companies first convert the imperial unit to cubic feet before proceeding with the conversion to cubic metres.

If the transaction involves timber removed from its original packing, then there are two systems which may be used to achieve a metric quantity for sale:

System A, where the nominal Thickness, Width and Length of each piece are measured in imperial sizes and calculated to an imperial volume, which is then converted directly to cubic metres using the factor 35.315 ft^3 = 1 m^3.

NB: *Where goods were produced according to NHLA Grading, the rules do not require boards to be cut to specific imperial widths, but state when measurement takes place any board up to ½" oversize will be rounded down to the nearest inch, while any board between ½" and the next full inch will be rounded up to that dimension. It is trade practice to sell NHLA graded timber through the UK supply chain on this measurement basis.*

System B, where the actual Thickness, Width and Length of each piece are measured in metric sizes and the cubic metre volume calculated as the basis for the sales transaction.

Processing Before Sale Including Re-Sawing, Machining To PAR Or Mouldings

Where processing on imported timber is undertaken, then the sawing and machining will be carried out to specified finished sizes and dimensions, normally in metric. The equipment used for these tasks is, therefore, specifically calibrated to metric dimensions. Occasionally, stock may be sawn or machined to imperial units generally because they are required by the customer to match existing timber sections. It is trade practice to sell machined items based upon the nearest standard metric size as given in the list above.

Amended June 2011
Amended 2003
24 April 2001

National Hardwood Division
Timber Trade Federation

TIMBER TRADE FEDERATION

CODE OF CONDUCT

PANEL PRODUCTS CODE OF PRACTICE

All TTF Members dealing in panel products are required to adopt and comply with this Code of Practice for use as a public and promotional document forming an integral part of the TTF Code of Conduct.

Its aim is to assist Members in the promotion of their company's efforts to correctly supply accurately marked and labelled panel products and to ensure the exposure of those known to be breaching the code as a result of wilful product mis-labelling or mis-marking.

This code will apply to all wood-based panel products of any thickness and is binding to all TTF Members dealing in panel products.

1. All packing must be correctly and legibly marked with correct glue type, visual grade by face quality, nominal board thickness, manufacturer's mark and specific country of origin. These marking requirements must also apply to all panels where practicable. These requirements shall be incorporated in all supply contracts and documentation, including sales invoices.

2. Where products are offered as made to BS or BS EN standards, or the recognised standards of other producing nations, Members will seek to ensure that all the specification requirements of these standards are adhered to. For plywood products only, where no contractual reference is made to any of the above types of standards, nominal thickness tolerances and glue bond descriptions specified in the latest available versions of relevant standard(s) to be adhered to – refer to Panel Products Code of Practice 'Supplementary Guidelines – Structural Panels'.

2.1 Wood-based panels for construction, as defined within the Construction Products Directive and according to the timetable of that Directive, will meet the specific requirements set out in the Harmonised European Standard EN 13986.

2.2 Marine Plywood supplied by Members is to meet the requirements of BS 1088 *(Marine Plywood)*, Part 1 *(Requirements)* and Part 2 *(Determination Of Bonding Quality Using Knife Test)*. These two Parts together replace the earlier version, BS 1088 & 4079 : 1966(1988).

2.3 Where plywood is marked or claimed to be 'WBP', then evidence must be available to show that it had undergone a 72-hour boil test and met the full requirements to achieve an EN 314, Class 3 Glue Bond.

2.4 Plywood claiming to meet the higher performance level of EN 636, Class III should, in addition to demonstrating an EN 314, Class 3 Glue Bond, also provide evidence that all veneers used in its construction were sufficiently durable for exterior use which, on the basis of the recommendation in ENV 1099, would be species listed in EN 350 as Class 3 Moderately Durable and Better, which excludes the use of

sapwood. Where evidence is not available that the veneers meet this durability requirement, then written advice must be provided that a trader further down the supply-chain or end-user would have to preservative-treat or seal-treat the board in order for it to be sufficiently durable for normal exterior use.

3. No Member shall require any manufacturer or shipper to supply any product in an unmarked or mis-marked condition.

4. No Member will incorrectly describe any panel product offered for sale.

5. No Member will alter or deface any manufacturer's product or packing marks with the intention of misrepresenting the product's grade or description. Where Members receive goods that they have reason to believe have been altered or defaced they undertake to inform the National Panel Products Division ("NPPD") of the supplier involved via the TTF Code of Conduct Disciplinary Procedure.

