

Oji Fibre Solutions

Modern Slavery Statement 2024



Contents

Introduction and Board signatory	2
About Oji Fibre Solutions	2
Commitment to modern slavery due diligence	7
Identifying modern slavery risks	8
How we assess and address modern slavery risks	9
How we track effectiveness of our actions	11
How we have consulted our business	11

Criteria One: Introduction and Board signatory

This joint Modern Slavery Statement (the Statement) has been prepared on behalf of the reporting entities Oji Oceania Management (NZ) Ltd, Oji Oceania Management (AUS) Pty Ltd and Oji Fibre Solutions (NZ) Ltd and the entities they own and control as set out in our legal structure.

References in the Statement to Oji Fibre Solutions, we, us and our, refer to the three reporting entities and the entities they own and control.

This is Oji Fibre Solutions' fifth joint Statement to meet the requirements of the Australian Modern Slavery Act 2018 (Cth) (the Act) and covers the period 1 January 2024 to 31 December 2024 (reporting period).

We support global human rights and ethical employment practices and require anyone supplying goods or services to Oji Fibre Solutions to do so too. Our purpose and values are held in common across all of Oji Fibre Solutions. We aim to achieve a sustainable path to create long-term value for our people, the partners we work with, the customers we supply and the communities and environments in which we operate.

In preparing the Statement we engaged with each of the reporting entities and consulted the entities we own or control (see Criteria Six for more detail).

Oji Fibre Solutions' Chief Executive Leadership Team, which includes representatives from each of the reporting entities, reviewed and agreed to the Statement prior to approval.

The Statement was then approved by the Boards of each of the three reporting entities covered by the Statement on 26 May 2025.

The Statement is signed by Dr Jon Ryder as Chief Executive Officer (CEO) and Chair of each of Oji Oceania Management (NZ) Ltd, Oji Oceania Management (AUS) Pty Ltd and Oji Fibre Solutions (NZ) Ltd Boards.

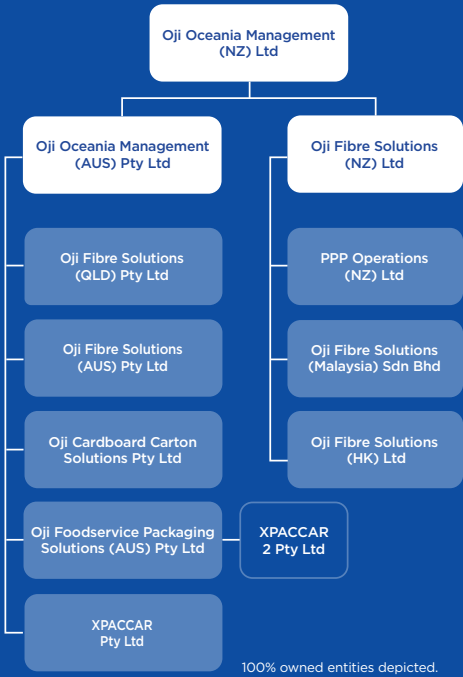


Dr Jon Ryder
Chief Executive Officer (CEO), Chair and Director of:
Oji Oceania Management (NZ) Ltd
Oji Oceania Management (AUS) Pty Ltd
Oji Fibre Solutions (NZ) Ltd

Criteria Two: About Oji Fibre Solutions

Oji Fibre Solutions is one of Australasia's leading manufacturers of wood-fibre-based products. Alongside our pulp, paper¹ and packaging products, we provide integrated logistics services and operate a recycling service that recovers used cardboard and paper throughout New Zealand, actively contributing to the circular bioeconomy.

Our Legal Structure



The entities that make up Oji Fibre Solutions are subject to the same governance structure via our Chief Executive Leadership Team. Each entity has related operations and are subject to the same policies and processes. They share many of the same suppliers.

Because the reporting entities share the same legal and governance structures and operate in the same sector, the Statement provides a consolidated description of the potential modern slavery risks and actions taken to assess and address risks in Oji Fibre Solutions operations and supply chains.

