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Category	No.	Indicator	Verification of Compliance
Sustainability policy and leadership	1	Sustainable forestry policy or commitment for all its operations	See website: policies.
	2	Sustainable forestry policy or commitment applies to all suppliers	
	3	High-level position of responsibility for sustainability	COO, Chief Forester, Sustainability Head
	4	One or more members within the board of the company have responsibility for sustainability	Deleted Not publicly listed
	5	Percentage or number of women in senior management team	2022 - Three - Heads of: Sustainability, Treasury & Business Development
	6	Percentage or number of women board members	Deleted Not publicly listed
	7	Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with timber and pulp production	PEFC/MTCS Sarawak Timber Association (STA) Initiatives: Natural Resources and Environmental Board (NREB) Sarawak's requirements for Environmental Impact Assessment (EIA)s; Sarawak Timber Legality Verification System (STLVS)

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	8	Collaboration with stakeholders to reduce negative environmental or social outcomes associated with timber and pulp production	1) Supplied two members of the Malaysian Timber Certification Council's (MTCC) Stake holder Review Committee for the review of the PEFC Endorsed MTCS's MC&I in their Standards Review Committee to publish MC&I SFM 1/2020 for application of certification scheme in 2021. 2) Represented and participated in STA's various Committees in collaborative discussions to improve negative environmental and social outcomes: i) STA Certification Committee to monitor progress of FMU certifications among members in the industry and consultation with relevant stakeholders and Authorities to resolve issues during certification progress (on-going) ii) Occupational Safety and Health (OSH) Committee (STA) in collaboration with Sarawak Department of Safety & Health (DOSH) and Sarawak Timber Industry Development Corporation (STIDC) in the development of the OSH in Forestry Industries (Train The Trainer) programme (endorsed by DOSH, Sarawak) to enable the industry to carry out its own training to enhance the awareness and practices in OSH with the aim to improve the performances in the industry (2021). 3) In 2021- collaborated with Ministry of Health, Malaysia and its agencies to accelerate Covid-19 vaccination programmes by taking part in setting up industry-based vaccination centre (PPVIN) in Bintulu plywood mill for own and other mills' workers to be vaccinated in the drive to flatten the Covid-19 infection curve. 4) In 2022- collaboration with WWF-Malaysia, FORMADAT (Native Committee) and Nottingham University (Malaysia Campus) for the river bank restoration at Lg. Telingan, Punang-Trusan, Lawas, Samling continues to provide and maintains the access road and assistance to FORMADAT/WWF for the restoration works to take place. 5) Heart of Borneo Declaration/Initiative (HoB) – Samling is a participant with a significant area within the HoB, Sarawak with its commitment to sustainable forest management to promote environmental conservation. 6) ITTO: Informal cooperation with Sarawak office. Samling is a primary stakeholder in the proposed ITTO project – The Upper Baram Forest Area.

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	9	Sustainability report published within last two years	Timber Sustainability report 2020. Timber Sustainability Report 2021 coming up
	10	Reports through standardised reporting systems	
	11	Climate risks assessment available	See website: under Sustainability - Governance
	12	Natural capital assessment available	EIAs are mandatory for all resource based projects. HCVAs are mandatory in the certification process
Landbank, mills and traceability	13	Landbank, mills and traceability Lists countries and operations	Malaysia (upstream & downstream), Guyana (downstream) , China (downstream), Russia (downstream)
	14	Lists countries sourcing from	No logs are imported for processing.
	15	Total area of natural forest designated for wood/wood fibre production (ha)	Gross: 1,096,459 ha; Operable: 742,730ha (31 March 2022) (from government approved General Harvesting Plans)
	16	Total area of forest plantation (ha)	Planted area: 35,000 ha (May 2022)
	17	Area of plantation/natural forest within outgrower schemes (ha)	Disabled No outgrower schemes
	18	Unplanted (areas designated for future development as plantation forest) (ha)	Only government sanctioned planting areas of degraded forest: approx. 30,000 ha (June 2021)