6. In cases where Members believe a breach of the Code has been committed as a result of product misrepresentation it is agreed that this must be reported to the appropriate authorities. They also undertake to inform the TTF via the TTF Code of Conduct Disciplinary Procedure of the allegation and to co-operate in any subsequent investigation and any resulting disciplinary proceedings.

7. Members undertake to ensure that all relevant personnel employed by them will be conversant with and abide by the Code of Practice and its implications.

8. Members having ownership of stock, undertake to carry out random consignment inspections in respect of both imported and locally purchased products in order to verify that all product markings and descriptions accord with the requirements of the Code of Practice.

9. Where Members knowingly contravene any part of the Code of Practice, the NPPD will invoke the TTF Code of Conduct Disciplinary Procedure. All Members agree to abide by the current TTF Code of Conduct Disciplinary Procedure.

10. For specific clarification on adherence to the Panel Products Code of Practice, please refer to the attached 'Supplementary Guidelines – Structural Panels', otherwise please contact the Timber Trade Federation.

Supplementary Guidelines – Structural Panels

CE Marking

There may be much debate about what the Construction Products Directive *(CPD)* actually imposes as requirements on the supply chain, particularly in the UK where there is currently no mandatory requirement to CE mark. However, there are two clear facts:

a. Compliance with the CPD and CE Marking requires that anyone who handles or distributes a wood-based panel product must be in a position to demonstrate its 'fitness for purpose' in the construction environment.

b. Under the terms of the CPD, distributors, merchants and other such expert suppliers have a legal obligation to supply a product that is suitable for the communicated intended end-use.

Therefore, the simplest and most effective way of supplying a wood-based panel product, suitable for structural use, is to require compliance with BS EN 13986. However, this is not simply a matter of looking at a mark on the panel, nor holding a copy of a Notified Body Certificate of Conformity provided by the supplier. In order to comply with **a.** and **b.** above, each distributor or merchant must hold, or be fully confident they could provide if required, the relevant Initial Type Testing *(ITT)* relating to each and every product sold as 'structural'.

Plywood – Glue Bond

The term 'WBP' can only be achieved using a phenol-based resin and the panel must have undergone the testing requirements of the withdrawn BS 6566, Part 8. Therefore, any panel containing a non-phenol resin, or which includes a mixed glue line cannot be described as 'WBP'.

CE Marking does not recognise the term 'WBP', and simply using a phenol-based resin does not automatically qualify a plywood for any CE glue bond classification. All plywood for structural applications must have undergone glue bond testing in its final lay-up according to BS EN 314. Variation of resin mix or application of additional face veneers would invalidate this testing. BS EN 314 testing determines which end-use Service Class from BS EN 636 the plywood may be suitable for:

EN 636-1	dry
EN 636-2	humid
EN 636-3	exterior

Biological durability of veneer species will influence life expectancy of plywood, but at the present time this is not a production consideration. The decision of correct product rests with the designer who is advised to use the guidance in BS EN 335.

BS EN 13986 states that where formaldehyde-containing materials, particularly aminoplastic resins, have been added to the product as part of the production process, the product shall be tested and classified into one of two classes: E1 or E2.

The Standard requires the testing and declaration of formaldehyde emission class for all wood-based panels in construction. The only exception to the testing requirement is plywood using phenolic resin throughout, which is permitted to declare Class E1 without testing. Plywood comprising any other type of resin or mixed gluelines, for instance when additional face veneers are applied, must be tested or re-tested to determine its correct formaldehyde emission class.

Plywood – Structural Performance

A 2+ Certificate of Conformity from a Notified Body simply implies a plywood has been manufactured in a factory production control environment capable of producing structural panels. It gives no indication of the load individual panels are capable of carrying and, on its own, does not demonstrate fitness for purpose nor suitability for approved structural use.