The organisational structure of Oji Fibre Solutions is managed in three key operating business units:

- 1 Pulp and Paper¹ (this business unit includes recycling operations)
- 2 Packaging (Australia and New Zealand)
- 3 Corporate (this business unit includes logistics operations)

1. Paper operations will cease end of June 2025.

Our Operations

In 2024, Oji Fibre Solutions operated across the supply chain, from fibre supply through to pulp, paper and packaging manufacturing, and on to logistics and recycling.



PULP

World-class market kraft pulps from New Zealand-grown radiata pine (Pinus radiata)



PAPER¹

Kraft and recycled containerboard for conversion into packaging products



PACKAGING

Smart packaging solutions made from sustainably-sourced fibre



LOGISTICS

End-to-end cargo management including road, rail and shipping



RECYCLING

Waste recovery and recycling services in New Zealand

Our operations include:

● HEAD OFFICE:

- > A head office in New Zealand.

● SALES SUPPORT OFFICES:

- > Located in Australia, New Zealand, Hong Kong, China (Jinan) and Malaysia (Kuala Lumpur).

● MILLS:

- > Three pulp and/or paper mills² in New Zealand producing market pulps and containerboard.

● PACKAGING FACILITIES:

- > Nine packaging facilities across New Zealand and Australia, manufacturing paper-based packaging solutions made predominately from containerboard produced at our mills.

● PACKAGING DISTRIBUTION CENTRES:

- > 15 packaging distribution centres, including Foodservice Packaging, a distributor of food packaging items ranging from paper cups to pizza boxes and cardboard pallets. These centres across New Zealand and Australia that extend our reach closer to the customers we serve.

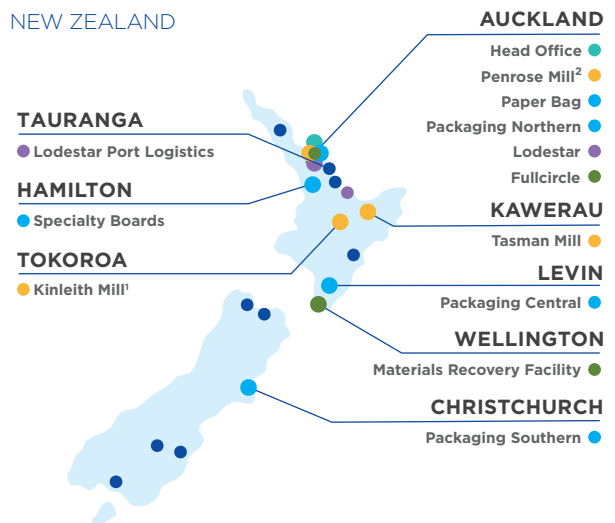
● LOGISTICS:

- > Lodestar, our integrated logistics provider provides end-to-end cargo management solutions for safe and efficient delivery of products to local and global markets.

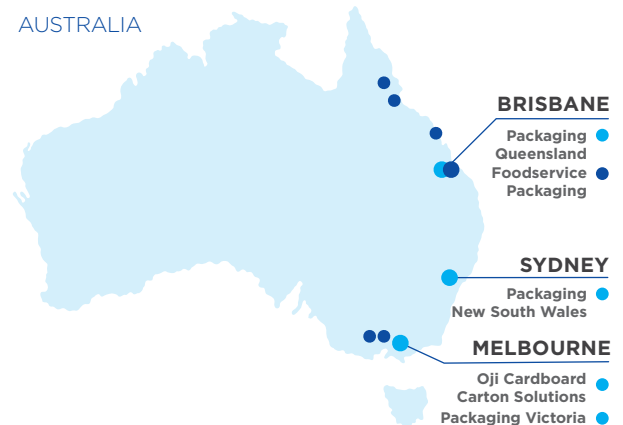
● RECYCLING:

- > Fullcircle, our waste recovery and recycling service, recovers cardboard and paper from 13 baling sites across New Zealand and collects and sorts the Greater Wellington Council's kerbside recyclables at our material recovery facility in Wellington, New Zealand.