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	19	Conservation set-aside area, including HCV area (ha)	226,537 ha (21 May 2021) Refer to Miscellany of Facts 60 /19
	20	Area of Intact Forest Landscape (ha)	Approx. 114,173 ha of primary forest (29 May 2020)
	21	Number of Forest Management Units (FMUs)	10 FMUs; 6 LPFs under ITP (21 March 2021)
	22	Maps of forest management units (FMUs)	All FMUs have detailed mapping (General Harvesting Plans) but availability is restricted. However, the website has public summaries for all certified areas & these contain maps & some are on Global Forest Watch (GFW).
	23	Forest management plans available for all FMUs	All licenced areas must have an FMP. Website – public summaries for all certified areas
	24	Monitoring of forest management plan implementation available	Website – public summaries for all certified areas. All certified areas are subject to 3 rd party Certification Body (CB) annual surveillance audits All FMUs & LPFs are required to have quarterly EMRs or 3 x year ECAs (Environmental Monitoring Reports / Environment Compliance Assessments)
	25	Company has provided valid legal documents to Open Timber Portal on use right (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC
	26	Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC

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	27	Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC
	28	Names and locations of all third-party supplying FMUs	
	29	Number of company owned sawmills	Refer to Miscellany of Facts 11
	30	Names and locations of company owned sawmills	Refer to Miscellany of Facts 11 & 12
	31	Number of company-owned pulp and paper mills	Disabled No company-owned pulp and paper mills
	32	Names and locations of company-owned pulp and paper mills	Disabled No company-owned pulp and paper mills
	33	Total volumes (or percentages) sourced by company-owned sawmills that come from company's own FMUs and/or third-party FMUs	Refer to Miscellany of Facts 63
	34	Total volumes (or percentages) sourced by company-owned pulp and paper mills that come from company's own FMUs and/or third-party FMUs	Disabled No company-owned pulp and paper mills & not in pulp & paper business
	35	Number of supplying mills	Disabled Not in pulp and paper business. No supply from third party sawmills.

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	36	Names and coordinates of all third party supplying mills	Disabled Not in pulp and paper business. No supply from third party sawmills
	37	Total volume (or percentages) sourced from third-party supplying mills that come from their own FMUs and/or third party FMUs	Disabled Not in pulp and paper business. No supply from third party sawmills
	38	Procedures to trace raw materials to country of harvest	All raw material for mills is sourced from FMUs that are located within country of processing.
	39	Percentage of supply traceable to country of harvest	All supply is within the country of processing.
	40	Procedures to trace raw materials to FMU level	100% of log production is traceable to FMU level thru Sarawak government procedures which mandate the issue of log Removal Passes
	41	Percentage of supply traceable to FMU level	100% of sawmill supply traceable to FMU via company Logs Delivery Order (LDOs) & government Removal Passes
Certification standards	42	Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved	i) Natural forest to be certified by December 2022. ii) The Industrial Tree Plantations (ITP) are constrained by FSC & PEFC cut-off dates but are eligible areas by 2025. iii) All natural forest operating areas that are not under MTCS are under STLVS.
	43	Percentage area (ha) verified as being in legal compliance by a third party	Natural forest: 56.3% is under either PEFC endorsed MTCS or under STLVS ITP: 50% of the planted area is under PEFC endorsed MTCS
	44	Time-bound plan to source only wood/wood fibre that is	Natural forest by December 2022 – government requirement ITP constrained by FSC & PEFC cut-off dates; some currently uncertified areas cannot be FMC certified unless the cut-off dates are revised but these will be PEFC – Controlled Source

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		in legal compliance verified by a third party	
	45	Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party	2020 – 66.6%
	46	Percentage area (ha) FSC FM certified	0%
	47	Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs	Using PEFC endorsed MTCS
	48	Percentage of wood/wood fibre supply (tonnes) from all suppliers that comes from FSC FM certified areas	0%
	49	Commitment to source only wood/wood fibre that meets FSC Controlled Wood requirements	
	50	Percentage area (ha) PEFC certified (excluding FSC certified area)	2020 - 29.5% of the gross forest resource area
Deforestation and biodiversity	51	Commitment to zero deforestation or zero conversion of natural ecosystems	The government licenced ITP areas are established on degraded forest. There is zero clearing of natural, undisturbed ecosystems.
	52	Commitment to zero deforestation or zero conversion of natural	

