



# Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ  
Evaluation of Geminor Fin Oy

Main (Initial) Audit

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





## Completed in accordance with the CB Public Summary Report Template Version 2.1 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

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 | Published 10 August 2023 |
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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>          | Geminor Fin Oy                            |
| <b>Company legal address:</b>        | Teknobulevardi 3-5, 01530 Vantaa, Finland |
| <b>Company contact for SBP:</b>      | Tadesse Negash                            |
| <b>Company contact email:</b>        | tadesse.negash@geminor.no                 |
| <b>Company website:</b>              |                                           |
| <b>Date of installation:</b>         |                                           |
| <b>SBP Certificate Code:</b>         | SBP-15-01                                 |
| <b>Date of certificate issue:</b>    | 22 Oct 2026                               |
| <b>Date of certificate expiry:</b>   | 21 Oct 2031                               |
| <b>Audit closing meeting date:</b>   | 01 Sep 2026                               |
| <b>Audit cycle:</b>                  | Main (Initial) 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>                                                                              | Pilar Gorria           |
| <b>Date of decision:</b>                                                                                                            | 23 Sep 2026            |
| <b>Other comments:</b>                                                                                                              | N/A                    |

### 2.2 Open non-conformities and observations

| NC number 9672                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  | NC Grading: Observation                                                                                                                                                                                                                                                                                                                                                                                                          |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Standard:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  | SBP Standard 4: Chain of Custody v2.0                                                                                                                                                                                                                                                                                                                                                                                            |  |
| Requirement:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  | 1.10 The Organisation shall conduct an internal audit, not later than 12 months after the preceding audit (internal or external) for the purpose of evaluating the Organisation's conformance with SBP requirements, considering the size and scope of the Organisation and certificate. Note: An internal audit is not required to be conducted before the external initial certification audit by the CB.<br>N/A<br>N/A<br>N/A |  |
| Description of Non-conformance and Related Evidence:                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |
| Internal audit requirements are defined in section 2.5 of the Sustainable Biomass Programme Trader Management Procedures in Exhibit 1, thus have procedures in place to conduct internal audits. Internal audits of Geminor as a trader in FSC and PEFC were done on July 3, 2026, Internal audit done by internal resources who were not auditing their own work. However, the company must be aware of the requirement to conduct an internal audit of the SBP system no later than 12 months after this external audit. |  |                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |
| Timeline for Conformance:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| Evidence Provided by Company to close NC:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| Findings for Evaluation of Evidence:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| NC Status:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  | Open                                                                                                                                                                                                                                                                                                                                                                                                                             |  |
| Original Due Date:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| Closing Date:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| Upgrade Date:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| Update Date:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                              |  |

| NC number 9674   |                                       | NC Grading: Observation |
|------------------|---------------------------------------|-------------------------|
| <b>Standard:</b> | SBP Standard 4: Chain of Custody v2.0 |                         |

|                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                   |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                                      | 1.29 A signed and enforceable agreement shall exist between Organisation and subcontractors.<br>N/A<br>N/A<br>N/A |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                   |
| Agreements between Geminor and the subcontractors exist and are duly signed, and an additional agreement will be signed prior to the actual starting of the outsourced activities for SBP. A template has been created for outsourced activities under SBP, thus the company must be aware of this requirement to sign this agreement prior to the actual starting of the outsourced activities. An OBS has been raised. |                                                                                                                   |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                                         | N/A                                                                                                               |
| <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                                                                                                              |
| <b>Original Due Date:</b>                                                                                                                                                                                                                                                                                                                                                                                                | N/A                                                                                                               |
| <b>Closing Date:</b>                                                                                                                                                                                                                                                                                                                                                                                                     | N/A                                                                                                               |
| <b>Upgrade Date:</b>                                                                                                                                                                                                                                                                                                                                                                                                     | N/A                                                                                                               |
| <b>Update Date:</b>                                                                                                                                                                                                                                                                                                                                                                                                      | N/A                                                                                                               |

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## 2.2 Closed non-conformities

