



The UBEECO™ Group Pty Ltd

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MODERN SLAVERY STATEMENT

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1. This Statement

This Modern Slavery Statement is submitted on behalf of UFP Australia Pty Ltd (ACN 164 773 013) and its Australian related/controlled entities (as detailed on page 2 of this Statement) (hereinafter referred to collectively as the **UBEECO Group**) for the year ended 31 December 2023.

Modern slavery is the deprivation of a person's liberty and can take various forms including servitude, forced and compulsory labour and human trafficking.

The UBEECO Group holds integrity, transparency, and empowerment in high regard among its values, and recognises it has obligations to act in a socially responsible and ethical manner in its business practices. The UBEECO Group is committed to ensuring compliance with Australian laws and regulations including the *Modern Slavery Act 2018* (Cth) (**Act**).

The UBEECO Group is committed to taking steps to:

- identify and manage the risk of slavery, or slavery like activities, within its operation, including its supply chains;
- act ethically and with integrity and with awareness for the potential for modern slavery in our business;
- demonstrate our commitment to tackling modern slavery and making clear our requirements in this respect within our supply chains;
- update our procedures and processes on a regular basis to ensure our people have the tools and confidence to address any suspected incidences of modern slavery, including considering any appropriate remedial action,

as may be required under the Act.

2. Scope

This statement applies to all employees and contractors of the UBEECO Group and all its related entities, and suppliers and vendors to the UBEECO Group who have, or seek to have, a business relationship with the UBEECO Group.

3. Our structure, operations and supply chains

Structure

The UBEECO Group consists of an Australian holding company, namely, UFP Australia Pty Ltd (ACN 164 773 013) (which is ultimately owned by UFP Industries, Inc (United States)).

UFP Australia Pty Ltd has two (2) subsidiaries:

- The UBEECO Group Pty Ltd (only trading entity) (**UBEECO**); and
- UFP Australia Real Estate Pty Ltd (non trading).

In total, the UBEECO Group (specifically, UBEECO) employs 198 people in Australia.

A list of the trading/brand names associated with the UBEECO Group/ UBEECO (including controlled entities) include the following:

- Boxpack;
- Boxpack Packaging;
- Construction Multi Guard;
- J.C. Gilmore;
- Expert Packaging;
- Silverwater Box;
- UBEECO Packaging Solutions; and
- Integra Packaging

Operations

The UBEECO Group operates in Australia and is comprised of two divisions, with activities as follows:

- The **manufacture** of wooden pallets, crates; and
- The **supply** of consumable and protective packaging.

There are five (5) factories (which are leased by UBEECO):

- Gilmores, Port Melbourne, VIC (11 employees)
- Gilmores, Mordialloc, VIC (6 employees)
- UBEECO, Orica Site, Deer Park, VIC (31 employees)
- UBEECO, Erskine Park, NSW (120 employees)
- UBEECO, Carole Park, QLD (31 employees)

Supply Chain

UBEECO Group's suppliers are located in:

- New Zealand;
- China;
- Vietnam;
- Papa New Guinea;
- India;

- United Arab Emirates;
- Italy;
- Taiwan;
- Latvia;
- Brazil;
- United States of America;
- Malaysia;
- Thailand; and
- Indonesia.

The main types of goods and services that UBEECO Group procures and the source countries of these goods and services are as follows:

Good / Service	Countries
Timber	Brazil, New Zealand,
Engineered wood / timber	Vietnam China, Papa New Guinea, Brazil, United States of America
Pallet collars	Latvia
Fibre Board/ Cardboard	China, India, Taiwan
Packaging Consumables (Strapping, tape, ect)	Italy, UAE, India, Indonesia, Vietnam, Thailand
Pallet /Shrink / stretch/ plastic wrap	Malaysia, Vietnam

Approximately 90% of the suppliers are long term stable relationships that we continue to do repeat business and the remaining 10% are ad hoc suppliers where needed for sourcing new products or sourcing competitive pricing.

There are no known instances of modern slavery practice (as defined above) amongst the suppliers of the UBEECO Group. The UBEECO Group generally seeks to avoid engaging suppliers who are not reputable or well known in the industry and do not have ties to other Australian companies and world-wide.

The UBEECO Group has a variety of internal processes it adopts to ascertain its suppliers' commitment to not engage in modern slavery practices themselves and/or in their supply chain.

UBEECO Group seeks to ensure that all suppliers used maintain their own modern slavery or equivalent policies.

There are no fixed supplier contracts in place.