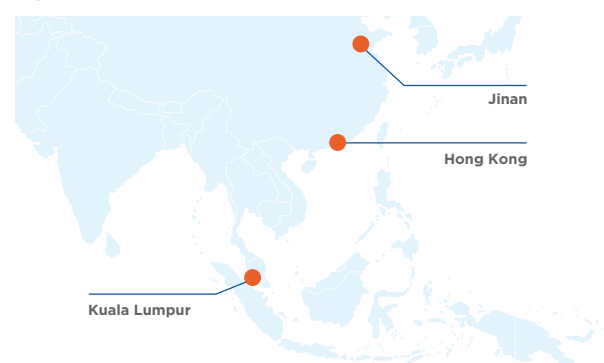
NEW ZEALAND



AUSTRALIA



ASIA



1. Paper operations will cease end of June 2025.

2. Penrose Mill ceased production 18 December 2024.



Our Supply Chain

In 2024, we manufactured approximately 1 million tonnes of pulp, paper and packaging products, distributing approximately 700,000 tonnes to more than 40 countries and 137 ports around the world.

Our People

As of 31 December 2024, Oji Fibre Solutions directly employed 1,748 people, with 81% based in New Zealand. A further 19% were located in Australia, and six employees (0.3%) based in our international sales support offices in Asia.

Our people come from diverse backgrounds and a broad range of skillsets. They are knowledgeable and experienced in the sector. 36% have chosen to stay in the business for 10 or more years.

When necessary to fill short-term vacancies, we work with labour hire firms. We recognise that we do not have the same level of oversight of those employed indirectly and, therefore, that they can pose a higher risk of exploitative practices. As with our direct employees, we have checks and balances in place to ensure these staff have the right to work, receive fair payment for the work they do for us, are appropriately protected by employment law, and are aware of and can freely access our whistle blowing mechanism, Speak Out.

Employee Location

81% (1,417) NEW ZEALAND

19% (325) AUSTRALIA

0.3% (6) ASIA

Our Governance

We believe that to build an effective modern slavery response, we need to implement strong governance processes. Oji Fibre Solutions is committed to integrating our modern slavery strategy, policies and procedures into our broader governance structure.

At Oji Fibre Solutions, we endeavour to create a culture that encourages diversity and inclusion allowing everyone

to contribute in a positive way. Our comprehensive policies are designed to ensure fairness and equal opportunities for all. They apply to the way we treat everyone, including colleagues, contractors, customers, and suppliers.

Policies and processes embed our commitment to human rights and support the protection of human rights in our operations and supply chain, including:

POLICY	PURPOSE
Code of Conduct	Reflecting our values by setting out the high ethical standards expected of all employees.
Supplier Code of Conduct	Setting expectations of suppliers including prohibition of any form of modern slavery, forced, bonded or child labour in any of suppliers' operations and supply chain.
Procurement Policy	Committing to purchasing goods and services in a manner that is ethical.
Wood Sourcing Policy	Committing to purchasing wood-fibre from legal and well-managed forest operations.
Speak Out Policy	Promoting a culture of openness and transparency by providing access to an independent process to raise any concerns they might have about the company and its actions.
Human Rights Policy	To ensure that the fundamental human rights of all employees and people doing business with Oji Fibre Solutions are protected and upheld.
Respect in the Workplace Policy (Prevention of Bullying and Harassment)	Committing to a workplace free from unlawful discrimination, harassment, sexual harassment, bullying, vilification, victimisation and adverse action.
Recruitment and Selection Policy	Ensuring a transparent, fair and equitable process based on merit and confirming valid rights to work.

Oji Fibre Solutions has an Ethics Committee with representatives responsible for acting on behalf of all reporting entities, which ordinarily comprises of:

- > General Counsel
- > General Manager – People, Safety & Culture
- > General Manager – GMCO
- > Chief Information Officer
- > Group Health & Safety Manager
- > Group Manager - Sustainability
- > Deputy Chief Financial Officer

Under the Human Rights Policy, the Ethics Committee is tasked with a key governance role, including to:

- > Monitor and review implementation and compliance of the Human Rights Policy
- > Assess the actions taken to safeguard human rights in the organisation and its supply chain
- > Investigate and recommend appropriate remedial action to the Chief Executive Officer and Board should a breach of human rights be identified within the organisation or its supply chain.

Our Supply Chain

We have long held the expectation that all our suppliers be ethical, and environmentally and socially responsible. We expect them to uphold our values and standards of operation and to share our drive for sustainable outcomes and continuous improvements.

