

Modern Slavery Statement

WA Plantation Resources Pty Ltd

FY2020

This statement covers the activities of WA Plantation Resources Pty Ltd (ACN 098 094 792) (**WAPRES**) and its owned and controlled entities during the year ended 31 December 2020.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of WAPRES on TBA

About us

At WAPRES, we are committed to conducting business responsibly and ethically and to ensuring that all aspects of our business practices, including our supply chains, are free from any form of slavery. We reject any forms of modern slavery which can take the form of unpaid or underpaid servitude, human trafficking and forced labour. We are committed to implementing effective systems and controls to ensure that it does not take place within our own business or through any of our supply chains.

Our structure

WAPRES is a company incorporated in Australia and our registered office is located at Level 2, 53 Victoria Street Bunbury WA 6230.

WAPRES is a subsidiary of Marubeni Corporation, headquartered in Japan. Marubeni Corporation and its subsidiaries conduct a diversified range of business activities across all regions of the world.

WAPRES itself has a number of owned and controlled entities, including WA Chip & Pulp Co Pty Ltd, WAPRES Treefarms Pty Ltd, Southwest Forest Holdings Pty Ltd.

Our operations

WAPRES is a plantation manager and wood fibre producer, supplying fibre to the pulp mill manufacturers in the Asia/Pacific region (for high quality paper manufacture), and residue wood fibre as biomass to renewal and sustainable power generators in Japan and Europe. We have three main operational hubs in the south west of Western Australia (WA): in Bunbury (head office and Chip Mill and Port), Manjimup (Chip Mill and Nursery) and the south west of WA (forest and plantations).

We engage approximately 85 employees and up to 10 contractors

Our supply chain

Our suppliers are entirely located in Australia, accounting for 100% of our spend.

The main types of goods and services that we procure are wood fibre, plantation establishment, harvest, haulage and stockpile management.

We engage our suppliers on long term contracts reviewed from time to time.

We also have a number of indirect suppliers, including software/hardware, office supplies, personal protective equipment, spare parts and tools.

Modern slavery risks

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

Risk assessment methodology

We developed a risk assessment methodology which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk.

Our initial risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks. Our risk profile is summarised in the table below.

Risk profile

Risk	Description of risk
Sector /Industry	We have identified a number of sectors and industries within our operations and supply chains that may have a higher prevalence of modern slavery risks because of their characteristics, products and processes. These include electronics, cleaning, maintenance, shipping and freight.
Product / Service	We have identified products and services within our operations and supply chains that may have a higher prevalence of modern slavery risks because of the way they are produced, provided or used. These include electronic goods, software/hardware, office supplies, personal protective equipment, spare parts and tools.
Geographic	We have not identified any geographic risks as our suppliers are all located in Australia which has a strong regulatory framework including industry codes of practice and external certification requirements.
Specific Entity	We have not identified any entity specific risks associated with any particular supplier.

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. That is why during our first reporting period we introduced a number of steps to assess and address modern slavery in our operations and supply chains.

This is in addition to our existing actions to manage modern slavery risks, including:

- purchasing, where possible, locally and fair-trade certified consumables;
- conducting due diligence on third party service providers; and
- partnering with suppliers who share our stance on modern slavery.

Due diligence

As noted above, we undertook an initial risk assessment to identify any key modern slavery risks that existed within our operations and supply chains.

In FY2020 we identified no suppliers as presenting any risk of modern slavery. Therefore, we asked our top 6 to complete a detailed supplier questionnaire, which audited their ethical business practices and modern slavery risks. We are still awaiting responses from some suppliers.

We are committed to undertaking our due diligence processes when contracting with external suppliers and to identifying and assessing any indications of suppliers being of high risk. We will not work with high-risk suppliers until we have conducted the appropriate assessment so that our standards will not be compromised.

Governance and accountability framework

Executive management has overall responsibility and the process monitored by the WAPRES Compliance and Systems section.

Policies and procedures

During FY2020 we introduced a number of policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks, including the introduction of a:

- Modern Slavery Policy for our business that establishes our commitment to addressing modern slavery risks in our business and driving an accountability for ethical business practices across our organisation.
- Supplier Code of Conduct that set out the minimum expectations for our suppliers and third party labour providers related to ethical practices including addressing modern slavery risks in their business, which was rolled out November 2020. We have also established an expectation with our suppliers that they will engage with their suppliers on similar terms. We wish to work in partnership with our suppliers to address risks of modern slavery that exist in our suppliers.
- Grievance Procedure that supports and encourages employees to raise concerns without fear that their future employment prospects will be adversely affected.

These policies and procedures complement our existing governance framework.

Training

We are committed to training our employees and ensuring they have a healthy understanding and respect for how their choices can have far-reaching impacts upon basic human rights. We have made the training resources provided by Anti-Slavery Australia available to our employees

COVID-19

The COVID-19 pandemic has brought further challenges to modern slavery and highlighted social and economic inequalities worldwide. WAPRES has assessed the impact of COVID-19 pandemic on its practices and risks to modern slavery.

Care is taken to monitor the situation and where appropriate enact work from home for vulnerable employees.

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions by

- regularly reviewing our modern slavery processes, with senior management meeting annually to consider whether we are appropriately identifying and evaluating our modern slavery risks; and
- when commencing a new operation or engaging a new supplier, assessing whether our existing risk management processes remain appropriate.

We also monitor our performance against a number of key performance indicators. These include:

- the percentage of employees who have completed training on modern slavery;
- the number of actions that have been implemented to deadline; and
- the number of suppliers we have asked to complete a detailed questionnaire.

We will continue to identify and evaluate risks relating to human rights and develop our policies, procedures, and training to help combat modern slavery. Over the next year, WAPRES will continue to adapt its business as necessary due to the introduction of the *Modern Slavery Act 2018*.

Consultation

As a subsidiary of the Marubeni Corporation, WAPRES' approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across the Marubeni Group. WAPRES operates its business mostly through its WA & Chip & Pulp Co Pty Ltd company.

FY2021 focus

As this is our inaugural statement, we recognise there are further steps we can take to assess and address the risks of modern slavery in our operations and supply chains.

This statement was approved by the Board of WAPRES) and Executive Management:

WA PLANTATION RESOURCES PTY LTD
ACN 094 151 792

Resolution of directors pursuant to sec 248A
made on March 18th, 2021

We, being all the directors of the above company at the date of this resolution, are in favour of the following resolution:

Modern Slavery Statement:

EXECUTION OF DOCUMENTS:

1. It is RESOLVED that WAPRES declare Modern slavery statment FY2020.
2. It is RESOLVED that any two directors and/or the company chief executive officer are authorised to execute and deliver on behalf of the company any documents required to give effect to implementing this resolution.

Signed:

Joe Kawaguchi
Digitally signed by Joe Kawaguchi
Date: 2021.03.18
11:10:09 +0800

T. Kawaguchi

Takuya Kuwahara
電子署名名義: Takuya Kuwahara
日付: 2021.03.18
16:41:19 +09'00'

T. Kuwahara

koichi hase
電子署名名義: koichi hase
日付: 2021.03.18
12:48:08 +09'00'

K. Hase



S. Kobayashi