BS 5268, Part 2, gives Structural Performance data only for the specific types of plywood listed in the appropriate tables. The supplier, normally within the Initial Type Testing data, must provide Structural Performance data for all other plywood claiming structural status. Variation of resin mix or application of additional face veneers would invalidate this testing.
Claims that structural plywood is equivalent to those listed in BS 5268, Part 2, means simply that structural properties have been tested in a similar way. However, the supplier must still provide the actual third-party results of structural testing performed on their products.

Plywood – Face Quality

The CE marking system does not recognise the face quality terms in the withdrawn standard BS 6566, Part 6, such as 'BB/CC', and therefore simply using one of these terms does not automatically qualify a plywood for any performance classification. Furthermore, within the CE marking criteria, quality of veneers used internally or on the face is not a defined requirement. However, initial type testing of structural performance would require a definition of the quality of veneers used, even if this was only in terms of density.

Notwithstanding CE marking, Members may describe their products using the face quality terms in the withdrawn standard BS 6566, Part 6, if they so choose. However, panels which are fall-down grades should always be described as such to prevent mis-representation of the product.

The European standards describing face quality of plywood are BS EN 635, Part 2 for Hardwoods, and Part 3 for Softwoods.

Other Wood-Based Panels

Unlike plywood, most wood-based panel products for structural application have tightly defined technical classes which should provide all the information necessary to correctly specify the product. The appropriate standards are listed below, and the descriptions used throughout the supply chain should always define a specific technical class, rather than simply using the generic name of the product, eg OSB.

Particleboard Panels To Meet BS EN 312

P4	load-bearing, dry
P5	load-bearing, humid
P6	heavy-duty load-bearing, dry
P7	heavy-duty load-bearing, humid

OSB Panels To Meet BS EN 300

OSB/2	load-bearing, dry
OSB/3	load-bearing, humid
OSB/4	heavy-duty load-bearing, humid

Hardboard Panels To Meet BS EN 622-2

HB.LA	load-bearing, dry
HB.HLA1	load-bearing, humid
HB.HLA2	heavy-duty load-bearing, humid

Medium Board Panels To Meet BS EN 622-3

MBH.LA1	load-bearing, dry

MBH.LA2	heavy-duty load-bearing, dry
* MBH.HLS1	* load-bearing, humid
* MBH.HLS2	* heavy-duty load-bearing, humid

Softboard Panels To Meet BS EN 622-4

* SB.LS	* load-bearing, dry
* SB.HLS	* load-bearing, humid

Dry Process Boards (MDF) Panels To Meet BS EN 622-5

MDF	general purpose, dry
MDF.H	general purpose, humid
MDF.LA	load-bearing, dry
* MDF.HLS	* load-bearing, humid

* ***Fibreboards*** *suitable only for structural applications where there are instantaneous or short-term loads only. The "S" in the type classification indicates this.*

Solid Wood Panels To Meet BS EN 13353

SWP/1	dry conditions
SWP/2	humid conditions
SWP/3	exterior conditions

Bibliography

NB: *The latest available versions of all Standards referred to apply*

BS EN 300 *Oriented Strand Board (OSB). Definitions, Classification And Specifications*

BS EN 312 *Particleboards. Specifications*

BS EN 314 *Plywood. Bonding Quality*
- -1 *Test Methods*
- -2 *Requirements*

BS EN 335 *Hazard Classes Of Wood And Wood-Based Products Against Biological Attack*
- -1 *Classification Of Hazard Classes*
- -2 *Guide To The Application Of Hazard Classes To Solid Wood*
- -3 *Application To Wood-Based Panels*

BS EN 622 *Fibreboards. Specifications*
- -2 *Requirements For Hardboards*
- -3 *Requirements For Medium Boards*
- -4 *Requirements For Softboards*
- -5 *Requirements For Dry Process Boards (MDF)*

BS EN 635 *Plywood. Classification By Surface Appearance*
- -2 *Hardwoods*
- -3 *Softwoods*

BS EN 636 *Plywood. Specifications*

BS 5268 *Structural Use Of Timber*

-2	*Code Of Practice For Permissible Stress Design, Materials And Workmanship*
BS EN 13353	*Solid Wood Panels (SWP). Requirements*
BS EN 13986	*Wood-Based Panels For Use In Construction. Characteristics, Evaluation Of Conformity And Marking*

Withdrawn

BS 6566	*Plywood*
Part 6	*Specification For Limits Of Defects For The Classification Of Plywood By Appearance*
Part 8	*Specification For Bond Performance Of Veneer Plywood*

Amended June 2011
Amended 24 February 2010
Amended 20 February 2008
Amended 22 February 2006
Amended 8 June 2005
Amended 12 March 2004
May 2003

National Panel Products Division
Timber Trade Federation

TIMBER TRADE FEDERATION

CODE OF CONDUCT

SOFTWOOD CODE OF PRACTICE

All TTF Members dealing in softwood and associated products are required to adopt and comply with this Code of Practice for use as a public and promotional document forming an integral part of the TTF Code of Conduct.