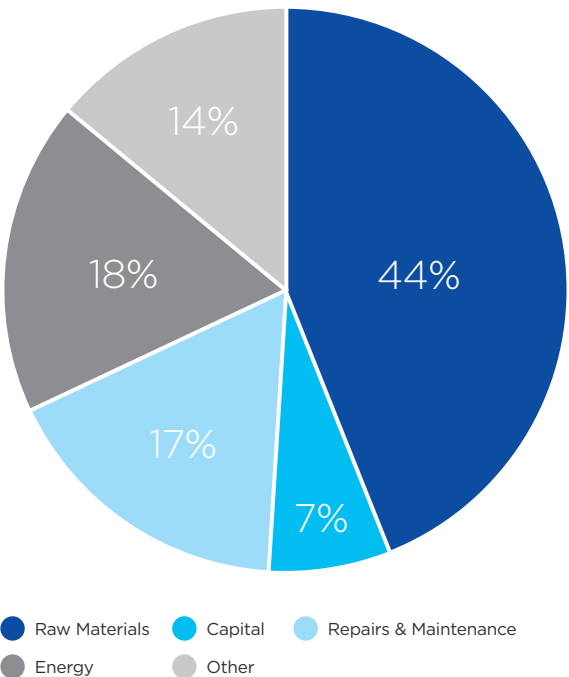
Oji Fibre Solutions categorises goods and services procurement into five broad groupings:

- 1 raw materials;
- 2 capital;
- 3 repairs and maintenance;
- 4 energy; and
- 5 other.

The graph below indicates the percentage of spend in each category.

The 'other' category includes: chemicals and starch; adhesives and inks; transport, storage and pallets; cleaning services; PPE; equipment; outsourced manufacturers; plastic packaging; and paper and packaging goods in Australia.

2024 SUPPLIER CATEGORIES



Commitment to modern slavery due diligence

Oji Fibre Solutions is proud to create shared value from natural resources and be a key contributor to the circular bioeconomy, facilitating the move from fossil-based materials towards renewable and recyclable alternatives, and more sustainable consumption.

Our Sustainability Action Plan recognises the importance of our people, our operations in New Zealand and Australia, and the value they create to fulfil our vision to be Australasia's leading manufacturer of wood-fibre products to power the circular economy.

Our reputation relies on the fair treatment and development of our people, maintaining relationships with ethical, and environmentally and socially responsible suppliers and our commitment to working with trusted and ethical clients and stakeholders.

We are committed to respecting human rights, including taking action on modern slavery.

We have adopted the following framework to manage the risk of modern slavery and to promote transparency across our business operations and supply chains.



Continuous improvement is important to Oji Fibre Solutions. To ensure we are meeting our due diligence aspirations, in 2023 Oji Fibre Solutions engaged an independent consultancy to undertake a modern slavery maturity diagnostic and inherent risk identification review.

As a result of these assessments, we have established a three year+ actions roadmap to assess, address and mitigate

modern slavery. We remain focussed on priority actions, including supplier governance and auditing programmes to strengthen our approach.

We discuss these assessments and our actions roadmap in more detail in the 'identifying risk' and 'how we address risk' sections.

Criteria Three: Identifying modern slavery risks

The depth of Oji Fibre Solutions operations means we are conscious of the potential exposure to modern slavery practices in our operations and supply chain.

Our modern slavery risk profile is not static. We assess our operations and supply chains for inherent risks and target our resources towards the businesses activities and relationships where there is the greatest likelihood of harm to people.

In 2023, the independent consultancy engaged by Oji Fibre Solutions undertook an inherent risk identification assessment across our operations and supply chains. This assessment aimed to evaluate the potential for the company to cause, contribute to, or be directly linked to modern slavery practises. The assessment was aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and considered four key cross-cutting risk factors to identify high risk namely: vulnerable populations; product and service categories; high risk business models; and high-risk geographies.

The scope of the assessment was to identify potential high-risk areas across our business with further sub-category supplier assessments necessary as part of ongoing risk management. The findings have been workshopped with the consultancy and internally.

