

TEMPLATE CODE OF CONDUCT

March 2026

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1. INSTRUCTIONS

Note: This document constitutes the reference model developed as part of the Tropical Timber Trade Facility project funded by the German government. By convention, we have chosen to refer to it as the “Code of Conduct” throughout this document. This choice is not intended to be prescriptive. Each national association remains free

to adopt the title that best suits its context, whether “Code of Conduct”, “Code of Ethics” or any other term deemed appropriate.

This document is primarily intended for national associations, which are its direct recipients and the first to be affected by its implementation. It has been designed to provide them with a common framework whilst allowing them the necessary flexibility to adapt it to their local circumstances.

Step	Description
1	Choose the title of the document within the Executive Committee (Code of Conduct/Code of Ethics/Charter)
2	Gather the articles of association, the internal regulations and the existing code Check that they are compatible with your future code of conduct
3	Read the diagnostic checklists in the Appendix for each of the 10 themes
4	Complete the prioritisation matrix
5	Organise a participatory workshop with your members to validate the prioritisation matrix
6	Draft the commitments (Current situation + ambitions, in your own words)
7	Put the code to a vote at the AGM Document the decision in the minutes
8	Arrange for the formal signing by members
9	Publish the code on your website
10	Plan the first annual self-assessment Set the date for the review in 3 years’ time

2. TERMINOLOGY & CONSISTENCY WITH FOUNDING DOCUMENTS

If your organisation already has a code or charter, you can either update this document by incorporating the commitments set out in the template or create a new document using the template. In the latter case, you must ensure that any pre-existing documents likely to create redundancies or contradictions are removed.

Before adopting the document, your association must ensure that the terminology used is understood, choose a title for the document, and check for consistency with its founding documents (articles of association, internal regulations, etc.).

a) Alignment with the founding documents

PRACTICAL ADVICE			
DOCUMENT	DESCRIPTION	CHECKS TO BE CARRIED OUT	ACTION IF INCONSISTENCY
Articles of Association	A key document that explains the organisation’s purpose, rules, and membership; it gives direction for decisions and shows the long-term plan.	Check that the corporate purpose covers the engagement approach and that the sanction mechanisms provided for in the articles of association and in the code are compatible	Amending the Articles of Association prior to adoption of the Code requires a vote at the AGM
Internal Rules	A practical guide for daily work, helping	Check that the sanctions in the code are	Amend the internal regulations to incorporate

	members understand rules, make consistent decisions, and act transparently.	compatible with the exclusion procedure in the internal regulations	the sanction mechanism and the conditions for adherence to the code
Operational procedures	Step-by-step instructions for carrying out activities, making sure work runs smoothly, effectively, and according to plan.	Identify the procedures to be created or updated to ensure the code's commitments are effective	Plan the update within 6 months of adoption, appoint responsible persons

b) Key definitions

The definitions aim to ensure a common understanding of the terms used in this code of conduct. A shared terminology is essential to ensure consistency in commitments not only among members of the same association, but also among partner associations from different national contexts.

TO BE CUSTOMISED

Define here the terms used in your code of conduct that require clarification to provide greater clarity. In Appendix 2, you will find a non-exhaustive list of definitions.

PRACTICAL TIP

Have your glossary validated by your members during a participatory workshop. Jointly developed definitions are better understood, more readily adopted and more widely respected.

3. GENERAL PREAMBLE

Standard text (to be retained): Forests are home to more than half of the world's biodiversity and play an irreplaceable role in climate regulation, the water cycle and the provision of essential ecosystem services. Yet they face growing pressures: deforestation, degradation, illegal logging and land-use change.

TO BE COMPLETED

Indicate the territory or territories in which your association operates and coordinates its members, without it being necessary to specify the geographical origin of all members or products.

