

Oji Fibre Solutions

Modern Slavery Statement 2025



Contents

Introduction and Board signatory	2
About Oji Fibre Solutions	3
Commitment to modern slavery due diligence	7
Identifying modern slavery risks	8
How we assess and address modern slavery risks	9
How we track effectiveness of our actions	12
How we have consulted our business	12

Criteria One: Introduction and Board signatory

We support global human rights and ethical employment practices and require anyone supplying goods or services to Oji Fibre Solutions to do so too. Our purpose and values are held in common across all of Oji Fibre Solutions. We aim to achieve a sustainable path to create long-term value for our people, the partners we work with, the customers we supply and the communities and environments in which we operate.

This joint Modern Slavery Statement (the Statement) has been prepared on behalf of the reporting entities Oji Oceania Management (NZ) Ltd and Oji Fibre Solutions (NZ) Ltd and the entities they own and control. References in the Statement to Oji Fibre Solutions, we, us and our, refer to the two reporting entities and the entities they own and control.

This is Oji Fibre Solutions’ sixth Statement to meet the requirements of the Australian Modern Slavery Act 2018 (Cth) (the Act) and covers the period 1 January 2025 to 31 December 2025 (reporting period).

In late 2025, Oji Fibre Solutions divested its Australian packaging business, Oji Oceania Management (AUS) Pty Ltd (Packaging Australia). As a result, Packaging Australia and certain entities it owned or controlled are no longer owned or controlled by Oji Fibre Solutions. Packaging Australia is no longer a reporting entity under the Act within Oji Fibre Solutions and is only included in this statement for the period prior to divestment.

In preparing the Statement we engaged with each of the reporting entities and consulted the entities we own or control (see Criteria Six for more detail).

Oji Fibre Solutions’ Senior Leadership Team, which includes representatives from each of the reporting entities, reviewed and agreed to the Statement prior to approval.

The Statement was then approved by the Boards of each of the two reporting entities covered by the Statement on 25 June 2026.

The Statement is signed by Masato Kawai as Chair of Oji Oceania Management (NZ) Ltd and Oji Fibre Solutions (NZ) Ltd Boards.



Masato Kawai
Chair and Director of:
Oji Oceania Management (NZ) Ltd
Oji Fibre Solutions (NZ) Ltd

Criteria Two: About Oji Fibre Solutions

Oji Fibre Solutions is New Zealand’s leading manufacturer of sustainably-sourced market pulp and fibre-based packaging solutions.

Operational changes in 2025

During 2025, Oji Fibre Solutions undertook a significant transformation of its operating model, resulting in a materially simplified business structure, a reduced manufacturing footprint, and changes to its supply chain configuration.

This transformation commenced with the closure of the Penrose Mill in December 2024, which marked the company’s exit from domestic recycled paper manufacturing. This was followed by the decision in February 2025 to cease paper production at Kinleith Mill, with the permanent shutdown of the PM6 paper machine completed at the end of June 2025.

In parallel, Oji Fibre Solutions implemented a simplified organisational and operating structure from 1 July 2025, aligning the business to two core business units manufacturing pulp and fibre-based packaging for domestic and export customers. This included streamlining corporate functions and reducing organisational complexity to reflect the narrower operational scope.

The transformation extended beyond New Zealand. On 1 November 2025, Oji Fibre Solutions divested its Australian packaging operations, transferring ownership of multiple manufacturing sites and distribution assets to two buyers. This divestment represents a significant reduction in the Group’s international footprint and removes manufacturing activities in Australia.

Finally, in December 2025, Oji Fibre Solutions completed the sale of its Fullcircle recycling business, which had previously provided nationwide wastepaper collection and processing. The divestment reflected the reduced strategic alignment of recycling operations following the closure of domestic paper manufacturing capacity.

Our Legal Structure

The below diagrams outline our legal structure on 1 January 2025 and 31 December 2025.

