

Vision

Office Depot has an overall environmental policy to buy greener, be greener and sell greener. In the 'buy greener' part of this policy we are committed to sourcing, using and selling paper products that reduce our impact on the world's forests. We published our first Environmental Paper Policy in 2004, and this policy updates and replaces the earlier version. We remain committed to using recycled fiber, supporting responsible forestry certification, with a preference for Forest Stewardship Council® (FSC) fiber, increasing supply chain transparency and growing markets for greener paper products. We remain committed to avoiding paper products from: illegal sources; forests being actively converted to non-forest use; High Conservation Value forests (unless FSC certified or progressing to FSC); genetically modified or engineered trees¹; or forests where harvesting is documented to negatively impact human rights or labor rights.

Rationale

This is a critical policy for Office Depot since paper represents our most significant and visible environmental impact. Many of our customers across the world have responsible paper policies and they want suppliers such as Office Depot to provide responsibly sourced paper, minimize risks in their supply chain, and help them pursue continuous improvement in their environmental programs. Office Depot is also committed to continuous improvement and will engage customers, suppliers and other stakeholders in implementing this policy.

Responsible Parties within Office Depot

All Office Depot Associates who buy or specify paper products are affected by this policy. Since we want to focus on our highest volume paper products first, the following Associates are most impacted:

1. Office paper merchants
2. Global sourcing merchants with control of supplies categories with high paper usage
3. Own brand managing group
4. Domestic merchants with control of supplies categories with high paper usage
5. Indirect Procurement Category Managers for marketing papers, printing papers & packaging
6. Print Production buyers

Scope

Our scope includes all paper products purchased or sold by Office Depot, with an initial focus on high volume categories such as office paper and marketing paper, and second focus on paper-based office products and delivery packaging.

Environmental Specifications

Under this policy, Office Depot Associates are responsible for buying greener paper by first avoiding products with specifications that fall under the 'Required Exclusions' listed below:

- 1. Required Exclusions²:** Office Depot will not buy paper products with these specifications:
- Bleached with elemental chlorine
 - From unknown sources
 - A supplier cannot / is unwilling to disclose the original forest source (country & region) prior to purchase
 - The integrity of the supplier, or the legality of their fiber is in doubt
 - The integrity of the suppliers documentation or certification is in doubt
 - From unwanted sources not covered by an FSC Controlled Wood risk assessment or FSC certification:
 - From High Conservation Value Forests (HCVF) as defined in the HCVF Global Toolkit
 - From illegally-logged sources, or regions where there is a high degree of suspected illegal logging
 - From natural forests being actively converted to non-forest use
 - From genetically modified or engineered trees
 - Where harvesting or processing is documented to negatively impact human rights or labor rights
 - From high risk suppliers or regions associated with unknown or unwanted sources listed above.

¹ Genetic modification refers to engineering/modifying a tree's genetic makeup/genome by introducing genes or removing/suppressing some of the trees genetic material.

² The only scenario in which paper falling under these Required Exclusions may be purchased is when the supplier is working under a formal agreement with a credible Conservation Group to resolve forestry issues, and the Office Depot Environmental Strategy team is actively involved.

Then, Office Depot Associates are responsible for ensuring 'Minimum Requirements' / Pre-requisites listed below are met.

2. Minimum Requirements / Pre-requisites: The following specifications are minimum requirements / pre-requisites:

- Virgin fiber certified under one or more of these forest certification schemes
 - American Tree Farm System (ATFS)
 - FSC controlled wood
 - Sustainable Forestry Initiative (SFI)
 - PEFC (Program for Endorsement of Forest Certification) and other standards accepted by PEFC
- If certified as above, Chain of Custody certificates for fiber will need to be provided or evidence of compliance with certified sourcing programs.
- If not certified as above, documented to be legal and traceable to an original forest source that is not high risk (unwanted/unknown/high risk suppliers), and legal origin can be verified prior to purchase with credible documents
- If a recycled content claim is made, the minimum requirement is 10% post consumer recycled or 20% total recycled content for most of the world. For Europe the minimum requirement is 30% total recycled content.
- Recycled percentage claim verified by credible third party, or at minimum with a signed affidavit
- Elemental Chlorine Free (ECF), or if possible Enhanced Elemental Chlorine Free (EECF), Processed Chlorine Free (PCF) or Total Chlorine Free (TCF) bleaching

After Required Exclusions & Minimum Requirements are met, Associates are asked to maximize sourcing of greener papers, from our 'light green' to 'mid green' to 'dark green specifications as quickly as feasible.

3. Office Depot 'Light Green' Specification:

- FSC Mix Sources (with 0% post consumer recycled content), or
- Contains 10%-29% post consumer recycled content
- Recycled percentage claim verified by credible third party, or at minimum with a signed affidavit
- For papers with recycled content, remaining virgin fiber from FSC certified sources preferred

4. Office Depot 'Mid Green' Specification:

- Contains 30%-89% post consumer recycled content
- Recycled percentage claim verified by credible third party, or at minimum with a signed affidavit
- Remaining virgin fiber from FSC certified sources preferred
- Made with 30% - 100% agricultural / plant-based fibers e.g. sugarcane bagasse, bamboo, kenaf or wheat straw but without evidence of sustainable agriculture e.g. USDA Organic or FSC or Rainforest Alliance certification
- If made with agricultural / plant-based fibers, non-food fibers and agricultural waste preferred

5. Office Depot 'Dark Green' Specification:

- Contains 90% - 100% post consumer recycled content
- Recycled percentage claim verified by credible third party, or at minimum with a signed affidavit
- Remaining virgin fiber from FSC certified sources preferred
- Made with 70% - 100% agricultural / plant-based fibers e.g. sugarcane bagasse, bamboo, kenaf or wheat straw and with evidence of sustainable agriculture e.g. USDA Organic or FSC or Rainforest Alliance certification
- If made with agricultural / plant-based fibers, non-food fibers and agricultural waste preferred

Implementation Tracking & Reporting

Office Depot publicly released this policy in Q1 2013. Improvement targets will be set for high volume paper categories first, with an intention to add further categories as new data is gathered from vendors and across regions. These targets and progress towards them will be communicated e.g. in the Annual Office Depot Corporate Citizenship Report.

Implementation Procedures & Training

Detailed guidance on implementation procedures will be provided during training sessions scheduled for Office Depot Associates and vendors.