The following inherent risks were identified as part of the assessment:

- > **External labour hire:** we utilise contractors and labour hire across our New Zealand and Australian operations. Key risk factors include semi or low-skilled labour and reliance on temporary workers (which may include migrant and other vulnerable workers), use of third-party recruiters and the potential risk of subcontracting.
- > **Facilities management services:** we procure facilities management services across New Zealand and Australia including cleaning services, on-site catering, building management and security services. The key risk factors include reliance on semi or low-skilled labour and reliance on temporary workers (which may include migrant or other vulnerable workers), use of third-party recruiters and the potential risk of subcontracting. We note increased risk in regional or rural areas and jobs performed 'out of sight' such as outside normal business hours.
- > **Machinery and equipment:** we utilise large machinery within our mills, in packaging facilities, in transport and logistics and in our recycling baling sites. The key risk with machinery is the lengthy supply chain and manufacturing risks of machinery and mechanical parts, often with connection to high-risk geographies with poor labour rights protections.
- > **Transport and logistics - Domestic:** Transport is utilised by all Oji Fibre Solutions operations including the transport of virgin wood, paper reels and pulp bales and material for recycling to and from our facilities. Our logistics business, Lodestar, arranges end-to-end cargo management across road, rail, coastal shipping, international shipping and intermodal services across New Zealand and Australia. Transport is a high risk category for modern slavery given the usual business practices of outsourcing services and sub-contracting, often low skilled roles and the high number of vulnerable workers including migrant workers. Low visibility of working conditions (e.g. working hour expectations of long-haul truck drivers) increase the risk of exploitation.
- > **Shipping - International:** This sub-category includes the shipping and logistics suppliers engaged as part of the supply chain for Lodestar's international operations including break-bulk and container shipping. Modern slavery risks in shipping are also an inherent risk as part of supply chains in goods we procure. Shipping is a high risk of modern slavery due to an intersection of risk areas. Seafarers may be from nations with human rights, labour rights and corruption challenges. There are high rates of sub-contracting (including at port and for intermodal services) with practical limitations on effective enforcement of basic conditions on board vessels.
- > **Third party procurement:** This sub-category relates to goods purchased through our Foodservices Packaging distribution centre in Australia. Foodservice Packaging does not use Oji Fibre Solutions' paper but rather procures pre-manufactured goods for resale. The majority of Foodservice Packaging's procurement is from manufacturers in high risk geographies, China and Taiwan. Other identified high risks goods we procure include uniforms and personal protective equipment, information and technology communication hardware and branded promotional goods.
- > **Recycling:** Waste management can be a high risk area for modern slavery as it often utilises low skilled workers including vulnerable populations such as migrant workers. Sub-contracting and the use of labour hire agencies are common. Our recycling service, Fullcircle, operates 13 baling sites across New Zealand, owning one and leasing the others. The baling sites are managed by external contractors decreasing visibility across the operations and supply chain.
- > **Wood Fibre:** while New Zealand is not a high risk country for illegal forestry practices, modern slavery risks can occur in the forestry sector in New Zealand given the demand for low-skilled and temporary workers (for example for planting and spraying), the use of labour agencies and sub-contractors, the use of workers from vulnerable populations, remote working conditions and value chain risks such as transport and logistics.

Criteria Four: How we assess and address modern slavery risks

Oji Fibre Solutions modern slavery response is informed by the UNGPs. We understand that human rights due diligence is an ongoing process – one which is most effective when it is embedded across our business.

Our current systems and controls already address many of the risk areas identified during the assessment by the independent consultancy in 2023. In 2024, a prioritisation plan for continued assessment and mitigation of risk areas, along with a road map to build our modern slavery maturity overtime was agreed. That plan sets out the actions recommended by the independent consultancy along with when the work will be implemented (2024-2026) and who will be responsible for each action.

