

Office Memorandum

finch

Finch Paper LLC
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www.finchpaper.com

To: SFI COC Responsible Employees and Managers

From: Deba Mukherjee

Date: June 19, 2023

Subject: **Commitment to the Sustainable Forestry Initiative® (SFI) Standard and the PEFC International Standard for Chain of Custody**

Finch Paper LLC is committed to implementing and achieving the Sustainable Forestry Initiative (SFI) Standard and the PEFC International Standard for Chain of Custody.

Finch Paper LLC takes its commitment to sustainable forestry very seriously. Therefore, I want to communicate that commitment to each of our mill managers, field foresters, wood procurement foresters and other employees with responsibility for implementing the SFI Standard. We want to ensure that all of our managers and responsible employees understand and are encouraged to help us implement and achieve the SFI Standard.

Finch Paper LLC is also committed to implementing and maintaining the SFI Chain of Custody Standard and the PEFC Chain of Custody Standard. As part of this Standard we state that the pulpwood that we purchase comes from sustainably managed sources. In other words, we know the source of all of the forest-based raw material.

Finch Paper LLC is also committed to comply with applicable federal, state and local laws and regulations, including social laws, civil rights, equal employment opportunities, gender equality, diversity inclusion, anti-discrimination and anti-harassment, workers' compensation, Indigenous Peoples' right, workers' and communities right to know, prevailing wages, workers' rights to organize, and occupational health and safety, which meet the spirit and intent of the International Labour and Organization (ILO) Declaration on the Fundamental Principles and Rights at Work (1998).

An important requirement of implementing both the SFI and PEFC Chain of Custody Standards is that we carry out a regular periodic review of Finch Paper LLC chain of custody and its compliance with the standards. I would like to ask each of you for your input and feedback on ways that we can effectively implement our sustainable forestry policy and improve our SFI and PEFC Programs. Your input into our progress review will help ensure that we continue to achieve SFI and PEFC Standard conformance and continual improvement.

Deba Mukherjee
President & C.E.O.
Finch Paper LLC
Date: June 19, 2023

FINCH PAPER LLC WOOD PROCUREMENT POLICY



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June 11, 2024

To help ensure a continuous supply of health, growing forests and high quality, affordable forest products for people today and in the future, Finch Paper LLC endorses the Sustainable Forestry Initiative® Fiber Sourcing Standard.

Finch Paper LLC will promote Sustainable Forestry through its wood procurement policies by:

- Building roundwood inventories in advance for the spring and fall in recognition of the limited acreage suitable for environmentally sound harvesting during those periods; continue to look for stockpiled inventories that could be purchased and delivered during spring and fall.
- During periods of restricting roundwood deliveries, we will favor deliveries from 3rd party certified properties and from timber harvesters who maintain their professional logger certification.
- Strongly encourage all timber harvesters selling wood to our company to use Best Management Practices (BMP's), as defined by the individual states, during all seasons of the year.
- Strongly encourage all timber harvesters selling wood to our company to obtain and maintain professional logger certification or licensing through a logger training program that supports SFI® Principles and Guidelines.
- Provide an incentive payment to timber harvesters selling wood to our company who obtain and maintain professional logging certification and harvest timber under the supervision of a SAF member or licensed forester representing the landowner utilizing a silvicultural system that addresses regeneration.
- Strongly encourage all landowners selling wood to our company to hire a professional forester to plan and supervise each harvest. Landowners should also be personally involved with the implementation of this plan.



June 11, 2024

Finch Paper LLC
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Dear Wood Producer,

Finch Paper LLC wants to inform you of our continued commitment to implement and achieve the Sustainable Forestry Initiative (SFI) Fiber Sourcing Standard (2022 Edition). Attached for your information is a copy of our Wood Procurement Policy. This policy describes our commitment to SFI, and outlines how our company complies with applicable legal and regulatory requirements.

We encourage you to adopt principles of sustainable forestry in your operations, similar to those contained within the SFI standard. We encourage you to comply with all applicable laws and regulations in your operations.

We request your assistance in encouraging all landowners that supply wood to Finch Paper LLC to regenerate the forest following harvest, ensure that appropriate state BMP's are implemented to protect water quality, consider the aesthetics of their forestry operations, and to take appropriate steps to protect wildlife and biodiversity. Finch Paper LLC also has SFI Information Packet for landowners that you purchase timber from, addressing these sustainable forestry issues. Should you or landowners need a copy, please contact the Woodlands and Wood Procurement office.

We continue to provide an incentive payment to wood producers that maintain their professional logger certification, and harvest timber under the supervision of an SAF Member or licensed forester representing the landowner that encourages the use of a silvicultural system that addresses regeneration. And in the spirit of continual improvement, please encourage other landowners from whom you purchase wood to utilize the services of qualified resource and logging professionals.

Finch Paper LLC appreciates your help in improving the professionalism of the forestry community and the practice of sustainable forestry. If you have any questions about our Sustainable Forestry Initiative Program, please feel free to contact me at 518-793-2541, Ext. 5550. **If you suspect SFI® inconsistent practices, confidential calls can be placed at 1-888-SFI-GOAL (1-888-734-4625).**

Respectfully,



Ben Povak
Director, Forestry and Fiber
COC Program Manager
Finch Paper LLC



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Finch Paper LLC

FSC Forest Management, Controlled Wood, and COC Policy

Finch Paper LLC ("Finch") is committed to implementing and achieving the Forest Stewardship Council ("FSC") FSC-US Forest Management Standard (V 1.1), FSC-STD-40-004 (V3-1), and FSC-STD-40-005 (V3-1) for its Forest Management ("FM"), Controlled Wood ("CW"), and Chain of Custody ("COC") program to broaden the practice of sustainable forestry.

Finch employs scientifically, environmentally, socially, and economically sustainable forestry practices to meet the needs of the present without compromising the ability of future generations to meet their needs. This is accomplished by practicing and promoting land stewardship ethics that integrates responsible forestry, timber harvesting, and wood utilization practices that conserve soil, air, water quality and biological diversity, wildlife and aquatic habitat, recreation opportunities, and landscape aesthetics.

Finch's FSC Policy is to implement and achieve the Principles of Sustainable Forest Management, including: practicing sustainable forestry, employing responsible practices, regenerating the forest and maintaining productive capacity, protecting and maintaining long-term forest and soil productivity, protecting water resources, protecting special sites and biodiversity, complying with legal requirements, and continually improving forest practices.

To help implement and achieve the FSC Principles, Criteria, and Indicators, Finch has developed and adopted appropriate policies and structure to guide its Forest Management and Wood Procurement programs.

The FSC COC Standard requires Finch to track the source of all pulpwood purchased to make its products, and requires Finch to perform due diligence on its supply chain to ensure all fiber inputs are derived from sustainably managed sources. Finch carries out a regular review of the COC standards and Finch's compliance with the standards.

Finch is committed to comply with applicable federal, state, and local laws and regulations, including social laws, and will take appropriate steps to comply. The company is also committed to perform an annual review of the effectiveness of its FSC policy, programs, and other procedures to continually improve performance.

Deba Mukherjee
CEO
Finch Paper LLC