



# Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ  
Evaluation of  
Granules Combustibles Energex inc.

NCR-verification audit

Sustainable Biomass Program  
[sbp-cert.org](http://sbp-cert.org)





## Completed in accordance with the CB Public Summary Report Template Version 2.0

For further information on the SBP Framework and to view the full set of documentation see [www.sbp-cert.org](http://www.sbp-cert.org)

### Document history

**Version 2.0**

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## 1 Overview

|                                      |                                                               |
|--------------------------------------|---------------------------------------------------------------|
| <b>Certification Body (CB) Name:</b> | Preferred by Nature OÜ                                        |
| <b>Primary CB contact for SBP:</b>   | Pilar Gorria Serrano                                          |
| <b>Primary CB contact email:</b>     | pgorria@preferredbynature.org                                 |
| <b>Audit team leader:</b>            | Lennart Holm                                                  |
| <b>Audit team members:</b>           | -                                                             |
| <b>Name of the Company:</b>          | Granules Combustibles Energex inc.                            |
| <b>Company legal address:</b>        | 3891 Président Kennedy, G6B 3B8 Lac-Mégantic (Québec), Canada |
| <b>Company contact for SBP:</b>      | Alain Perreault                                               |
| <b>Company contact email:</b>        | aperreault@lignetics.com                                      |
| <b>Company website:</b>              | <a href="https://energex.com">https://energex.com</a>         |
| <b>Date of installation:</b>         |                                                               |
| <b>SBP Certificate Code:</b>         | SBP-08-39                                                     |
| <b>Date of certificate issue:</b>    | 25 May 2021                                                   |
| <b>Date of certificate expiry:</b>   | 24 May 2026                                                   |
| <b>Audit closing meeting date:</b>   | 08 Oct 2025                                                   |
| <b>Audit cycle:</b>                  | NCR-verification audit                                        |

## 2 Audit conclusions

### 2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:

|                                                        |                        |
|--------------------------------------------------------|------------------------|
| <b>Certification decision:</b>                         | Certification approved |
| <b>Certification decision by (name of the person):</b> | Mikhail Rai            |
| <b>Date of decision:</b>                               | 13 Oct 2025            |
| <b>Other comments:</b>                                 | N/A                    |

### 2.2 Open non-conformities and observations

| NC number 6538 copied from 5505 NC Grading: Minor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | SBP Standard 2: Feedstock Verification v2.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1.1.3 The Organisation shall include a description of all operators involved in the production, harvesting and transport of feedstock and having an impact on conformance with SBP standards, including at least the following: – company names, – addresses of operating sites, – key contact person, – status of certification against SBP-recognised scheme (where relevant), and – stages within the feedstock supply chain from the sourcing area up to and including the Organisation's own operations.<br>N/A<br>N/A<br>N/A |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| During the audit, the BP has not prepared a description of all operators involved in the production, harvesting and transport of feedstock and having an impact on conformance with SBP standards, including at least the following: • company names, • addresses of operating sites, • key contact person, • status of certification against SBP-recognised scheme (where relevant), and • stages within the feedstock supply chain from the sourcing area up to and including the Organisation's own operations. Major NC is issued. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | By the next surveillance audit, but no later than 12 months from report finalisation date                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Open                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| NC number 6539 copied from 5507 NC Grading: Minor |                                             |
|---------------------------------------------------|---------------------------------------------|
| <b>Standard:</b>                                  | SBP Standard 2: Feedstock Verification v2.0 |