In 2024, we progressed our approach to modern slavery, as outlined in our 2023 Modern Slavery Statement, with a focus on further refinement and enhancement in the following areas:

- > **Internal Audit Template:** Trialled an Internal audit template that includes a Labour Hire Compliance Checklist to review the validity of work permits, visas, other legal documents for employees, and the legal compliance and fairness of wages for workers provided by labour hire firms.
- > **Remuneration and Payroll Audits:** Conducted preliminary internal audits of remuneration, payroll, overtime, and leave systems to ensure compliance with relevant laws and fair compensation.
- > **Supplier Governance Framework:** Developed a supplier governance framework that incorporates regular performance assessments, audits, and compliance checks with a particular focus on modern slavery and human rights. As part of this framework, in 2024 we developed a supplier information pack for our pulp and paper operations, formalising how we will manage our suppliers.
- > **Modern Slavery Training Monitoring:** Continued efforts to monitor modern slavery awareness training, enhancing the process with regular reporting on training completion rates.
- > **Policy Reviews:** Started the review of our Human Rights Policy and Supplier Code of Conduct to ensure alignment with international standards, including the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the Ethical Trading Initiative (ETI) Base Code.

Responsible sourcing

Our Supplier Code of Conduct, Procurement Policy and Wood Sourcing Policy govern our responsible sourcing commitments.

44% of our 2024 spend was on raw materials. Oji Fibre Solutions wood-fibre is sourced from the North Island of New Zealand. Our wood-fibre supply is sourced from legal and well-managed forest operations in accordance with our Wood Sourcing Policy. The Wood Sourcing Policy adheres to Forest Stewardship Council® (FSC®) and Programme for Endorsement of Forest Certification (PEFC) certification.

Our wood-fibre inputs are sourced from sustainably managed forests in New Zealand with 84% in 2024 certified to FSC® and PEFC standards. The remaining 16% meets the requirements for 'controlled wood' under FSC® or 'controlled sources' under PEFC criteria.

Our Supplier Code of Conduct was reviewed and updated in 2022. The expectations of the Code are communicated through the Oji Fibre Solutions website, contract terms and purchase orders. Under the Code, suppliers to Oji Fibre Solutions, no matter their position within our supply chain, are expected to:

- > Comply with all applicable laws in the countries in which they operate
- > Undertake ethical business practices
- > Avoid the procurement of wood from unacceptable sources
- > Protect human rights and labour standards
- > Prioritise workplace health and safety and provide secure, safe and healthy work sites
- > Manage their business in an environmentally responsible manner
- > Commit to open communication and positive relationships with the local communities in which they operate.

Our process of onboarding a new supplier includes a prequalification assessment of their governance and operations. We also set parameters for ongoing supplier performance throughout the term of the agreement. At the point when we assess the renewal of contracts with existing major suppliers, a requalification assessment of them is carried out. The Oji Fibre Solutions Supplier Code of Conduct is part of our standard terms of purchase, and we aim to include this in agreements where our terms are negotiated. In 2024, we required 11 suppliers to complete a modern slavery supplier questionnaire prior to entering into a contract with them, nine suppliers in Australia and two suppliers in Malaysia.

Along with the minor updates made in 2023, we are continuing to refine the questionnaire to ensure it further aligns with all applicable Oji Fibre Solutions policies. We plan to integrate the updated questionnaire across all Oji Fibre Solutions entities and business services so there is consistency in supplier engagement across the business.

Our raw material suppliers together with a number of our other tier one suppliers are predominately based in New Zealand and Australia. However, we have do have suppliers (both tier one and beyond) in a range of other countries. Accordingly, we review the risks presented by these countries and take appropriate action.

Responsible Business Practice

As a member of SEDEX (Supplier Ethical Data Exchange), we complete Self-Assessment Questionnaires (SAQs) and undergo SMETA (Sedex Members Ethical Trade Audit) 4-Pillar audits to support our customer requirements. SMETA is a widely recognised social compliance audit methodology that assesses labour standards, health and safety, environmental management, and business ethics—referred to as the 4-Pillars.

In 2024, SMETA 4-Pillar audits were conducted by a third party at five of our Packaging facilities; three in Australia and two in New Zealand. The audits included private employee interviews and evaluated compliance with employment and labour laws, including compensation and benefits, working hours, grievance mechanisms, human rights, recruitment, and business integrity. In addition, the audits assessed supplier management practices, ensuring that due diligence procedures were in place to evaluate and mitigate risks related to modern slavery, child labour, and other unethical practices within the supply chain.

The audits did not raise any ongoing human rights risks or concerns. All other concerns identified were quickly resolved. The audits specifically recognised our comprehensive human rights policies, review of our stakeholders and suppliers and the open dialogue Oji Fibre Solutions maintains with unions.