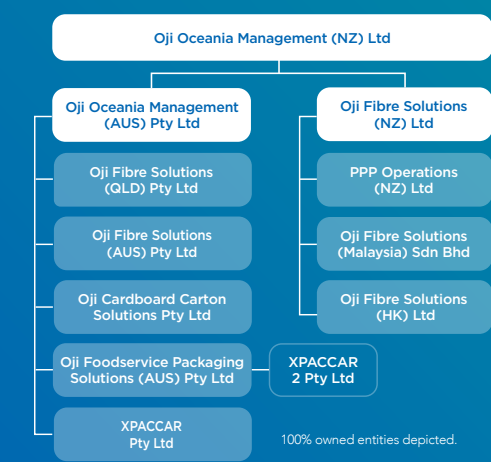


Figure 1: Oji Fibre Solutions legal structure as at 1 January 2025

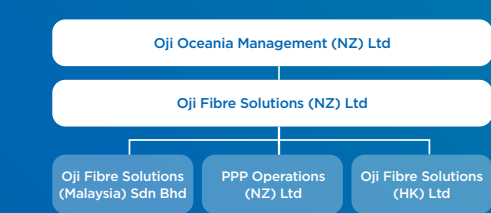


Figure 2: Oji Fibre Solutions legal structure as at 31 December 2025

The entities that make up Oji Fibre Solutions are subject to the same governance structure via our Senior Leadership Team. Each entity has related operations and are subject to the same policies and processes.

Because the reporting entities share the same legal and governance structures and operate in the same sector, the Statement provides a consolidated description of the potential modern slavery risks and actions taken to assess and address risks in Oji Fibre Solutions’ operations and supply chains.

The organisational structure of Oji Fibre Solutions is managed in three key operating business units:

- 1 Forest Resources (includes fibre supply and pulp, and previously paper and recycling until those operations ceased in 2025)
- 2 Packaging (previously included Packaging Australia until divestment in late 2025)
- 3 Corporate (this business unit includes logistics operations)

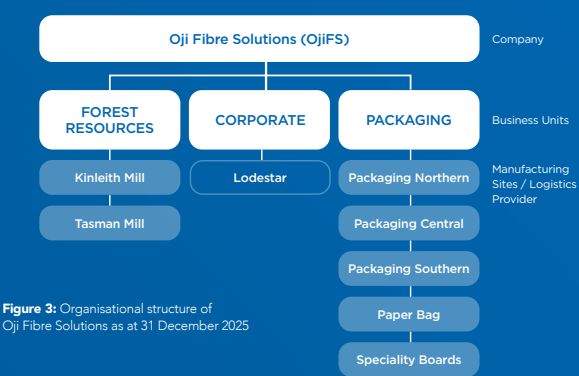


Figure 3: Organisational structure of Oji Fibre Solutions as at 31 December 2025

Our Operations

In 2025, Oji Fibre Solutions operated across the supply chain, from fibre supply through to pulp, paper and packaging manufacturing, and on to logistics and recycling.

The closure of paper manufacturing operations and the divestment of Packaging Australia and the Fullcircle business in 2025 resulted in a significant transformation of Oji Fibre Solutions' operating model, including a simplified business structure, reduced manufacturing footprint, and a reconfiguration of our supply chain. The business transitioned from a vertically integrated model to a more focused pulp and packaging operation, supported by externally sourced inputs and a reduced international presence.

As at 31 December 2025 our operations included:

- **HEAD OFFICE:** A head office in New Zealand.
- **SALES SUPPORT OFFICES:** Located in New Zealand and China (Shanghai).
- **MILLS:** Two pulp mills in New Zealand producing market pulps.
- **PACKAGING FACILITIES:** Five packaging facilities across New Zealand, manufacturing paper-based packaging solutions.
- **PACKAGING DISTRIBUTION CENTRES:** Eight packaging distribution centres. These centres across New Zealand extend our reach closer to the customers we serve.
- **LOGISTICS:** Lodestar, our integrated logistics provider provides end-to-end freight management solutions for safe and efficient delivery of products to local and global markets.

New Zealand

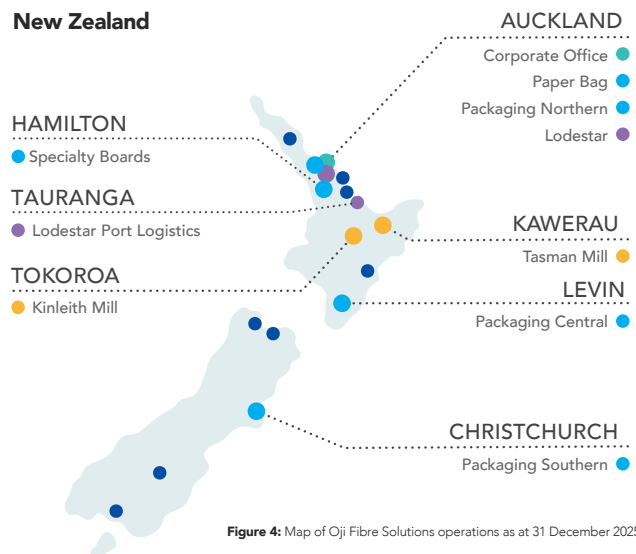


Figure 4: Map of Oji Fibre Solutions operations as at 31 December 2025

2025 involved the closure of the paper machine at Kinleith Mill, the divestment of four packaging facilities across Australia that manufactured paper-based packaging solutions, eight packaging distribution centres (including Foodservice Packaging, a distributor of food packaging items), Fullcircle, a waste recovery and recycling service, and closure of two sales support offices located in Hong Kong and Malaysia (Kuala Lumpur).