Its aim is to assist Members in the promotion of their company's efforts to correctly supply accurately marked and labelled products and to ensure the exposure of those known to be breaching the code as a result of wilful product mis-labelling or mis-marking.

This code will apply to all softwood products of any dimension and is binding to all TTF Members dealing in such goods.

1. Every effort will be made to ensure that products supplied will be correctly marked. Pack markings must correctly and accurately represent the timber which they contain, in terms of quality, dimension or structural grade. End stamps where they are applied should reflect the shippers normal published marking scheme.

2. Structural grade stamps where applied must comply with the marking requirements of BS EN 518 for Visual Grading, and BS EN 519 for Machine Grading, until such time as they are superseded by the marking requirements of the new harmonised standard EN 14081. This should include the application of a Wet or Dry mark to correctly represent the moisture content at the time when the Strength Grading took place and the stamp was applied. These requirements shall be incorporated in all supply contracts.

3. Where products are offered as made to BS or BS EN standards, or the recognized standards of other producing nations, Members will ensure that all the specification requirements of these standards are adhered to. In instances where no contractual reference is made to any specified standard, or specific agreement between the parties, the dimensional tolerances of the product will be as per BS EN 336 for Structural Softwood, BS EN 1313, Part 1, for Sawn and Processed Softwoods, and BS 1297 for Tongue and Groove Softwood Flooring. Furthermore, where preservative treatments are required, Members shall adhere to the guidance provided within BS 1282 for the choice, use and application of wood preservatives.

4. No Member shall require any producer or seller to supply any product deliberately mis-marked or unmarked, which may give a false impression of the grade, dimension, structural grade or origin of the goods in question.

5. No Member will mis-describe any softwood product offered for sale, in terms of dimension, quality or structural grade. This includes where structural timber is supplied that all reasonable efforts are made to identify constructional end uses and to ensure in such circumstances the material supplied complies with the moisture content requirements laid down in BS 4978 for Visual Strength Grading and the UK National Annex of BS EN 519 for Machine Strength Grading, until

such time as this latter Standard is replaced by the new harmonised standard EN 14081.

6. No Member will alter or deface any manufacturer's product or packing marks with the intention of misrepresenting the product's grade or description. Where Members receive goods that they have reason to believe have been altered or defaced they undertake to inform the National Softwood Division ("NSD") of the supplier involved via the TTF Code of Conduct Disciplinary Procedure.

7. In cases where Members believe a breach of the Code has been committed as a result of product misrepresentation it is agreed that this must be reported to the appropriate government or legal authorities. They also undertake to inform the TTF via the TTF Code of Conduct Disciplinary Procedure of the allegation, and to co-operate fully in any subsequent investigation and any resulting complaints proceedings.

8. Members undertake to ensure that all relevant personnel employed by them will be conversant with and abide by the appropriate Codes of Practice and their implications.

9. Members having ownership of stock undertake to carry out random consignment inspections in respect of both imported and locally purchased products in order to verify that all product markings and descriptions accord with the requirements of the Code of Practice.

10. Where Members knowingly contravene any part of the Code of Practice, the NSD will invoke the TTF Code of Conduct Disciplinary Procedure. All Members agree to abide by the current TTF Code of Conduct Disciplinary Procedure.

Amended June 2011
Amended 23 February 2010
Amended 21 Feb 2006
December 2002

National Softwood Division
Timber Trade Federation

TIMBER TRADE FEDERATION

CODE OF CONDUCT

ENVIRONMENTAL CODE OF PRACTICE

All TTF Members are required to adopt and comply with this Code of Practice for use as a public and promotional document forming an integral part of the TTF Code of Conduct. Its aim is to provide a generic set of commitments to ensure that companies are taking all possible steps to minimize their impact on the environment and source their timber products responsibly.

