



Modern Slavery Statement

ABP
FY2021

This joint statement covers the activities of ABP Finance Pty Limited (ACN 139 991 101) and its owned and controlled entities, including the reporting entity Australian Bluegum Plantations Pty Ltd (ACN 139 400 623), (collectively **ABP**) during the year ended 31 December 2021.

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.

About us

At ABP, we recognise that respecting the human rights of those affected by our business activities is important. We are committed to promoting a culture dedicated to continually improving economic, social and environmental return.

We are distinguished from most other forestry companies by our strategy of leveraging the benefits of managing the entire supply chain. This provides the opportunity to directly mitigate modern slavery risks, whilst building awareness and driving change within the industry.

Our structure

ABP Finance Pty Limited and Australian Bluegum Plantations Pty Limited are incorporated in Australia with their registered office located at Level 3, 80 Dorcas Street, South Melbourne 3205.

ABP is controlled by Global Forest Partners LP who is located in New Hampshire, United States of America and manages approximately US\$3.3 billion in world forestry assets.

ABP Finance Pty Limited owns and controls, Australian Bluegum Plantations Pty Ltd (ACN 139 400 623). Australian Bluegum Plantations Pty Ltd owns and controls Plantation Pulpwood Terminal Pty Ltd (ACN 103 498 960).

Our operations

We are a forestry business created in 2009 by Global Forest Partners LP to acquire, manage, and harvest *Eucalyptus globulus* (Tasmanian blue gum) plantations. The plantations are grown predominantly for the woodchip market to be exported and manufactured into high quality pulp for paper products and rayon. As of 31 December 2021, our plantations cover over 108,344 hectares of timberland in Australia.

Our core operations are in Victoria, South Australia and Western Australia. However, we also market resource that originates from Tasmania.

We engage 110 employees, 16 training providers and 83 contractors.

Our supply chain

We work with approximately 83 contractors from a number of Australian states including Victoria, South Australia and Western Australia. Our contractors are located in Australia and are the primary services procured by ABP, accounting for 65% of total supplier spend.

These contractors are used in a number of areas of ABP's business, including:

- haulage contractors for transport of woodchips or logs from the forest to the ports;
- harvesting contractors for harvest and chipping of trees;
- silviculture contractors are responsible for forest management tasks including site preparation and clean-up, planting, spraying, and fertilising; and
- suppliers of woodchip.

We engage our suppliers on a formal contractual basis of three years for haulage and harvesting service providers and an annual basis for silviculture.

We also have a number of other suppliers and service providers, including office supplies, software and hardware, personal protective equipment, tools, fuel cards, credit cards, insurance services.

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	<p>As noted above, there are four main sectors that we work in. These sectors are:</p> <ul style="list-style-type: none">• haulage contractors transport the woodchips or logs from the forest to the ports;• harvesting contractors who harvest and chip the trees.• forestry management (also known as silviculture) contractors who undertake various tasks including site preparation and clean-up, planting, spraying, and fertilising; and• purchasing and on-selling woodchip. <p>Our harvest, haulage and woodchip suppliers all present a low modern slavery risk as they comprise well established businesses operating in the highly regulated jurisdictions of South Australia, Tasmania, Victoria and Western Australia. These businesses rely largely on full time workers who are fully trained for the tasks they undertake.</p> <p>We have, however, identified a higher level of risk for our silviculture contractors who, from time to time may rely on third party labour hire arrangements for large planting programmes. We acknowledge labour hire</p>

	arrangements can present a modern slavery risk as a result of a historical use of unskilled or vulnerable workers. As noted in our actions for FY 2022 below our contracts with our significant silviculture contractors include Modern Slavery terms that reduce this risk by requiring contractors to adhere to legal and ethical practices.
Product / Service	As noted above, our procurement of forestry management (silviculture) contractors during large planting programmes presents a higher level of modern slavery risk.
Geographic	ABP only operates in the states of South Australia, Victoria and Western Australia which are considered to have a very low risk of modern slavery.

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers, providers 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.

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. As noted above, our initial risk assessment methodology considered a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location, and specific entity risk.

In FY2021 no suppliers were identified as presenting a high risk of modern slavery as a result of this review.

Governance and accountability framework

Policies and procedures

During FY2021 we introduced a 'Child Labour Policy' which commits ABP to protecting Children from exploitation and Child Labour on ABP work sites. The policy requires ABP to adhere to International Labour Organisation (ILO) laws and Australian laws on Child Labour.

We also reviewed other relevant policies and procedures to ensure we have strong frameworks to enable us to assess and address modern slavery risks. These policies include our Recruitment and Selection Policy and our Travel and Expense Claim Policy. We also have supplier contracts addressing modern slavery and requiring contractors to adhere to legal and ethical employment and engagement practices as well as having a separate Supplier Code of Conduct.

Training

Targeted education on addressing modern slavery was identified for employees authorised to engage suppliers and all senior management.

Basic training was provided to all employees on the new child labour policy.

COVID-19

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

Assessing our effectiveness

We are committed to reviewing the effectiveness of our actions by annually reviewing modern slavery risks with senior management to identify any new risks and evaluate the effectiveness of current processes. An outcome from these reviews may include audits of contractor documentation and their employees in the field.

When commencing a new operation or engaging a new supplier, we are also committed to assessing our existing risk management processes to determine if appropriate to manage modern slavery risk.

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; and
- compliance of our suppliers who have committed to our Supplier Code of Conduct, outlined in their contract.

Consultation

During FY2021, there was consistent consultation and collaboration between both the ABP reporting entities and the entities they own and control.

This consultation was achieved through:

- Each board is comprised of common directors
- Contractor engagement is undertaken at a group level and the same policies and procedures are applied to all ABP entities.
- The Modern Slavery working group is responsible for assessing modern slavery risk for each ABP group entity.

This joint statement is issued on behalf of all ABP reporting entities by the Board of ABP Finance Pty Limited. Prior to being put to the Board of ABP Finance Pty Limited for review and approval, this statement was reviewed by the:

- CEO
- General Manager, Commercial
- General Manager, Accounting and IT
- General Manager, Human Resources

Related activities

ABP are certified with the Forest Stewardship Council (FSC) which includes annual external audits. These standards include requirements from the ILO (International Labour Organisation) which require risks relating to child labour and other social and community standards and expectations be eliminated or mitigated.

FY2022 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.

In FY2022 we will focus on

- Providing our staff with further training to ensure modern slavery understanding is embedded within our workforce.
- Targeted training has been provided already for Senior Management and individuals with authority to engage suppliers.
- Including clauses regarding identifying and managing modern slavery risk in all significant supplier contracts.

- Amending our Recruitment and Selection Policy and Travel and Expense Claims Policy following their review in FY21.

This joint statement has ABP Finance Pty Limited Board approval, in their capacity as the principal governing body for ABP Finance Pty Limited and as the parent company in the ABP group on June 1, 2022.

This statement is signed by Michael J. McFetridge in his role as a board director of ABP Finance Pty Limited on June 1, 2022.



Michael J. McFetridge