4. Risks of modern slavery practices

The UBEECO Group recognises that:

- modern slavery includes activities such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

- modern slavery encompasses situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Generally, modern slavery does not extend to substandard working conditions or underpayment of workers, however these may be present in examples of modern slavery.
- we engage with suppliers considered to be high risk countries for “modern slavery prevalence” by the Global Slavery Index (GSI), including the United Arab Emirates, Papua New Guinea, Indonesia and Malaysia. We also use suppliers from lower risk including New Zealand and Italy. Accordingly, we seek to assess our operations in these locations, commensurate with the associated risk profiles and our knowledge of/dealings with those suppliers, and conduct a desk top assessment in the reporting periods. To date, no reports of modern slavery have been raised with the board or management.
- the risks of modern slavery practices in the manufacturing sector are considered the third highest percentage of forced labour. The utilisation of labour hire of low skills labour, particularly in higher risk countries, increases the risk of modern slavery in the manufacturing sector.
- the supply division includes using bulk freight and international shipping and importing (that is, from organisations not subject to the Act).
- container freight and international shipping lines may hold some risk of modern slavery practices.

The UBEECO Group has been able to mitigate these risks, in particular:

- the review and development of policies and processes to address modern slavery risks;
- setting up mechanisms to allow safe reporting of risks (including the provision of a questionnaire to suppliers);
- obtaining detail of various suppliers’ policies in respect of not engaging in modern slavery practices (including in their own supply chains);
- providing training to staff about modern slavery.

5. Actions taken to address risks

The UBEECO Group is committed to ensuring that it has appropriate measures in place to limit the risks of any modern slavery practices occurring within its operations and seeking to ensure it does not engage with suppliers who have any such practices within their operations. The UBEECO Group is further committed to taking proactive steps required to identify and respond to any instances of modern slavery in its supply chains, including, in particular, educating its managers responsible for its supply chains and notifying its suppliers of its expectations that they will not engage in modern slavery practices in their operations and likewise have appropriate processes to identify and deal with risks that may arise.

The following policies are available and apply to UBEECO Group/UBEECO employees:

- Modern-Slavery Policy;
- Anti-Discrimination and EEO Policy;
- Code Of Conduct; and

- **Grievance Policy**

The UBEECO Group is in the process of developing a Modern Slavery Policy prohibiting modern slavery practices which applies to all employees, contractors and suppliers of the UBEECO Group, and identifies actions which the UBEECO Group may take to deal with and monitor these risks, as well as remedial action in the event of modern slavery practices being identified. Compliance and enforcement of this policy among staff is monitored by Human Resource Department. Further, senior management are also involved in overseeing the UBEECO Group's policies and processes in relation to compliance with the Act. The Human Resource Department conduct training of staff members.

While the UBEECO Group does not maintain supplier agreements, the UBEECO Group has developed a questionnaire setting out the UBEECO Group's firm anti modern slavery position which will be provided to new suppliers and contractors. If the response to the questionnaire is inconsistent with UBEECO Group's firm position in relation to modern slavery practices, UBEECO Group will not trade with that particular supplier.

Section C of the questionnaire encourages contractors and suppliers ensure modern slavery practices are not engaged in by any of its directors, officers, employees, agents, representatives, contractors or sub-contractors, and requires that policies and procedures are in place (and provided to the UBEECO Group) to ensure compliance with the clause.

The UBEECO Group has developed an action plan to improve its response to modern slavery risks in 2023. This involves, among other things:

- appropriate personnel to consider and determine any remedial steps to be taken to deal with any breaches of the UBEECO Group's Modern-Slavery Policy;
- the Human Resource Department reviewing and identifying training courses and conduct training for staff members and other relevant personnel;
- adopting a continuous improvement approach to monitor compliance, including audits and requests for self-assessment from contractors and suppliers and the analysis of information and dated related to supplier and contractor performance.

6. Monitoring compliance and assessing effectiveness

The prevention, detection and reporting of modern slavery in any part of our business (and our supply chains) is the responsibility of all our staff. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery as soon as practicable. The UBEECO Group will treat any notification on modern slavery as being made in good faith and notifications will be treated with the necessary confidentiality.


The UBEECO Group will assess effectiveness by keeping a record of reported risks and actions taken following such identification, with a view to limiting reoccurrence of such events. This information and data will be obtained through training, monitoring, self-assessment and consultation.

7. Consultation with owned entities

This statement is made on behalf of the whole UBEECO Group, which includes all of its subsidiaries.

8. Approvals

This Modern Slavery Statement for UFP Australia Pty Ltd and its Australian related entities referred to collectively as The UBEECO Group, was approved by the board of UFP Australia as the parent entity, on the 10th January 2024.

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Eric Miller
Managing Director, UFP Australia Pty Ltd