This code is binding on all TTF Members.

1. Members are committed to sourcing their timber and timber products from legal and well-managed forests. Members unreservedly condemn illegal logging practices and commit themselves to working with suppliers and other stakeholders to eliminate them.

2. Members recognize that the independent certification of forests and the process chain is the most useful tool in providing assurances that the timber they deal in comes from legal and well-managed forests.

3. Members will implement within their business, company or group a system of environmental due diligence. Acceptable examples of such a system include the TTF Responsible Purchasing Policy (or recognised equivalent), that rates the risk, back to the source forest, of supplies being illegal or suppliers operating illegally. Any due diligence system used by a Member will be formally approved by the Committee of Forests Forever according to the Core Criteria for Environmental Due Diligence, as amended from time to time by the Committee of Forests Forever, which are appended to this Code.

4. Members recognise that when dealing with some countries where governance is weak, and the risk of dealing in illegally logged or traded timber is high, credible evidence to demonstrate legality is necessary. The TTF will draw such cases to members' attention and produce guidance documents as to what evidence should be obtained. Members should note the level of evidence required is directly proportional to the level of risk and members must demonstrate due diligence through a risk assessment process. A good example of such a process is the TTF Responsible Purchasing Policy – a useful risk management tool that also encourages continual improvement towards sustainable forest practices. A failure to follow TTF guidance may invoke the Disciplinary Procedure.

5. Members will avoid misleading and unsubstantiated claims in relation to wood product supplies.

6. Members will make every reasonable effort to minimise the environmental impact of company activities in other ways including:

- By ensuring the efficient use of energy
- Minimising waste and utilising residues.

7. Members undertake to ensure that all relevant personnel employed by them will be conversant with and abide by the Code of Practice and its implications.

8. Where Members knowingly contravene any part of the Code of Practice the TTF will invoke the Code of Conduct Disciplinary Procedure and Members agree to abide by the current TTF Code of Conduct Disciplinary Procedure.

***NB**: In considering the risks associated in dealing with a particular country and evidence required, the TTF will consult the commodity divisions, external stakeholders and credible published information.*

Core Criteria for Environmental Due Diligence

1. **Independent Auditing**
   Any due diligence system must be made open and accessible to an independent audit to ascertain that it has been implemented in a manner that satisfies the Core Criteria for Environmental Due Diligence and the TTF Code of Conduct.

2. **Complete Supplier And Supplier Product Screening**
   Any due diligence system must require Members to screen all their suppliers and their suppliers' products for risk of illegality. In assessing the risk component due to country risk, the TTF will provide guidance that Members are expected to follow in accordance with Clause 4 of this Code.

3. **Standard Questionnaire And Objective Assessment System**
   Any due diligence system must utilise a standardised and systematic approach to assessing and evaluating risk that is proportional to the inherent level of risk associated with each supplier and the products they trade.

4. **Continuous Improvement And Target Setting**
   Any due diligence system must require systematic, progressive and meaningful reduction of risk over time.

5. **Supplier Feedback**
   Any due diligence system will as a matter of good practice require Members to provide feedback to their suppliers outlining the assessed risk rating and where the risk is greater than low, a range of suggested ameliorative actions.

6. **Objective Evidence**
   Any due diligence system will base any risk assessment on objective document-based evidence.

7. **Public Commitment To Legal/Sustainable**
   Any due diligence system must require Members to publish a statement that publicly commits them to sourcing legal and/or sustainable wood or wood products.

8. **Director Level Responsibility**
   Any due diligence system will require Director level commitment to its implementation.

9. **Annual Reporting**

Any due diligence system will require Members to produce an Annual Report which documents the findings of the risk assessment process and a plan of action to reduce that risk in accordance with Criteria 4.

10. 'Credible' Certification Schemes

In determining the credibility of certification systems for the purposes of compliance with Criteria 6 reference will be made to the advice provided by the UK Government's Central Point of Expertise on Timber.

11. Sanctions

Any due diligence system must include a process of effecting sanctions against a Member where following audit the Member has failed to properly implement the due diligence system. Where sanctions are imposed these will be notified to the Committee of Forests Forever which will determine whether to invoke the TTF Disciplinary Procedure.