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		ecosystems applies to all suppliers	
	53	Criteria & cut-off date for defining deforestation.	
	54	Evidence of monitoring deforestation	There is zero clearing of natural, undisturbed ecosystems hence no monitoring is required.
	56	Amount of illegal/non-compliant deforestation recorded	2019 - Nil
	57	Amount of illegal//non-compliant deforestation recorded in supplier operations	Should be 0% in that supplier are from very small areas of degraded forest licenced by government to be cleared for small scale agricultural local and state agricultural developments or they are in standard forest timber licence (FTL) where FDS controls operate – including aerial surveillance.
	58	Commitment to restoration of non-compliant deforestation/conversion	Working with Sarawak Forestry Dept (FDS) in Forest Landscape Restoration: e.g. Kelesa Camp, Tuyut & Lawas log ponds. Significant assistance to WWF with Riverbank Restoration, Lg Semadoh, Upper Trusan, Lawas, Sarawak.
	59	Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers	
	60	Implementing a landscape or jurisdictional level approach	Significant participant in the WWF – inter-government Heart of Borneo (HOB) project. Samling is a primary stakeholder in ITTO's Upper Baram Forest Area (UBFA) project (proposed) . A large- scale project with the Forestry Department Sarawak, local communities and NGOs.
	61	Commitment to biodiversity conservation	Demonstrated with 32% of the natural forest FMU area excluded from production areas. Appointment of Honorary Wildlife Wardens. Work with University Putra Malaysia, Bintulu Campus on Payeh Maga Conservation Area; Supporting work in Proposed Mujan Julian NP. Work with Sarawak Forestry Corp. (SFC) on HCV assessments. See Policy with commitment to uphold international treaties & conventions on biodiversity.

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	62	Commitment to biodiversity conservation applies to all suppliers	
	63	Identified species of conservation concern, referencing international or national system of species classification	In place. See Public summaries on website. HCVAs use international and national systems of species classification e.g. Red Book & IUCN
	64	Examples of species and/or habitat conservation management	Various HCV areas (1 to 6) are identified and protected, river buffer zones (mandatory) are established. Regular patrols inside FMUs. Management prohibits hunting by employees & contractors. Specific memo on protection of Pangolin distributed to all upstream operations.
	65	Commitment to no hunting or only sustainable hunting of species	Management fully committed to no hunting policy of all species by company employees & contractors. The law allows locals to hunt those species not specifically protected by law for own consumption.
	66	Commitment to no hunting or only sustainable hunting of species applies to all suppliers	
	67	Commitment to protect forest areas from illegal activities	Committed to protect forest areas from unauthorised or illegal resource use, settlement and other illegal activities. FMUs patrol regularly. This is monitored by 3 rd party Certification Body (CB) annual surveillance.
	68	Commitment to protect forest areas from illegal activities applies to all suppliers	
	69	Evidence of protecting forest areas from illegal activities	This is inspected by 3 rd party CB during annual surveillance. Signage and regular patrols. Boundary patrols undertaken by helicopter. Regular inspection of satellite imagery.
	70	Commitment to no use of genetically modified organisms	NB: Should only be applicable to ITP. GMO cannot be used if FSC or PEFC certified. See website - policies
	71	Commitment to no use of genetically modified organisms applies to all suppliers	

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HCV, HCS and impact assessments	72	Commitment to conduct High Conservation Value (HCV) assessments	These are a requirement for FSC & PEFC certification & we are committed to certification of plantations where the cut-off allows and to the natural forest. Four more natural forest FMUs are in the certification pipeline. [See Public Summaries]
	73	Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers	
	74	High Conservation Value (HCV) assessments available	In the FMP Public Summaries see website
	75	High Conservation Value (HCV) management and monitoring plans available	In the FMP Public Summaries see website
	76	Commitment to the High Carbon Stock (HCS) Approach	HCS assessments undertaken as and when applicable
	77	Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers.	
	78	High Carbon Stock (HCS) assessments available	
	79	Commitment to conduct social and environmental impact assessments (SEIAs)	EIAs are mandatory for all Forest Timber Licences (FTLs) & License for Plantation Forests (LPFs) before forest operations can start. Similarly with SIAs in our certified areas.
	80	Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers	
	81	Social and environmental impact assessments (SEIAs) available, and associated	Summary SIA information is contained the FPMs – see public summaries

