

Modern Slavery Statement

For the year ended 30 June 2021

Introduction

This statement outlines the actions taken by the OneFortyOne Group to identify and mitigate modern slavery risks in our business and supply chains, over the year ended 30 June 2021 (**FY2021**). This statement has been prepared to comply with the requirements of Sections 14 and 16 of the *Modern Slavery Act 2018* (Cth). This statement is provided by OneFortyOne Plantations Holdings Pty Ltd (ACN 159 689 942) of Level 1, 636 St Kilda Road Melbourne Victoria 3004 (**OneFortyOne**, a reporting entity within the meaning of the Act) and covers the following other reporting entities in the OneFortyOne Group:

OneFortyOne Plantations Holdings No. 2 Pty Ltd (ACN 621 554 890)

OneFortyOne Plantations Pty Ltd (ACN 159 689 988)

OneFortyOne Wood Products Pty Ltd (ACN 621 555 682)

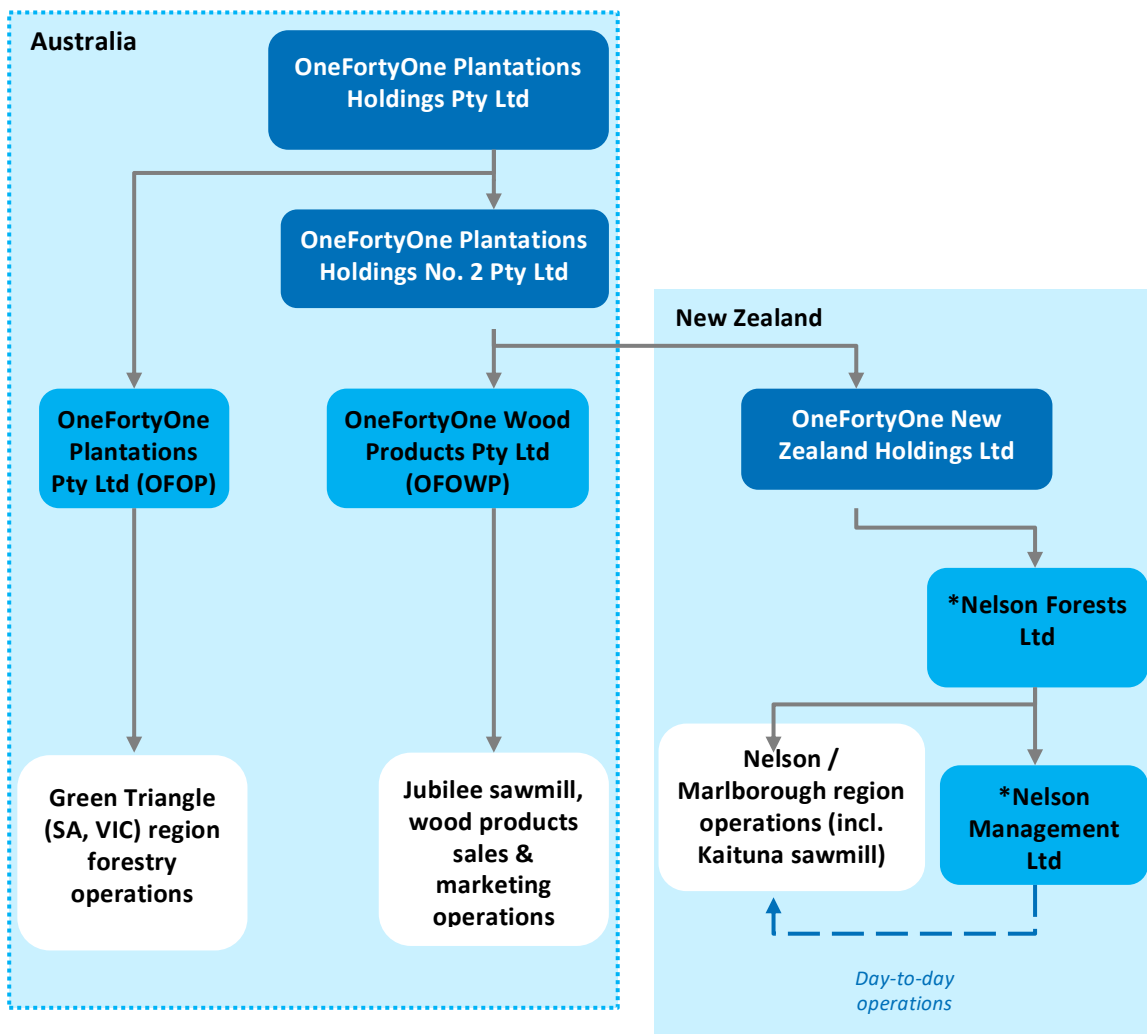
OneFortyOne is committed to operating responsibly and establishing and adhering to the highest ethical standards across our Group. We will not tolerate any forms of modern slavery in our business.