Standard text (to be retained): Our sector operates within a rapidly evolving regulatory framework that is tightening requirements regarding legality, traceability and sustainability at an international level. The association's members undertake to comply with all applicable legal and regulatory provisions. The key legislation applicable to our members includes, in particular:

IF APPLICABLE: Exports to the EU, US, Japan and Australia

EU Regulation 2023/1115 (EUDR) mandatory due diligence on deforestation risk; geolocation of forest plots; proof of legal and sustainable sourcing for all forest-derived products entering the EU market.

Commenté [HW1]: For me here a back up with concrete examples from Gabon or Cameroon would be very helpful. A prior written agreement for information sharing would be necessary. Other option to create generic examples.

Commenté [EC2R1]: Need to be discussed.

Commenté [HW3]: Other relevant markets as for example US, Japan, Australia with their mandatory import regulations should be also mentioned here-

[Lacey Act](#) (USA): prohibition of trade in illegally harvested timber and plant products; mandatory species identification, country of origin declaration, and implementation of a risk-based due care system.

[Clean Wood Act](#) (Japan): compliance requirement for legality verification of imported wood products; mandatory documentation confirming legal harvest from the exporting country; risk assessment for procurement

[Illegal Logging Prohibition Act](#) (Australia): prohibition of import of illegally logged timber; requirement to implement a due diligence system; mandatory record-keeping to demonstrate timber legality.

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a mis en forme : Police :Couleur de police : Gris foncé

a mis en forme : Police :11 pt, Non Gras, Anglais (Royaume-Uni)

IF APPLICABLE: [CITES species \(Appendices I, II or III\)](#)

The CITES Convention regulates international trade in endangered species (*Pterocarpus soyauxii*, etc.) through official export or import permits.

IF APPLICABLE: [FLEGT VPA with the EU](#)

The FLEGT VPA defines the bilateral legality framework for exported timber. A FLEGT licence constitutes a presumption of legality on the European market.

Click on the regulations for further information.

TO BE COMPLETED

Add the national and regional regulations applicable to your members. Moreover, stakeholders should consult the national timber legality assurance system and, where available, the corresponding legality matrix.

Standard text (to be retained): Considering these challenges, our association has decided to adopt a sectoral code of conduct. This voluntary initiative reflects our conviction that an organised and committed sector can be a force for positive change for forests, local communities and our markets. It also enables us to collectively anticipate regulatory obligations, restore the confidence of buyers and consumers, and speak with one voice in negotiations that affect us.

TO BE COMPLETED

Write your collective ambition statement: your vision for your organisation and the sector

Standard text (to be retained): By adopting this code, the signatory members commit to making progress, reporting on their efforts and actively contributing to making the tropical forest and timber sector a recognised model of sustainability.

The example below is entirely fictional (organisation, country, names, figures). It provides a practical illustration of how a national organisation might complete the three sections marked 'TO BE COMPLETED' in the Preamble. The text in bold corresponds to the standard sections of the template (to be retained). The text in regular font corresponds to what the fictional organisation has written.

Forests are home to more than half of the world's biodiversity and play an irreplaceable role in regulating the climate, the water cycle and the provision of essential ecosystem services. Yet they face growing pressures: deforestation, degradation, illegal logging and land-use change.

Association X comprises 50 member companies operating in the forested provinces of the Republic of Valdoria. The association includes forest operators, sawmills and trading-exporters, with approximately

60% of production destined for the European Union, 25% for Asian markets (China, Vietnam) and 15% for regional demand.

Our sector operates within a rapidly evolving regulatory framework, which is strengthening international requirements for legality, traceability and sustainability. The association's members are committed to complying with all applicable legal and regulatory provisions. The key legislation applicable to our members includes, in particular:

EU Regulation 2023/1115 (EU Regulation): applicable to all our members exporting to the EU. Since January 2025, each of them must provide the GPS coordinates of the plots they operate to demonstrate the absence of post-2020 deforestation. In 2024, the association organised three specific training sessions on this subject, bringing together more than 120 participants.

CITES Convention (Appendices II and III): two of our members' key species — Afrormosia (Pericopsis elata, Appendix II) and Padouk (Pterocarpus soyauxii, Appendix III) — are subject to mandatory CITES permits for export. The association runs an administrative support unit to facilitate the obtaining of these permits from the Valdoria CITES Authority.