## 2.3 Actions taken by Organisation Prior to Report Finalisation

None

## 2.4 Notes for the next Audit

Verify transactions in DTS

### 3 Scope of the audit and SBP certificate

| Scope item                                                                                                                                                              | Check all that apply to the Certificate scope                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Primary activity                                                                                                                                                        | Trader                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Secondary activity                                                                                                                                                      | Trader                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Approved Standards                                                                                                                                                      | SBP Standard 4: Chain of Custody v2.0; SBP Standard 5: Collection and Communication of Data v2.0; Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413; Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1                                                                                                                                                                |
| Product Group IDs                                                                                                                                                       | <input type="checkbox"/> Forest feedstock (1A)<br><input type="checkbox"/> Trees outside forest (TOF) - Urban and landscape feedstock (2A)<br><input type="checkbox"/> Trees outside forest (TOF) - Agricultural land feedstock (3A)<br><input type="checkbox"/> Processing residues feedstock (4A)<br><input type="checkbox"/> Post-consumer feedstock (5A)<br><input checked="" type="checkbox"/> Other (please specify)<br>woodchips or pellet |
| SBP Feedstock types                                                                                                                                                     | <input checked="" type="checkbox"/> SBP Compliant; <input checked="" type="checkbox"/> SBP Controlled                                                                                                                                                                                                                                                                                                                                             |
| Includes Supply Base Evaluation (SBE)                                                                                                                                   | No                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Includes EU RED Scheme                                                                                                                                                  | No                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Includes EU RED Supply Base Evaluation (SBE)                                                                                                                            | No                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Products                                                                                                                                                                | WB 1.1 Wood pellets, WB 2.1 Wood chips                                                                                                                                                                                                                                                                                                                                                                                                            |
| Feedstock origin (countries):                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| SBP-endorsed Regional Risk Assessments used:                                                                                                                            | Not applicable                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Public link:<br><a href="https://sbp-cert.org/documents/standards-documents/risk-assessments/">https://sbp-cert.org/documents/standards-documents/risk-assessments/</a> |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Chain of custody system                                                                                                                                                 | <input type="checkbox"/> Physical separation<br><input checked="" type="checkbox"/> Mass balance                                                                                                                                                                                                                                                                                                                                                  |
| Outsourcing                                                                                                                                                             | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Changes in the scope                                                                                                                                                    | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                               |

### 3.1 Description of the company

*Guidance: Please describe the type, structure and operations of the company including its role in the supply chain, its inputs and outputs as they related to SBP Standards.*

Geminor is an international resource management company with HQ in Norway, supported by permanent offices in the UK, Finland, Denmark, Sweden, Italy, Poland, Germany, and France. Geminor AS was first established in 1994 as a waste entrepreneur company serving the market with shredding and treatment of waste and waste wood. Geminor AS focused on this part of the market until 2004. The scope of the SBP certificate for Geminor Fin Oy includes purchasing and selling SBP Certified woodchips and pellets with physical possession using a Mass Balance accounting system. The company manages certification through Landax and GemirSoft, which ensures that the process follows established procedures and routines in a highly visual and structured way. The company also have both PEFC and FSC Chain of Custody certificates.

### 3.2 Site details

| Legal entity name | Address                                           | Site Activity | Visited during the audit            |
|-------------------|---------------------------------------------------|---------------|-------------------------------------|
| Geminor Fin Oy    | Teknobulevardi<br>3-5. 01530<br>Vantaa. Finland   | Trader        | <input checked="" type="checkbox"/> |
| Port of Loviisa   | Satamatalonkuja<br>1 FI-07910<br>VALKO<br>FINLAND | Storage       | <input type="checkbox"/>            |

### 3.3 Detailed description of the Chain of Custody system and Product Groups

*Guidance: Please describe the operation of the CoC system including details of the mass balance management and a list of established Product Groups.*

The overall written SBP procedures covers trade and transportation of biomass as well as storage of the traded biomass. The point of purchase varies, and can be FOB, EXW at the biomass production facility. The scope of the certificate includes the use of outsourced storage facilities used for storage of SBP pellets at the port of Loviisa. While stored at storage sites, the SBP material is physically separated from non-eligible input in separate storage areas. The Organisation has opted to have the ability to mix SBP feedstock product groups during the storage and trading processes and is using the mass balance system for that. Written procedures has been developed to ensure the implementation of all elements of the mass balance requirements. and the mass Balance account can handle each Product Group and per claim..

## 4 Specific objective of the audit

The specific objective of this main assessment was to confirm that the Organisation's management system is effectively implemented and maintained in accordance with SBP Version 2 requirements applicable to traders, including EU RED Bridging requirements and the operation of a mass balance system, as well as outsourced activities. The evaluation aimed to verify compliance with SBP Chain of Custody and data requirements, including activities performed by subcontractors.

The scope of the evaluation covered

- Review of the BP's management procedures, including requirements designated in applicable SBP Standards and Instruction Documents;
- Review of SBP system control points, analysis of the existing FSC and PEFC CoC system;
- Review of the records and calculations and pertinent evidences.
- Interviews with responsible staff;
- EU RED III requirements

## 5 Evaluation process

### 5.1 Timing and duration of evaluation activities

| Audit Level of Effort (LoE)    |              |               |
|--------------------------------|--------------|---------------|
| Activity                       | Auditors     | Auditor hours |
| 1. Preparation                 | Lennart Holm | 2.0           |
| 2. On-site (excl. travel time) | Lennart Holm | 8.0           |
| 3. Report writing              | Lennart Holm | 5.0           |
| 4. Other                       | Lennart Holm | 4.0           |

### 5.2 Auditor team qualification

| Auditor qualification |              |                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Auditor name          | Role         | Qualification                                                                                                                                                                                                                                                                                                                                              |
| Lennart Holm          | Lead Auditor | Lennart has over 25 years of auditing experience in Forest Management; Chain of Custody, SBP, GGL, Enplus and SDE+ audits, for various CBs. Lead SBP, ENplus, GGL, SDE+ and FSC, PEFC and SFI FM/COC auditor, as well as ISO9001 and ISO14001 lead auditor, and successfully passed the SBP auditor training program for V2 and V2.1 of the SBP standards. |

### 5.3 Description of evaluation activities

This main assessment audit occurred on September 1, 2026. The audit was conducted on-site at Geminor FIN Oy office in Vantaa, Finland. The audit consisted of an opening meeting, during which the scope was confirmed. The auditor also explained the methods to be employed during the audit. During the audit, all relevant requirements of the applicable SBP standards were verified on compliance through the use of a report template and checklists, as well as interviews with staff were made. Additionally, a sample of records to verify compliance with the applicable SBP standards were made.

