

# MITSUI BUSSAN WOODCHIP OCEANIA PTY LTD

## MODERN SLAVERY STATEMENT 2024

### 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 2024 to address modern slavery risks in its operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (**Act**).

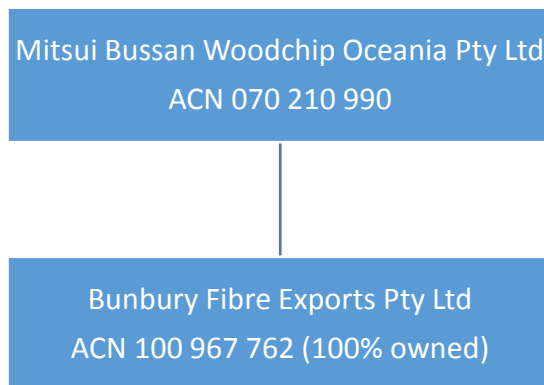
MWO Group is a reporting entity under the Act.

### 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. Together with its many subsidiaries and affiliates, Mitsui Tokyo operates business through its offices in countries across the world.

MWO Group - MWO Group has approximately 24 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.

We understand that we need to lead by example in the way we do business. We operate by a set of values which shapes the way we think, work and act to ensure we are helping people to achieve their ambitions – in the right way.

This also means we aim to act fairly, ethically and openly in everything we do. We are committed to combating the risk of modern slavery in our supply chains or in any part of our business.

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 2024:

- 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.

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

We are assessing the effectiveness of our actions by:

- holding annual compliance surveys to assess our employees' awareness of human rights and
- working together with Mitsui Tokyo to benefit from their reflections on their own due diligence efforts on human rights.

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.

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.

## **7. Certification**

I, Taro Kondo, hereby certify that this Modern Slavery Statement 2024 has been approved by the Board of Directors of Mitsui Bussan Woodchip Oceania Pty Ltd on 03 September 2024.

*Taro kondo*

**Taro Kondo**  
Managing Director  
Date: 2024年9月5日