Our Business

OneFortyOne is a vertically integrated, trans-Tasman business with forests and sawmills in Australia and New Zealand. We proudly grow the ultimate renewable resource, harvesting and replanting millions of pine trees each year. Our products are used every day, including structural timber for housing construction.

OneFortyOne is majority owned by Australian superannuation and sovereign wealth funds. In the Green Triangle, we operate and manage 82,000 hectares (ha) of plantation area with most of our forests subject to a 105-year lease with the South Australian Government. We also own the Jubilee sawmill, one of the largest sawmills in Australia and the largest private employer in Mt Gambier, with approximately 360 direct employees and over 400 contractors. We are one of several forest owners and managers in the Green Triangle (**GT**) region.

In New Zealand OneFortyOne owns and operates almost 80,000 hectares of plantation forest in the Nelson Tasman and Marlborough regions. We also own and operate Kaituna Sawmill in the Marlborough region. We directly employ almost 120 people in New Zealand as well as support more than 300 contractors and suppliers.



* On 1 July 2021 Nelson Forests Limited and Nelson Management Ltd were amalgamated with Nelson Forests Limited continuing as the amalgamated company under the new name 'OneFortyOne New Zealand Limited'.

Operations and Supply Chain

OneFortyOne considers the risk of modern slavery within its operations to be low. However, OneFortyOne recognises through its supply chain it could be indirectly exposed to the risk of modern slavery practices.

OneFortyOne's worksites are located in Australia and New Zealand. Our manufacturing facilities are covered by either an enterprise bargaining agreement or a collective bargaining agreement. These agreements appropriately cover usual matters such as wages, overtime, allowances, leave and redundancies. OneFortyOne engages with the CFMEU, an Australian industry employee trade union, in respect of represented Australia employees and First Union, a New Zealand industry employee trade union, in respect of represented New Zealand employees. There have been no disputes with any trade unions involving any modern slavery type allegations. OneFortyOne's other employees are employed under and in compliance with relevant industry awards or individual contracts. No Australian employees are temporary visa workers. In New Zealand, we have 6 temporary visa workers employed under our collective bargaining agreement at Kaituna sawmill.

Our supply chain is made up of a large number of third-party providers many of which are small and medium sized enterprises but also include multinational corporations. We procure a range of goods, from uniforms and PPE through to timber milling equipment, and engage a range of service providers to perform harvesting, silviculture, forest road maintenance, export log marketing, engineering, maintenance, transport, and logistics. The majority of suppliers are located in Australia and New Zealand, with a smaller portion based in the US and Canada.

As reported in our FY2020 Modern Slavery Statement, OneFortyOne has performed a risk assessment of our tier 1 suppliers against known modern slavery risk factors relating to sectors, products and business models. This risk assessment identified the following procurement areas as being of potentially higher risk in terms of modern slavery practices: seasonal labour-hire arrangements; raw materials (wood chips); export sales and marketing services; cleaning and security at our sites; IT services and equipment; and the purchase of PPE. No new higher risk categories have been identified since that initial risk assessment.

Our assessment process continues to review the geographical profile of our tier 1 supplier base using the Global Slavery Index 2018 and we have not found there to be any material exposure to suppliers who are based in countries that have a high risk of modern slavery. We acknowledge that some of our tier 1 suppliers may source products from higher risk geographies (such as China) and / or subcontract services and we are committed to expanding our analysis to tier 2 suppliers in future years as our we continue to develop our modern slavery risk management program.