|                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Requirement:</b>                                                                                                                                                            | 7.4 The Organisation shall ensure that the RMP identifies: a. to whom in the Supply Base the RMMs applies, to address all specified risks; b. the timeframe by when the RMMs shall be implemented; and c. the Means of Verification of the effectiveness of the RMMs to reduce the risk rating to low risk.<br>N/A<br>N/A<br>N/A |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                    |                                                                                                                                                                                                                                                                                                                                  |
| The BP has not identified in the RMP (SBR/ ProcessusMesuresAttenuation-GestionRisquesEnergex.docx) b. the timeframe by when the RMMs shall be implemented. Minor NC is issued. |                                                                                                                                                                                                                                                                                                                                  |
| <b>Timeline for Conformance:</b>                                                                                                                                               | By the next surveillance audit, but no later than 12 months from report finalisation date                                                                                                                                                                                                                                        |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                               | N/A                                                                                                                                                                                                                                                                                                                              |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                    | N/A                                                                                                                                                                                                                                                                                                                              |
| <b>NC Status:</b>                                                                                                                                                              | Open                                                                                                                                                                                                                                                                                                                             |

| NC number 6540 copied from 5508                                                                                                                     |                                                                                                | NC Grading: Minor |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-------------------|
| Standard:                                                                                                                                           | SBP Standard 2: Feedstock Verification v2.0                                                    |                   |
| Requirement:                                                                                                                                        | 7.6 The RMP shall be signed off by senior management in the Organisation.<br>N/A<br>N/A<br>N/A |                   |
| Description of Non-conformance and Related Evidence:                                                                                                |                                                                                                |                   |
| RMP (SBR/ ProcessusMesuresAttenuation-GestionRisquesEnergex.docx) has not been signed by senior management in the Organization. Minor NC is issued. |                                                                                                |                   |
| Timeline for Conformance:                                                                                                                           | By the next surveillance audit, but no later than 12 months from report finalisation date      |                   |
| Evidence Provided by Company to close NC:                                                                                                           | N/A                                                                                            |                   |
| Findings for Evaluation of Evidence:                                                                                                                | N/A                                                                                            |                   |
| NC Status:                                                                                                                                          | Open                                                                                           |                   |

|                                        |                                                                                                                                      |                          |
|----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| <b>NC number 6541 copied from 5509</b> |                                                                                                                                      | <b>NC Grading: Minor</b> |
| <b>Standard:</b>                       | SBP Standard 4: Chain of Custody v2.0                                                                                                |                          |
| <b>Requirement:</b>                    | 1.24 The Organisation shall maintain an up-to-date self-assessment covering the implementation of 1.21, 1.22 and 1.23.<br>N/A<br>N/A |                          |

|                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                 | N/A                                                                                       |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                     |                                                                                           |
| The BP has completed a self-assessment of its compliance to laws and regulations related to health & safety, anti-harassment, anti-corruption, environment, gender equity and commitment towards people and indigenous peoples' rights. (Auto-Evaluation lois et règlements Energex.pdf). However, it does not comply to SBP's Guidance for this requirement (see Guidance for Standard 4). Minor NC is issued. |                                                                                           |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                                | By the next surveillance audit, but no later than 12 months from report finalisation date |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                                                | N/A                                                                                       |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                     | N/A                                                                                       |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                               | Open                                                                                      |