Valdoria–EU FLEGT VPA (signed in 2019, operational since 2022): the FLEGT licence issued by the Valdoria Ministry of Forests provides a presumption of legality upon entry into the European market. In 2024, 34 of our 47 members held an active licence; the aim is to reach 100% by early 2027.

Valdoria's national regulations: Forestry Act No. XX and its implementing decrees (annual felling quotas, mandatory forest management plans); Act No. XX prohibiting the export of unprocessed logs of native species; Decree No. XX introducing a felling tax; and Standard XX.

In light of these challenges, our association has decided to adopt a sectoral code of conduct. This voluntary initiative reflects our conviction that an organised and committed sector can be a force for positive change for forests, local communities and our markets. It also enables us to collectively anticipate regulatory obligations, restore the confidence of buyers and consumers, and speak with one voice in negotiations that affect us.

Founded in XX by around ten small-scale sawmills, the Association now has 47 members representing nearly 4,200 direct and indirect jobs across the three provinces. Faced together with rising regulatory demands, tighter customs controls and growing pressure from buyers for proof of sustainability, our members voted unanimously in March 2025 to adopt this Code. We believe that our long-term commercial credibility depends on our collective ability to demonstrate, with supporting documentation, that Valdoria timber is legal, traceable and responsibly produced.

By adopting this Code, the signatory members commit to making progress, reporting on their efforts and actively contributing to making the tropical forest and timber sector a recognised model of sustainability.

Our ambition: to make the Association, by 2030, the leading forestry association in Central Africa, with 100% of its members fully compliant with the EU Timber Regulation (EUTR), holders of an active FLEGT licence and committed to a sustainability certification process. We want 'Valdoria timber' to become, on European and Asian markets, a trusted label synonymous with transparency, traceability and respect for forest communities.

4. GUIDING PRINCIPLES

The guiding principles form the ethical foundation upon which the entire code of conduct is based. They are not technical rules, but fundamental values that guide all decisions and actions of the signatory members. Their strength lies in the fact that they commit the entire organisation (the association and its members), and not just a few functions or departments.

TO BE CUSTOMISED

Define here the core values that guide your code of conduct. These principles form the ethical foundation of your collective commitment. You may choose principles from the table in [Appendix 3](#) or add any that are not listed.

5. COMMITMENTS AND AREAS FOR IMPROVEMENT

Using the matrix and the commitments tables, each organisation defines, for every selected theme, its current position and the improvement pathway it plans to pursue. This process fosters transparency and consistency, requiring an objective evaluation of practices and a clear articulation of intended progress.

- 1. Our current situation:** In a few lines, the organisation describes the practices in place, existing systems and any areas requiring attention. This description must accurately reflect operational reality.
- 2. Our commitments and ambitions:** The organisation then specifies the actions it undertakes to implement, the actions selected and the envisaged timeframe for progress. The commitments reflect a commitment to continuous improvement, proportionate to the challenges and capabilities of the organisation.

TO BE CUSTOMISED

Our current situation	Our commitments and ambitions
Level: Initial/Intermediate/Advanced	Target level: Intermediate / Advanced

Example 1: Forest planning

Current situation	Our commitments and ambitions
<i>Level: Initial</i> In a small company operating, planning largely unfolds as a response to administrative requirements. Inventories are carried out to	<i>Target level: Intermediate</i> The commitment consists in gradually reclaiming this imposed tool: formalising internal processes, stabilising data, and

comply with regulations, but their internal appropriation remains limited. Planning is often perceived as an external constraint, sometimes disconnected from operational realities and internal capacities.	strengthening internal capacities, often with external support (consultants, NGOs, development projects).
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Example 2: Traceability Chain of custody

<i>Current situation</i>	<i>Our commitments and ambitions</i>
<i>Level: Intermediate</i> In an export-oriented company, a digital traceability system is already in place. It allows compliance with baseline requirements but reveals its limits when facing increasing demands for transparency, verification, and data interoperability.	<i>Level: Advanced</i> The company engages in an upgrading process: deploying more integrated digital tools, strengthening internal audits, and entering certification processes (e.g., Chain of Custody).