Managing Modern Slavery Risks

Governance

The OneFortyOne Board has responsibility for governance and oversight of modern slavery risks and approval of this statement. OneFortyOne has a risk management policy and framework in place in order to identify and manage risks that impact or threaten to adversely impact our business, customers, people, assets and the public. The Board is responsible for ensuring that the Executive Leadership Team manages risk effectively and the Board Audit and Risk Committee oversees risk management activities. OneFortyOne's senior management ensures that the Board is adequately informed of significant risk management activities and mitigating actions to manage risks on a regular basis.

Supplier engagement and management

The majority of OneFortyOne's suppliers are well reputed local companies, with which OneFortyOne has had regular and close dealings over a long period of time. Suppliers working at OneFortyOne's operated assets are required to comply with our health, safety and environmental standards and fair employment practices.

In FY2021 OneFortyOne developed a revised procurement policy, principles and guidelines which seeks to embed the consideration of modern slavery risk factors during the supplier selection process in addition to our typical due diligence on suppliers. Modern slavery training and awareness sessions were also conducted for our employees involved in procurement and the supervision of suppliers and contractors in higher risk categories. OneFortyOne has not discovered any modern slavery concerns within its due diligence on suppliers to date.

OneFortyOne has a centralised risk assessment process for new contracts and continues to implement modern slavery clauses in relevant supplier agreements and monitor supplier compliance with workplace obligations. This includes seeking renewed declarations from suppliers that they take all reasonable steps to comply with minimum workplace standards (employment conditions, industrial instruments, anti-discrimination, workplace safety, laws and regulations) on a bi-ennial basis.

In FY2021 OneFortyOne utilised modern slavery questionnaires to review seasonal labour hire arrangements. This review included discussions with both the contractor principals and OneFortyOne contract supervisors to further assess modern slavery risks and elevate modern slavery risk awareness. In addition, these labour hire arrangements were independently audited by a third party in relation to work health and safety compliance during the reporting period. No modern slavery concerns were discovered during these reviews.

To date our modern slavery program has largely been focussed on our Australian businesses. We plan to expand our program to include our New Zealand business in the future in accordance with our roadmap.

Our policies

OneFortyOne is committed to ethical business practices throughout its businesses and this commitment is supported by our company policies including:

Code of Conduct

Our code of conduct requires compliance with the letter and spirit of fair employment practices and can apply to suppliers in certain circumstances.

Procurement Policy

Our procurement policy and principles affirm our commitment to human rights and seeks to embed the consideration of modern slavery risk factors during the supplier selection process.

Whistle-blower Policy

Our whistle-blower policy commits to the highest standards of conduct, ethical behaviour, and full compliance with the law, is applicable to suppliers, is publicly available and provides for confidential and anonymous reporting of 'concerns', which encompasses modern slavery practices. Delegated officers under the whistle-blower policy must do all that is possible and practicable to ensure the identity of any individual making a disclosure of a concern in relation to modern slavery practices is kept confidential, and ensure the concern is thoroughly investigated, with the outcome of such investigation to be reported to the whistle-blower (if appropriate). To date, there have been no reported incidents involving modern slavery type allegations.

Sustainable Forest Management

Our sustainable forest management policy requires OneFortyOne to operate in a socially responsible manner.

Commitment to FSC and PEFC Chain of Custody

Our commitment to FSC and PEFC Chain of Custody demonstrates OneFortyOne's commitment to avoiding trading or sourcing logs or wood fibre from forests which violate traditional and human rights in forestry operations or violate any of the International Labour Organisations (ILO) Conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work, 1998. More information on the certification process is set out below.

Our Certification

We are strongly committed to the regional forest industries and the communities of which we are a part. Our forest certification is an important safeguard for ensuring our business systems mitigate against the risk of modern slavery. Our Australian forest estate is certified to the internationally recognised Responsible Wood Certification Scheme (AS4708), which is endorsed by the Programme for Endorsement of Forest Certification (PEFC). This scheme requires OneFortyOne to demonstrate that all forest workers are engaged freely, are duly compensated and in compliance with legal obligations creating minimum employee entitlements.