## 2.3 Closed non-conformities

| NC number 6542 copied from 5787 NC Grading: Major           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Standard:</b>                                            | SBP Standard 2: Feedstock Verification v2.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Requirement:</b>                                         | 7.1 The Organisation shall develop a Risk Management Plan (RMP) which includes Risk Management Measures (RMMs) for each Indicator rated as specified risk within its SBE per the Organisation's Risk Assessment or an SBP-endorsed RRA with the objective to mitigate the risk and reduce the risk rating to low risk.<br><br>N/A<br>N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Description of Non-conformance and Related Evidence:</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Timeline for Conformance:</b>                            | 3 months from the report finalisation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Evidence Provided by Company to close NC:</b>            | Energex proposed solution: 1- determine the proportion of volume sourced from private woodlots with low risk. 1a - Volume of fibre sourced from private woodlots with low risk will be considered as SBP Compliant Feedstock 2- Depending on the specified risk, determine if field visits are necessary. For example, with documented evidence there is no sourcing from IFL or from Caribou habitat. 3- Ensure field visits are documented and reviewed 4- Assess and ensure woodlot owners and contractors have access to training material and resources. 5- Define corrective actions where necessary. In support of the above, Energex will: - will coordinate with Marketing Board of Southern Quebec to ensure field visits assess if harvests were in conformance with BMPs and appropriately addressed specified risks defined by SBP RRA Qc - marketing boards and private regional agencies - document content of their training sessions - Highlight strengths and weaknesses of training sessions - communicate conclusions and identify potential improvements - promote BMPs and training resources to woodlot owners and contractors through suppliers and relevant partners |
| <b>Findings for Evaluation of Evidence:</b>                 | The review of evidences provided, support closing of the NC. - Sampling methodology and intensity as described is acceptable. - Evidence of conformance - Field visit completed forms reviewed. These provide additional evidence of actual field visits and evaluation has been taken place. 2025 next steps as proposed by Energex are acceptable: - Collaborate with marketing board from southern Quebec to ensure field visits assess SBP RRA Quebec specified risks. - Assess training offered to woodlot owners and contractors to highlight potential improvements to Marketing Boards and Regional Agencies. - Disseminate BMP training resources through Energex's suppliers. In consideration of the above, Major NC is hereby closed.                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>NC Status:</b>                                           | Closed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

## 2.4 Actions taken by Organisation Prior to Report Finalisation

The Organisation implemented corrective measures addressing the Major NCR related to the Risk Management Plan. Evidence reviewed demonstrated that mitigation measures are in place and functioning as intended. While the mitigation measures remain of the same general nature as previously, the Organisation has established closer collaboration with the Marketing Board of Southern Quebec and initiated field verification at the monitoring

and outcome levels. For this reason, the Supply Base Report has temporarily remained unchanged, with the expectation that it will be revised to fully reflect these developments before the next surveillance audit.

#### **2.5 Notes for the next Audit**

The updated SBR shall reflect the implemented collaboration with the Marketing Board of Southern Quebec and the integration of field verification at the monitoring and outcome levels. All supporting documentation, including the revised Risk Management Plan, SAR, procedures, and mass balance account, must be submitted in advance of the next audit. Late or post-audit submissions will not be accepted for review or approval.

### 3 Specific objective of the audit

The specific objective of this evaluation was to close the Major NC issued during the surveillance audit.

## 4 Evaluation process

### 4.1 Timing and duration of evaluation activities

| Audit Level of Effort (LoE)    |              |               |
|--------------------------------|--------------|---------------|
| Activity                       | Auditors     | Auditor hours |
| 2. On-site (excl. travel time) | Lennart Holm | 3.0           |
| 3. Report writing              | Lennart Holm | 4.0           |

### 4.2 Auditor team qualification

| Auditor qualification |         |                                                                                                                             |
|-----------------------|---------|-----------------------------------------------------------------------------------------------------------------------------|
| Auditor name          | Role    | Qualification                                                                                                               |
| Lennart Holm          | Auditor | Lead SBP, GGL, SDE+, ENplus and FSC, SFI and PEFC FM/COC auditor and successfully passed the SBP auditor training programme |

### 4.3 Description of evaluation activities

This NCR verification audit was conducted remotely on October 8, 2025, to evaluate the effectiveness of corrective actions implemented in response to the Major NCR issued during the surveillance audit. The remote approach was deemed appropriate as the verification focused on system-level improvements rather than direct observation of mitigation outcomes.

The verification was based on the review of updated documentation, including the revised Risk Management Plan, sampling methodology, field visit records, and communication materials developed in collaboration with the Marketing Board of Southern Quebec. The audit confirmed that all specified risks identified under the SBP-endorsed RRA for Quebec are now addressed within the Organization's system through structured monitoring and follow-up procedures.

The evaluation was designed to verify the functionality and effectiveness of the management system rather than the implementation of individual Risk Management Measures. This approach ensured that the overall framework supporting risk mitigation aligns with the requirements of the SBP RRA for Quebec and provides a sound basis for their consistent application.