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		management and monitoring plans	
	82	Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)	Disabled Do not operate in RoC, Cameroon or DRC
Soils, fire and GHGs	83	Commitment to no planting on peat of any depth	
	84	Commitment to no planting on peat of any depth applies to all suppliers	No supplier of ITP logs is known to have peat soil.
	85	Landbank or planted area on peat (ha)	Planted area: 3,324 ha (June 2022) government approved tree planting plan.
	86	Implementation of commitment to no planting on peat of any depth	
	87	Commitment to best management practices for soils and peat	Full commitment to Reduced Impact Logging (RIL) practises. Use of log fisher in Natural Forest and yarders in ITP
	88	Commitment to best management practices for soils and peat applies to all suppliers	No suppliers operate on peat soils.
	89	Evidence of best management practices for soils and peat	Full commitment to RIL practices. Use of log fisher in Natural Forest (NF) and yarders in ITP. See Public Summaries (Sections on RIL & Harvesting)

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	90	Commitment to reduced impact logging	RIL is a mandatory government requirement to obtain a PEC [permit to enter coupe] for all natural forest FMU operation. Harvesting in ITP is by yarder i.e. rarely by ground based thereby reducing impact of harvesting.
	91	Commitment to reduced impact logging applies to all suppliers	
	92	Evidence of implementing reduced impact logging practices	As stated in #90 RIL is mandatory. A Permit to Enter Coupe will not be issued by FDS unless all RIL conditions are complied with e.g. 100% enumeration, with ID tagging, of trees to be harvested. Plantation harvesting is yarder based.
	93	Commitment to zero burning	
	94	Commitment to zero burning applies to all suppliers	
	95	Evidence of fire monitoring and management	In the natural forest & the ITP of the everwet tropics fire is not usually a major issue. Government manages active satellite based hotspot alert system.
	96	Details/number of hotspots/fires in company FMUs	2021 – exceedingly wet year & no hotspots/fires.
	97	Details/number of hotspots/fires in suppliers operations	Major supplier states no hotspots/fires.
	98	Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity	
	99	GHG emissions intensity	2019 Our natural forest harvesting operations had an average GHG intensity 57kg CO2e/m3 to log pond. Our tree plantation (ITP) operations had an average GHG intensity of 29kg CO2e/m3 to log pond.

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	100	GHG emissions from land use change	
	101	Progress towards commitment to reduce GHG emissions intensity	
	102	Methodology used to calculate GHG emissions	GHG computation: (litres of diesel consumed in year/annual log production delivered to log pond or mill)*2.72 = kg CO ₂ e/m ³ log delivered
Water, chemical and pest management	103	Time-bound commitment to improve water use intensity	Disabled No pulp/paper
	104	Water use intensity	Disabled No pulp/paper
	105	Progress towards commitment on water use intensity	Disabled No pulp/paper
	106	Time-bound commitment to improve water quality (BOD and COD)	Disabled No pulp/paper
	107	Progress towards commitment on water quality (BOD and COD)	Disabled No pulp/paper
	108	Treatment of pulp and paper mill effluent	Disabled No pulp/paper
	109	Evidence of sawmill run-off containment and wastewater treatment	
	110	Proportion of processing facilities with closed-loop water treatment system	Disabled No pulp/paper

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	111	Commitment to protect natural waterways through buffer zones	River Buffer Zones (RBZs) are mandatory & specified in the EIAs for NF & ITP. RBZs area monitored by 3 rd party CB surveillance audits, during mandatory Environmental Monitoring Reports (EMRs) or Environment Compliance Assessments (ECAs). Establishment of river buffer zones (RBZs) is an integral part of the mandatory RIL process
	112	Implementation of commitment to protect natural waterways through buffer zones	100% as River Buffer Zones are mandatory & specified in the EIAs. Also monitored by 3 rd party CB surveillance audits, mandatory EMRs or ECAs . They are an integral art of the mandatory RIL process
	113	Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers	See Policy on website
	114	Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers	
	115	Time-bound commitment to eliminate chlorine and chlorine compounds for bleaching	Disabled No pulp/paper
	116	Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides	Yes. See Policy on website
	117	Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers	
	118	Commitment to no use of chemicals listed under the	Yes. See Policy on website