Capability building

In 2024, we achieved 100% completion of the required modern slavery awareness training module for all employees assigned to it. This aligns with the target set in our 2025 Sustainability Action Plan, which aims for 100% annual completion for employees in targeted roles: commercial, human resources, supply chain management, procurement, and group governance.

Building on this success, we enhanced our existing online training with content from Law of the Jungle, experts in eLearning education. The updated training provides a more interactive experience, covering the potential impact of modern slavery on our operations, relevant legal frameworks, risk identification, and reporting procedures. With real-world examples, tailored scenarios, and red flags to help employees recognise risks, the content uses familiar language aligned with our Better Business training suite, ensuring consistency and ease of understanding across all modules. The training also includes randomised quizzes to test knowledge, with a refresher quiz every two years. Rollout of the updated module is scheduled for 2025.

Grievance mechanisms

Should it become evident that we are causing, exacerbating, or directly involved in human rights issues, we will engage in dialogue with those concerned and strive to remedy the situation through appropriate procedures.

If the laws and regulations of a country differ from international human rights norms, we will adhere to the higher standard.

Speak Out

Should any of our people, contractors or suppliers be concerned about their rights, how they are treated or any other aspects of our operations, they can freely access our whistle blower mechanism - Speak Out. All concerns are treated confidentially and are investigated by the Oji Fibre Solutions' Ethics Committee.

The Speak Out Policy includes safeguards for protecting complainants from reprisal, including confidentiality and protecting them from personal disadvantage or victimisation for having raised a concern.

The reports received from Speak Out enable us to review the information for any trends and take any necessary action. We have not identified any reports related to modern slavery for the reporting year from this reporting mechanism. Employee awareness of Speak Out is important to us. Speak Out is communicated through posters, the intranet, inductions and company-wide communications and updates.

Oji Holdings Corporation Human Rights Reporting Desk

Oji Holdings Corporation has become a member of the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) and has established a human rights reporting desk through the "Engagement and Remedy Platform." This desk is available to all stakeholders, including suppliers working with Oji Group companies, and allows them to submit consultations on issues related to business and human rights. These include concerns such as the prohibition of forced labour and child labour, the elimination of discrimination, freedom of association, and the provision of a safe and healthy working environment, all through a web-based reporting form.

CONTACT US:



<https://jacer-bhr.org/application/form.html>

*Reports are accepted in Japanese and English.

*We do not accept reports or consultations by phone.

Criteria Five: How we track effectiveness of our actions

We want to ensure the actions we are taking to manage our modern slavery risks actually work. We take a range of steps to assess the effectiveness of our policies, procedures and modern slavery response. As we continue to increase our modern slavery engagement across our business, we are continuing to learn about how to enhance our effectiveness.

The Oji Fibre Solutions sustainability, human resources, procurement and internal audit functions play key roles in doing this.

Assessments include:

- > Confirming direct employees possess and maintain their legal entitlement to work.
- > Checks and balances over our internal remuneration, payroll overtime and leave systems.
- > Confirming with labour hire firms that any workers provided are legally entitled to work and they are appropriately remunerated for the work they do for the business.
- > Reviewing the licenses of the labour hire providers we use for this service in Australia to ensure a current licence is held.
- > Holding long-standing relationships with our main labour hire firms and maintaining regular engagement with them.
- > Appropriate separation of duties in our governance systems and operational processes.
- > Governance of supplier relationships and performance.
- > Monitoring successful completion by employees of internal training on our policies and modern slavery awareness raising.

Our owner, Oji Holdings Corporation, also reviews our management controls. This includes assessing that our labour and supply chain policies are clear, maintained and followed. More information on Oji Holdings Corporation can be viewed at

ojiholdings.co.jp/english/

Criteria Six: How we have consulted our business

The development of this statement was led by our sustainability and legal divisions, which consulted directly with key functions across Oji Fibre Solutions to draft the Statement.

We engaged with each of the reporting entities and consulted the entities we own or control throughout the drafting process. Oji Fibre Solutions' Chief Executive Leadership Team, which includes representatives from each entity, reviewed and agreed to the Statement prior to approval.