Amended June 2011
Amended February 2008
May 2003

Environmental Division
Timber Trade Federation

Disciplinary Procedure

1. General Application

1.1 The following provisions and procedures shall apply to all complaints against Full Members alleging a breach of the Federation's Code of Conduct including that of its constituent Divisions.

2. Procedures

2.1 Upon receipt by the Federation of a complaint against a Full Member, the Federation shall in the first instance refer the complaint to the Chief Executive Officer of the Member for a response to the allegations made by the complainant which shall be provided within 14 days.

2.2 Where the complaint cannot be resolved by conciliation the complaint shall be referred to a Disciplinary Panel of the Governing Board formed in accordance with Clause 4 of this Code which shall determine in what manner the complaint shall be investigated and determined. The Disciplinary Panel may appoint a suitably qualified independent investigator to prepare a factual report based on the evidence of both parties.

2.3 The Member and the complainant shall co-operate with the investigation and shall without limitation and in a timely manner provide such evidence as is in their possession or under their control to the Disciplinary Panel or its appointee(s), and shall permit the Disciplinary Panel or its appointee(s) to visit their premises, inspect their goods and where appropriate obtain and test any product relevant to the complaint.

2.4 Failure of a Member to comply with the requirements of this Clause 2 shall be itself considered a breach of the Code of Conduct.

3. Decisions

3.1 The Disciplinary Panel shall determine whether or not and to what extent a Complaint has been upheld and shall make a recommendation to the Governing Board on the appropriate sanction to be applied to the member.

3.2 The sanction to be applied to the member shall be limited to a warning, fine, suspension or expulsion from membership of the Federation.

3.3 Any recommendation shall be considered at the earliest opportunity by the Governing Board of the Federation which will accept, reject or amend the recommendation.

3.4 The decision of the Governing Board shall be communicated in writing to the parties within 7 days from the date of the meeting at which the decision was made.

3.5 The decision of the Governing Board shall be final, save that in the case of expulsion from membership of the Federation the Member shall have the right to appeal the decision. Any such appeal must be made in writing to the Federation within 28 days from the date of the notification of the decision to the parties.

3.6 An appeal shall be heard by the Governing Board at the first meeting of the Board, following receipt of the notice of appeal. The appellant or a representative of the appellant shall have the right to appear in person before the Board to state the reasons why the appeal is being made.

3.7 The Board shall consider the appeal and determine whether to uphold or reject the appeal. The decision of the Board will be communicated to the appellant in writing within 7 days of the date of the meeting at which the appeal was heard.

3.8 Any decision to expel shall be effective immediately following the period allowed for an appeal or as the case may be 7 days following a meeting of the Governing Board at which an appeal against expulsion has been rejected.

3.9 In the event of suspension or expulsion the Member shall not be entitled to the refund of any subscription.

4. The Disciplinary Panel

4.1 A Disciplinary Panel consisting of the President or Vice-President together with 3 TTF Directors selected by the Chief Executive from the current Governing Board membership will be convened by the Chief Executive. The members selected will be approached on the basis of their impartiality, experience and availability. It is the responsibility of the Chief Executive to decide whether any declared interest is considered to raise a conflict of interest.

4.2 The Disciplinary Panel will be chaired by either the Chair or Vice-Chair of the Governing Board (if the Chair has a Conflict of Interest then it falls to the Vice-Chair). If neither is suitable the Chief Executive will appoint a Chair. The Timber Trade Federation will be represented on the Panel by the Chief Executive or his appointed designate and will act in an advisory capacity with no voting rights. In the event of a vote should the vote be tied the Chairman shall have a second casting vote.

4.3 All Disciplinary Panel members are required to sign a confidentiality agreement and a conflict of interest declaration.

4.4 If any additional conflict arises, the Disciplinary Panel member must inform the Timber Trade Federation of the change before undertaking membership of the Disciplinary Panel.

5. Costs

5.1 In the event the complaint requires the Disciplinary Panel to incur costs associated with the complaint then the Member against whom a sanction is imposed under Clause 3.2 or whose complaint is rejected shall pay those costs.

Amended June 2011
May 2003

Timber Trade Federation