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		Stockholm Convention and Rotterdam Convention	
	119	Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers	
	120	Chemical usage per ha or list of chemicals used	Over the operational area: Herbicides: 5.8 l/ha (glyphosate) & 96.9g/ha metsulfuron. Fertiliser: av 81.8 kg/ha
	121	Implementation of commitment to reduce chemical usage	R&D has fertiliser trials in place
	122	Integrated Pest Management (IPM) approach	R&D is developing this
	123	Waste management system in place to avoid negative impacts	See web site - Policies In-house waste management plan in place
Community, land and labour rights	124	Commitment to human rights	See web site - Policies
	125	Commitment to human rights applies to all suppliers	
	126	Progress on human rights commitment	Already 100% committed. Human rights is actually not an issue as reference to Sarawak's Department of Labour will confirm.
	127	Commitment to respect indigenous and local communities' rights	100% compliance with the requirements of Principles 2 & 3 of the MC&I of the PEFC endorsed MTCS. Annual 3 rd party assessment during STLVS & PEFC/MTCS surveillance & re-certification audits.
	128	Commitment to indigenous and local communities' rights applies to all suppliers	

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	129	Commitment to respect legal and customary land tenure rights	100% Complies with the requirements of Principles 2 & 3 of the MC & me of the MTCS. Annual 3 rd party assessment during STLVS & PEFC/MTCS surveillance & re-certification audits
	130	Commitment to legal and customary land rights applies to all suppliers	
	131	Commitment to free, prior and informed consent (FPIC)	FPIC is required by the MTCS MC&I by reference to Principle 3 Criterion 3.1. 3 rd party Assessment by independent CBs during STLVS & PEFC/MTCS surveillance & re-certification audits confirms compliance.
	132	Commitment to free, prior and informed consent (FPIC) applies to all suppliers	
	133	Details of free, prior and informed consent (FPIC) process available	Website: see under CSR then under Community see Dialogue and Community engagement
	134	Examples of local stakeholder engagement to prevent conflicts	Formation of Community Relationship Committees (CRCs) in communities in, or neighbouring, the FMUs and ITPs. (However, not all communities wish to form CRCs.) Community engagement in the Forest Management Certification Liaison Committee meetings chaired by Sarawak Forest Department.
	135	Details of process for addressing land conflicts available	SOP for conflict resolution available – see website under CSR then Grievances
	136	Supports the inclusion of women across forestry operations, including addressing barriers faced	A very significant percentage of women are employed in the forest nurseries. Women are eligible to participate in the CRCs (but that is a community controlled matter). Over 23.9 % of employees are female. In past we had a trans-gender pruning crew. (After several years they ceased to work on their own accord and returned to Indonesia.)
	137	Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC

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	138	Commitment to enable sustainable use of non-timber forest products (NTFPs) by local communities	Where applicable local communities and indigenous people have their rights of access to the permanent forest estate (for NTFPs) enshrined within the gazette notification. Community grievances on this – or any other matter – may be put to the (Certification Body) CB at the time of audit. The CB will require a satisfactory response from FMU management.
	139	Commitment to provide essential community services and facilities	Samling is heavily committed to CSR and outreach directly via the group and the YTS Foundation. Google this for verification: Samling outreach programmes.
	140	Progress on commitment to provide essential community services and facilities	Samling is heavily committed to CSR and outreach directly via the group and the YTS Foundation. Google for verification: Samling outreach programmes.
	141	Commitment to provide business/work opportunities for local communities	Samling employs significant numbers of locals especially in upstream activities.
	142	Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)	Disabled. Does not operate in RoC, Cameroon or DRC
	143	Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles	All upstream camp notice boards specifically address the right of "freedom of association" in respect of trade union formation and /or participation [ILO 87 & 98]. This is also a specific requirement of PEFC FM certification. This is reinforced by annual briefings undertaken by the industrial relations officer from HQ HR. ILOs 29, 87, 98, 100, 105 & 111 are referred to in the MC&I of the PEFC endorsed MTCS.
	144	Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers	

