

MITSUI BUSSAN WOODCHIP OCEANIA PTY LTD

MODERN SLAVERY STATEMENT 2022

1. Introduction – s 16(1)(a) of the Act

This Modern Slavery Statement describes the steps taken by Mitsui Bussan Woodchip Oceania Pty Ltd (ACN 070 210 990) (**MWO**) and its controlled entities (together, **MWO Group**) during its financial year ending 31 March 2022 to address modern slavery risks in its operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**).

MWO Group is a reporting entity under the Act.

2. Our organisation – s 16(1)(b) of the Act

- **Corporate structure**

Mitsui Tokyo – MWO is wholly owned by Mitsui & Co., Ltd. (**Mitsui Tokyo**) which is a global conglomerate with multiple businesses operating across different industries under the one corporate group. With approximately 44,500 employees and 514 affiliated companies, Mitsui Tokyo operates business through 132 offices in 64 countries around the world.

MWO Group - MWO Group has approximately 23 employees in Victoria and Western Australia. Mainly involved in forestry business consisted of plantation management, milling and sales of plantation tree and woodchip.



In contributing to the sustainability of the Australian community, MWO Group actively promotes social contributions in collaboration with other Mitsui group companies.

For more information on our organisation, please refer to our websites below:

Corporate Profile:

[Group Companies | Mitsui Bussan Woodchip Oceania - Mitsui & Co. \(Australia\) Ltd.](#)

[Home - Bunbury Fibre Exports](#)

3. Assessing risk – s 16(1)(c) of the Act

Assessment

MWO Group has a unique business portfolio and organisational structure. Our supply base is diverse, including small and medium-sized businesses, as well as multinational corporations. The majority of MWO Group's supply chain is woodfibre. All woodfibre is sourced from within Australia (Bunbury region in Western Australia and Green Triangle region in Victoria and South Australia) through one of the following supply arrangements:

- Harvest and haulage operations where MWO group engages contractors and supervises the work. Contractor engaged labour.
- Third party supply of wood under contract from either state owned or private entities. Suppliers or their contractors engage labour.

Most of the woodfibre supply is certified under Forest Stewardship Council or Programme for the Endorsement of Forest Certification. We have a robust process that aims to ensure we only work with appropriate suppliers who can meet the standards that we expect.

Human Rights Risk Mapping

Mitsui Tokyo has assessed our global supply chains in 2020 by assessing 3,128 transactions conducted by the head office and 7,820 transactions conducted by its overseas office (which includes MWO Group) from the human rights perspective broadly including modern slavery risks using human rights risk mapping, together with advice from and consultation with independent experts.

The assessment was based on leading international human rights risk indicators and other tools such as the "[List of Goods Produced by Child Labor or Forced Labor](#)" of Bureau of International Labor Affairs (ILAB) and "[Global Map of Environmental and Social Risks in Agro-Commodity Production](#)" of International Finance Corporation (IFC), placing emphasis on the core labour standards identified by the International Labour Organization (ILO).

Through the risk mapping assessment, Mitsui Tokyo assess inherent country risks and industry risks and identified 84 high risk combinations - ie a list of source country-procured goods combinations - such as garments manufactured in Bangladesh, rice produced in Myanmar, and coffee produced in Colombia, sesame in Myanmar and coconuts in Philippines.

Through this process, none of the existing suppliers of MWO Group have been identified in the high-risk combinations.

MWO Group also engages suppliers of professional services (such as legal, accounting and engineering firms). MWO Group is satisfied that these service providers have responsible supply chain policies and anti-modern slavery statements, and in relation to the services provided to MWO Group, are unlikely to have high-risk combinations in those supply chains.

4. Managing risk - s 16(1)(d) of the Act

Policies and monitoring framework

First of all, MWO Group maintains its Business Conduct Guidelines, which oblige the company and its people to conduct our business in a manner that respects human rights and does not involve any modern slavery practices. The Guidelines also prohibit discrimination on the basis of any protected attribute under the law. The Guidelines are MWO Group's principal code of conduct for our employees and contractors, who are required to understand and adhere to the Guidelines throughout their employment or engagement.

We also have a Whistleblower Policy in place with the reporting route available for both internal and external reports in case of any complaint or concern regarding our modern slavery obligations.

Further on above, our products, certified to Forest Stewardship Council and Programme for the Endorsement of Forest Certification, are assured to be free from any direct or indirect involvement in activities that violate traditional and human rights in forestry operations.

Actions taken

For the reporting period ending 31 March 2022:

- Sustainable Procurement Policy - we have implemented this policy in April 2020. The policy sets out our expectations for our suppliers (and sub-suppliers) to prevent and eliminate modern slavery, as well as our intentions to audit, monitor, and terminate business in case of continued non-compliance.
- Business Conduct Guidelines (e-learning) – our e-learning Mitsui Business Conduct Guidelines course include a module dedicated to modern slavery where we can learn modern slavery risks in the context of our trading and investment business model. Most of MWO Group's employee attended this e-learning course.
- Training – Mitsui Tokyo facilitated a webinar on sustainable supply chain management to which all MWO Group staff were invited.

5. Assessing effectiveness and looking ahead - s 16(1)(e) of the Act

We are assessing the effectiveness of our actions by:

- monitoring the response rate of our survey questionnaire and undertaking periodic reviews of the questionnaire to improve its usefulness; and
- working together with Mitsui Tokyo to benefit from their reflections on their own human rights due diligence efforts.

5. Assessing effectiveness and looking ahead - s 16(1)(e) of the Act (Continued)

In the financial year ending March 2023, we intend to:

- roll out our survey questionnaire for all new suppliers meeting certain criteria;
- analyse the survey responses and engage our internal key personnel to discuss what appropriate actions can be taken; and
- promote awareness of modern slavery risks amongst business divisions, through training and greater participation in the administration of survey questionnaires.

We recognise that the risks of modern slavery are complex and evolving. We will continue to work to address these risks in our business and engage with a range of stakeholders to assess the effectiveness of our actions and enhance our approach.

6. Consultation in preparing this statement s 16(1)(f) of the Act

MWO Group controls the following entities:

- Bunbury Fibre Exports Pty Ltd ACN 100 967 762 which principal activities consisted of the milling and sale of woodchip during the reporting period for this statement.
- Bunbury Fibre Plantations Pty Ltd ACN 128160 145 which was not actively engaged in business during the reporting period for this statement.

MWO Group entities consulted with one another to develop this Modern Slavery Statement. This involved appropriate officers and managers from across the entities working collaboratively and sharing the steps taken by, and experiences of, their respective entities during the reporting period to assess and address modern slavery risks that arose within their operations and their supply chains.

I, Masaru Namiki, hereby certify that this Modern Slavery Statement 2022 has been approved by the Board of Directors of Mitsui Bussan Woodchip Oceania Pty Ltd on 12 December 2022.



Masaru Namiki
Managing Director
Date: 12 December 2022