PRACTICAL ADVICE: 4 rules for effective writing	
Advice	Description
1	Write in your own words <i>Commitments should reflect your reality, not a generic text. Your members should be able to relate to them.</i>
2	Be honest about your current situation <i>Don't overestimate your current level. The aim is continuous improvement.</i>
3	Set yourself SMART goals (Specific, Measurable, Achievable, Realistic, Time-bound)
4	Involve members in the drafting process <i>Organise a participatory workshop. Commitments developed collaboratively are better understood and more readily adhered to. Terminology, in particular, must be agreed upon collectively.</i>

6. GOVERNANCE OF THE CODE

a) Adoption of the Code by the association

This Code is adopted by the Association in accordance with the procedures set out in its Articles of Association and Rules of Procedure (vote by the competent body). It comes into force on the date specified in the adoption decision. Any subsequent amendments to the Code are adopted in accordance with the same procedures and brought to the attention of members.

b) Adherence to the Code by members

Adherence to the Code is formalised by the signing of this Code by the member's legal representative. Signing is restricted to active members of the Association who are up to date with their statutory obligations.

By signing the Code, the member:

- Acknowledges that they have read and understood all its provisions and annexes ;
- Assesses their level of maturity for each topic ;
- Undertakes to achieve and maintain the level defined by the association for each commitment ;
- Draws up, where necessary, an action plan where the defined level has not been achieved for a commitment, with that commitment becoming a priority until compliance is achieved.

c) Monitoring and evaluation

Monitoring is shared between the association and its members, in a spirit of transparency and mutual accountability. Several levels of monitoring are possible – the association must choose the level it adopts.

Level	Member's commitment	Association's commitment
Initial	Reporting difficulties to the association, setting up an internal reporting system	Listen and observe: identify existing practices and monitor legal and commercial requirements; establish a member feedback mechanism.
Intermediate	Complete and return an annual self-assessment form	Produce and facilitate: create the standardised form, conduct the annual survey, publish an anonymised internal report with statistics.
Advanced	Undertake an external audit or due diligence, share the certificate with the association	Promote and raise funds: refer to recognised service providers, receive and analyse the certificate, publicly promote certified members, seek co-funding and promote sector-wide recognition.

These monitoring indicators are shared: they assess both members' progress and the quality of the support provided by the association.

Indicator	Target
% of members who have completed the annual self-assessment	100%
% of members satisfied with the support provided by the association	≥ 75% (annual survey)
Production of the annual report	1 per year
Number of communication initiatives to highlight members' commitment	≥ 5 per year

To complement the monitoring and evaluation framework, the association could introduce a Best Practice Award to recognize members who demonstrate exemplary commitment to compliance, sustainability, and innovation. This award would:

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a mis en forme : Police :11 pt, Anglais (États-Unis)

- **Official recognition:** Awarded via a certificate and a visible badge that members can display on their marketing materials, bids, websites, and reports. A bilingual version (English/Chinese) could enhance usability and prestige.
- **Public visibility:** The most committed members would be highlighted on the association's website, in press releases, and at sector events, reinforcing their credibility and reputation in the market.

Based on evidence from self-assessments, external audits, and compliance reports, ensuring transparency and fairness. Members achieving "Advanced" levels across key topics could be awarded annually. By sharing best practices and exemplary initiatives, the award fosters peer learning and motivates all members to progressively improve their standards.