Our New Zealand forest estate is certified to the internationally recognised Forest Stewardship Council Certification (FSC-STD-NZL-01-2012 New Zealand plantations EN). The standards required by FSC certification impose certain standards in relation to workers' rights including the requirement to promote and realise the principles outlined within International Labour Organisations Conventions (ILO Conventions).

Our sawmills in both Australia and New Zealand maintain a chain of custody system that complies with all the relevant requirements of FSC Chain of Custody Standards (FSC-STD-40-004) and PEFC ST 2002:2013.

This means that OneFortyOne avoids trading or sourcing logs or wood fibre from forests managed in a way which violates traditional and human rights and/or any of the ILO Conventions (as defined in the ILO Declaration on Fundamental Principles and Rights at Work, 1998). The Chain of Custody Standards also impose the requirement to promote and realise the workers' rights outlined within ILO Conventions.

Future plans

Our respect for human rights underpins the way we do business. We are committed to constantly striving to identify and understand potential human rights impacts in our supply chain and exercise leverage to manage these impacts where possible. The below roadmap highlights our intended key areas of focus for the next 3 years. We anticipate that our road map will evolve as we progress on the journey of enhancing our modern slavery program.

Modern Slavery Roadmap



COVID-19 Impacts

During the reporting period, OneFortyOne took action to mitigate the impact of COVID-19 on its supply chain by honouring contracts with suppliers and not cancelling any services or orders placed with suppliers as a result of COVID-19.

Assessing Effectiveness

OneFortyOne monitors the effectiveness of steps taken to address modern slavery risks in our operations and supply chains by engaging with suppliers and also soliciting feedback from relevant internal stakeholders. As our modern slavery compliance program matures, we intend to formalise the way in which we measure progress and effectiveness. We have set annual goals in our roadmap so we can look back and assess the effectiveness of our approach and inform our path forward.

Since our first statement:

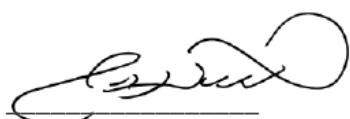
- A larger volume of OneFortyOne's suppliers have been assessed for compliance and have contractual terms in place to abide by modern slavery provisions and human rights laws.
- OneFortyOne has increased awareness within its business in relation to modern slavery risks which has informed OneFortyOne's new supplier selection for items such as corporate clothing, masks and hand sanitiser.
- No modern slavery type issues have been raised through regular third-party audits of OneFortyOne's internationally recognised certification (which contemplates key ESG issues).

Consultation

OneFortyOne has continued to engage the support of external advisers and consulted with subject matter experts within its Australian and New Zealand entities including our human resources, risk, procurement, operations and finance teams. The OneFortyOne Board was also given the opportunity to review and comment on the draft statement.

OneFortyOne will continue to consult with employees to review policies, processes and supplier arrangements going forward to ensure the measures in place support and further OneFortyOne's commitment to combatting the risks of modern slavery in our business and supply chain.

This joint statement was approved by the OneFortyOne Plantations Holdings Pty Ltd Board of Directors (in accordance with section 14(2)(d)(ii) of the Act) on 14 December 2021 and is signed by the Chairman of OneFortyOne Plantations Holdings Pty Ltd on behalf of the other reporting entities in the OneFortyOne Group.



John Gilleland

Chairman

14 December 2021

Addressing the Modern Slavery Act's mandatory reporting criteria

Modern Slavery Act Mandatory Reporting Criteria	Sections addressing criterion
Identify the reporting entity	Introduction (page 1)
Describe the reporting entity's structure, operations and supply chains	Our Business (page 1). Operations and Supply Chain (page 2 – 3)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Operations and Supply Chain (page 2 – 3)
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Managing Modern Slavery Risks (page 3 – 4)
Describe how the reporting entity assesses the effectiveness of such actions	Assessing effectiveness (page 5 – 6)
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	Consultation (page 6)
Include any other information that the reporting entity, or the entity giving the statement considers relevant.	Future plans (page 5)