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	145	Progress on commitment to respect all workers' rights	All camp notice boards specifically address the right of "freedom of association" in respect trade union formation and /or participation [ILO 87 & 98] This is also a specific requirement of FSC & PEFC. This is reinforced by annual briefings undertaken by the industrial relations officer from HQ HR.
	146	Commitment to eliminate gender related discrimination with regards to employment	See website Policies Malaysian employment records clearly demonstrate that there is no gender related discrimination. In past we had trans-gender pruning crew. (After several years they ceased to work on their own accord.)
	147	Commitment to eliminate gender related discrimination with regards to employment applies to all suppliers	
	148	Progress on commitment to eliminate gender related discrimination with regards to employment	Employment records clearly demonstrate that there is no gender related discrimination. In the past we had trans-gender pruning crew. (After several years they ceased to work on their own accord.)
	149	Percentage or number of temporary employees	No seasonal or casual employment is offered.
	150	Percentage or number of women employees	Sarawak -23.9% (2019) Refer to Misc of Facts for further info
	151	Commitment to pay at least minimum wage	In all the countries that we operate in it is a legal requirement that all employees receive not less than the minimum wage.
	152	Commitment to pay at least minimum wage applies to all suppliers	Yes; otherwise we would not be complying with the law. It is a legal requirement that all employees receive not less than the minimum wage.
	153	Progress on commitment to pay at least minimum wage	100% It is a legal requirement that all employees receive not less than the minimum wage.
	154	Reporting of salary by gender	Yes: e.g. Downstream women supervisors receive 93.8% of the male counterparts. For workers the figure is 88.8% (May 2020)

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	155	Commitment to address occupational health and safety	Active in-house HSE division with departmental HSE committees. See website - Policies. Both Department of Safety and Health (DoSH) & Department of Environment? (DoE) regularly inspect operations.
	156	Commitment to address occupational health and safety applies to all suppliers	
	157	Provision of personal protective equipment and related training	PPE & training is provided throughout timber operations. In addition to the certification annual surveillance audits there 3 rd party chemical risk assessment undertaken every 5 years
	158	Time lost due to work-based injuries	For 2020 and 2021, there were zero fatalities in Samling's forestry operations
	159	Number of fatalities as a result of work-based accidents	Deliveries to all our mills are from legal sources with 67.4% being 3rd part certified as such.
Smallholders and suppliers	160	Commitment to support smallholders	Disabled No small holders
	161	Programme to support outgrower scheme and/or independent smallholders	Disabled No outgrower or small holder schemes.
	162	Percentage of outgrower scheme and/or independent smallholders involved in programme	Disabled No outgrower or small holder schemes.
	163	Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements	

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	164	Number or percentage of suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements	
	165	Suspension or exclusion criteria for suppliers	
	166	Timebound action plans (including Key Performance Indicators) for suppliers to be in compliance with timber and pulp sourcing commitments	
	167	Proportion of direct and indirect supply that comes from FMUs which are compliant with timber and pulp sourcing policies	Log supplies to all our mills are from legal sources with 64.7% being 3 rd party verified as such
Governance and grievances	168	Commitment to ethical conduct and prohibition of corruption	See web site Policies Commitment to both ethical & fair conduct and prohibition of corruption (bribery/fraud).
	169	Commitment to ethical conduct and prohibition of corruption applies to all suppliers	See web site Policies Commitment to both ethical & fair conduct and prohibition of corruption (bribery/fraud
	170	Progress on commitment to ethical conduct and prohibition of corruption	2020 No case of such misconduct reported
	171	Company has provided valid legal documents to Open Timber Portal on legal	Disabled Does not operate in RoC, Cameroon or DRC

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		registration (at the time of SPOTT assessments)	
	172	Disclosure of the company's management approach to tax and payments to governments	Samling engages KPMG Tax and Deloitte Tax to review and check on the Group's tax compliance as well as advise on tax matters.
	173	Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)	Disabled Does not operate in RoC, Cameroon or DRC
	174	Whistleblowing procedure	See website Policies
	175	Own grievance or complaints system open to all stakeholders	Grievance procedure with flow chart available to all employees.
	176	Details of complaints and grievances disclosed	