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GOING ONE STEP FURTHER (Proposal inspired by the Timber Score model (LCB))

Consider introducing a visible score based on self-assessment (e.g. A to E) to accompany a certificate issued by the association to members who have completed their self-assessment or audit. This score, which would be renewed periodically, would enable each member to highlight their level of commitment to their clients, in their tenders and in their marketing communications. The most committed members (Advanced level across most topics) would be publicly highlighted by the association (website, press releases, etc.)

d) Alert system & sanctions mechanism

Commenté [WH4]: please add also a proposal for award system of best practise

Breaches by members:

Any identified non-compliance must be reported to a designated person within the association, such as the Chair or the Secretary, who shall inform the Executive Committee or the Board of Directors in accordance with the Articles of Association or the internal regulations. The competent body shall assess the facts by gathering the necessary evidence and ensuring a full understanding of the situation. Before any corrective decision or sanction is taken, the association shall offer active support to the member concerned. If necessary, an action plan may be prescribed, setting out measures, responsibilities and deadlines, with regular monitoring of its implementation. The final decision, whether it concerns support, compliance or, as a last resort, a proportionate sanction, is based on all the evidence gathered, in accordance with the principles of transparency and fairness towards members.

Seriousness	Measure	Timeframe	Association's involvement
Minor*	Written warning following verification of the facts	3 months to rectify	Personalised support offered,
Serious offence*	Temporary suspension of membership	6 months to rectify	Personalised support offered, including a remedial plan developed jointly with the member.

Breaches at association level

Any identified non-compliance must be reported to a governing body of the association (executive committee or board of directors). The association undertakes to rectify the situation within a reasonable timeframe and to inform its members.

e) Review of the Code

- A full review at least every five years, with a joint assessment by members and the association, and an update of commitment levels in line with changes in the context
- Participatory process: members are consulted in advance, their feedback is taken into account, and a summary of contributions is published
- Minor amendments may be made annually to incorporate regulatory changes, with transparent information provided to all signatories
- Any substantial amendment is subject to a 30-day consultation period prior to adoption and formal adoption by the competent body.

7. DISSEMINATION OF THE CODE

The association undertakes to ensure the dissemination of this code of conduct and to promote members who are committed to it through the following actions:

TO BE CUSTOMISED	
Action	Implementation
Digital communication	Dedicated website with a public member database, code downloads and publication of any progress.
Events and media	Participation in trade fairs, organisation of conferences, relations with specialist media.
Tools for members	Provision of a communications kit (logos, printed materials, digital content, talking points) enabling members to communicate their commitment.

These actions ensure the initiative's visibility among stakeholders (professionals, consumers, the media and institutions) and highlight members' commitment.