A key part of the assessment was the evaluation of the management system for STD 4 and EU RED III requirements. The audit was completed by filling in the audit checklist and discussing the audit results.

This report is the result of the findings of an audit carried out by an independent lead auditor. The purpose of the assessment was to assess the client's compliance with the standards used within the scope of the certificate.

A sufficient amount of people were interviewed during the site and field visits, where names withheld due to Data Protection Legislation

Critical Control points were evaluated and found to be sufficiently well managed and controlled.

A closing meeting was conducted where auditor summarized scope change audit conclusions and next steps where clarified.

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#### 5.4 List of forest management units and feedstock suppliers visited

- ☒ N/A – No forest sites or suppliers visited during this evaluation  
Geminor is a trader, with no current trades to verify or suppliers to visit.

#### 5.5 Describe audit sampling methodology used

Since this was main assessment and no material has been traded as SBP certified, no DTS transactions were assessed. The storage sites at the port of Loviisa was visited remotely. All applicable and existing documents and procedures subject to the applicable SBP requirements were reviewed. All relevant staff were interviewed

#### 5.6 CB stakeholder engagement

- ☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

*Guidance: Please specify the number and types of stakeholders engaged, method of engagement and its outcomes.*

Certification Body stakeholder consultation was not applicable for this evaluation

The country managers are responsible for Stakeholder engagement for the company. Stakeholder Lists, Stakeholder Engagement Plans & Preliminary Impact Assessments specifically for Geminor Finland and Geminor Denmark are found in Landax and Appendix 1 of the Sustainable Biomass Programme Trader Management Procedures..

Geminor remains available for stakeholder enquiries at all times - including the possibility for customers or any other stakeholder to state complaints applicable to the SBP scope of Geminor.

#### 5.7 Stakeholder feedback and response

- ☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

No comments received.

#### 5.8 Main strengths and weaknesses of the management system and operations

Strengths: The audit of Geminor FIN demonstrated a good level of compliance with the required criteria of Standards 4 and 5, and the EU RED requirements. There was reasonable evidence provided to support compliance where a Non-Conformity was not detected.

The existence of FSC and PEFC Chain of Custody system in combination with ISO 9001, ISO 14001 and ISO 45001 are considered a main strength with respect to Geminor's overall conformity with the relevant SBP standards.

Weaknesses: No weaknesses detected

## 5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☑ N/A – Standard 1 not in the scope of the evaluation

## 5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED

☑ N/A – processing residues and/or post-consumer feedstock not used.

## 5.11 Summary of evaluation activities for chain of custody system per Standard 4

Geminor has developed and implemented Chain of custody system according Standard 4 requirements, including Business Integrity self assessments and produced a Stakeholder Engagement Plan

The Organization has implemented the requirements as defined in the SBP Standard 4. The CoC system is quite straight forward, no mixing of produced SBP Certified with non-compliant biomass is accepted before sale to customers. The Organization has procedures in case of doubts or unclarities if non-controlled biomass has entered the production facility, which include a quarantine of the material in question until its status can be verified.

For EU RED III scope, Geminor implements a mass balance system with three months balancing period.

## 5.12 Summary of evaluation activities for collection and communication of data per Standard 5

Geminor will transfer sustainability, energy and GHG data primarily through the DTS (Radix Tree) system, supported by upstream SAR data from Biomass Producers and SREG data where applicable. Procedures are in place to ensure completeness and accuracy of data prior to acceptance and re-sharing.

The organisation demonstrated adequate knowledge about the collection and communication of energy and GHG data, and the system is considered sufficient for downstream calculations by other actors.

## 5.13 Summary of audit findings for competency of involved personnel

Staff members involved into the SBP system management and implementation, include the external consultant, Sustainable Biomass Coordinator, Operations Manager and Development Manager as well as Geminor corporate support staff. Interviewed staff demonstrated awareness of their responsibilities within SBP system. The development of the SBP Management System, and the implementation of the SBP certification process was assigned to an external consultant as well as the company's technical team, which consist of managers with a solid background in commodity trade with many years of experience.

## 5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)

☑ N/A – Standard 6 not in the scope

## 6 Detailed evaluation of BP's Supply Base Evaluation (if applicable)

☒ N/A – Supply Base Evaluation not in the scope of the evaluation

### 6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope

N/A

### 6.2 CB evaluation of specified risk indicators and mitigation measures