8. APPENDICES

Appendix 1 : Definitions

TERM	OPERATIONAL DEFINITION
VPA	Voluntary Partnership Agreement (VPA): a bilateral agreement between the EU and a producer country under the FLEGT framework. Signatory countries may issue FLEGT licences recognised for import into the EU.
Forest biodiversity	The variety of plant, animal and microbial species present in a forest ecosystem, including genetic diversity and habitat diversity. Its preservation is a key criterion of FSC and PEFC certification.
Forest certification	Certification by an accredited independent body that forest management (FM) or the chain of custody (CoC) complies with a standard. Main standards: sustainability (FSC, PEFC) and legality [OLB (Bureau Veritas), VLC (BV), TLV (SCS)]).
Chain of Custody (CoC)	Chain of Custody: a system enabling the traceability of forest products to be tracked and verified at every stage of processing, from the forest to the finished product. Certified FSC-CoC or PEFC-CoC.
CITES (Appendices I, II, III)	Convention on International Trade in Endangered Species. Over 600 timber species are listed. Appendix I: trade prohibited. Appendix II: CITES permit required. Appendix III: national protection with notification.
CLIP	Free, Prior and Informed Consent. The right of communities to give or withhold their consent to activities affecting their lands before they commence. Distinct from mere consultation. Required by FSC
Local communities	People living near forest areas or depending on them for their livelihoods, cultural practices or identity. Distinct from 'indigenous peoples' depending on the context.
Deforestation	Conversion of a forest to another type of land use (crops, pasture, urbanisation). The RDUE definition: conversion after 31/12/2020 based on satellite data. Distinct from 'forest degradation'.
Forest degradation	A reduction in the quality of a forest without complete conversion, loss of biodiversity, reduction in canopy cover, and depletion of carbon stocks. Covered by certain REDD+ mechanisms but not directly by the RDUE.
Due diligence	Process for assessing and managing risks related to the legality and sustainability of forest products before they are placed on the market. Required by the RDUE, RBUE (repealed 2023), the Lacey Act, and the UK TR.
EFI — Low Impact Logging	A set of forestry harvesting techniques aimed at reducing damage to the remaining stand, soils and watercourses. Includes directional felling, track planning and residue management.
FLEGT	EU Forest Law Enforcement, Governance and Trade initiative (2003) to combat illegal logging. Includes VPA, the FLEGT licensing scheme (issued by partner producer countries and recognised by the EU) and capacity-building programmes.
FSC	An international non-profit organisation that certifies responsible forest management (FSC-FM) and chain of custody (FSC-CoC). Recognised in the most demanding markets (EU, North America, Japan).
Lacey Act (USA)	US law of 1900, amended in 2008, prohibiting trade in products derived from protected species or illegally harvested species, including timber. Mandatory declaration upon import into the United States.
MRV (carbon)	Measurement, Reporting and Verification: A standardised system for accounting for and verifying carbon emissions and removals. Required by reputable certifiers (Gold Standard, VCS/Verra, Plan Vivo).
OLB (Origin and Legality of Timber)	Bureau Veritas certification attesting to the legal origin of the timber. Entry-level certification prior to FSC or PEFC certification. Recognised by certain European buyers as evidence of due diligence.
PEFC	International non-profit organisation that certifies responsible forest management (PEFC-FM) and the chain of custody (PEFC-CoC). Recognised in the most demanding markets (EU, North America, Japan).

Indigenous peoples	Peoples defined by ILO Convention 169 or national legislation, with an ancestral connection to a territory and distinct social structures. Priority beneficiaries of CLIP in international certifications.
REDD+	Reducing Emissions from Deforestation and Forest Degradation: A UN mechanism enabling developing countries to generate carbon credits by conserving or restoring their forests.
RDUE (EU Regulation 2023/1115)	The European Union Regulation on Deforestation requires operators to prove that their products (timber, soya, cocoa, coffee, palm oil, beef, rubber and derivatives) have not contributed to deforestation after 31 December 2020.
Scope 1 / 2 / 3 carbon	GHG Protocol classification of emissions: Scope 1 = direct emissions from operations. Scope 2 = emissions associated with purchased energy. Scope 3 = indirect emissions (suppliers, transport, customers). Industrial buyers include Scope 3 in their emissions inventories.

Appendix 2: Guiding principles

Value	Our commitment
Legality	<i>To strictly comply with all applicable laws, regulations and conventions.</i>
Sustainability	<i>Ensuring a balance between economic viability, environmental conservation and social equity</i>
Responsibility	<i>Fully accept the consequences of our actions on people, ecosystems and local areas</i>
Transparency	<i>Communicating openly and honestly about our practices, sources and results.</i>
Respect	<i>Respecting the rights, dignity and knowledge of all stakeholders, particularly local communities and indigenous peoples.</i>
Integrity	<i>Acting ethically, rejecting all forms of corruption and prioritising honesty in all our relationships.</i>
Excellence	<i>Striving for the highest standards of quality and constantly seeking to improve our practices.</i>
Collaboration	<i>Working in partnership with all stakeholders to collectively strengthen the sector.</i>
Innovation	<i>Adopting new technologies and methods to promote sustainability.</i>
Colleagueship	<i>Fostering respectful and collaborative relationships by creating an environment of dialogue, sharing and goodwill in pursuit of common sustainable goals.</i>
Fair trading	<i>Rejecting any unfair commercial practices between members: no dissemination of false information about competitors, no intentional denigration of a peer's reputation or products. Competition between members must remain healthy, based on quality, innovation and transparency.</i>