In 2025, we manufactured approximately 900,000 tonnes of pulp and packaging products, exporting approximately 700,000 tonnes to more than 30 countries and 137 ports around the world.

Our People

Our people come from diverse backgrounds and a broad range of skillsets. They are knowledgeable and experienced in the sector. 37% have chosen to stay in the business for 10 or more years.

When necessary to fill short-term vacancies, we work with labour hire firms. We recognise that we do not have the same level of oversight of those employed indirectly and, therefore, that labour hire firms can pose a higher risk of exploitative practices. As with our direct employees, we have checks and balances in place to ensure these staff have the right to work, receive fair payment for the work they do for us, are appropriately protected by employment law, and are aware of and can freely access our whistle blowing mechanism, Speak Out.

As at 31 December 2025, Oji Fibre Solutions directly employed 1,134 people with 99.8% based in New Zealand and 0.2% based in our sales support office in China. Following the divestment of Packaging Australia, we no longer have staff located in Australia. The paper sales support offices in Malaysia and Hong Kong have been closed and the associated legal entities are being dissolved.

Our Governance

We believe that to build an effective modern slavery response, we need to implement strong governance processes. Oji Fibre Solutions is committed to integrating our modern slavery strategy, policies and procedures into our broader governance structure.

At Oji Fibre Solutions, we endeavour to create a culture that encourages diversity and inclusion allowing everyone to contribute in a positive way. Our comprehensive policies are designed to

ensure fairness and equal opportunities for all. They apply to the way we treat everyone, including colleagues, contractors, customers, and suppliers.

Policies and processes embed our commitment to human rights and support the protection of human rights in our operations and supply chain, including:

POLICY	PURPOSE
Code of Conduct	Reflecting our values by setting out the high ethical standards expected of all employees.
Supplier Code of Conduct	Setting expectations of suppliers including prohibition of any form of modern slavery, forced, bonded or child labour in any of suppliers' operations and supply chain.
Procurement Policy	Committing to purchasing goods and services in a manner that is ethical.
Wood Sourcing Policy	Committing to purchasing wood-fibre from legal and well-managed forest operations.
Deforestation-Free Policy	Committing to sourcing paper-based packaging materials that are deforestation-free, with traceability and preference for certified sustainable and recycled fibre. (Approved Jan 2026)
Speak Out Policy	Promoting a culture of openness and transparency by providing access to an independent process to raise any concerns they might have about the company and its actions.
Human Rights Policy	To ensure that the fundamental human rights of all employees and people doing business with Oji Fibre Solutions are protected and upheld, including the prohibition of any form of modern slavery, forced, bonded or child labour within our operations.
Respect in the Workplace Policy (Prevention of Bullying and Harassment)	Committing to a workplace free from unlawful discrimination, harassment, sexual harassment, bullying, vilification, victimisation and adverse action.
Recruitment and Selection Policy	Ensuring a transparent, fair and equitable process based on merit and confirming valid rights to work.

Oji Fibre Solutions has an Ethics Committee with representatives responsible for acting on behalf of all reporting entities, which ordinarily comprises of:

- > Chief Legal Officer
- > Group Chief Financial Officer & GM Support Services
- > Chief Information Officer
- > Group Health & Safety Manager
- > Group Manager - Sustainability

Under the Human Rights Policy, the Ethics Committee is tasked with a key governance role, including to:

- > Monitor and review implementation and compliance of the Human Rights Policy
- > Assess the actions taken to safeguard human rights in the organisation and its supply chain
- > Investigate and recommend appropriate remedial action to the Senior Leadership Team and Board should a breach of human rights be identified within the organisation or its supply chain.

Our Supply Chain

Oji Fibre Solutions categorises goods and services procurement into five broad groupings:

- 1 raw materials;
- 2 capital;
- 3 repairs and maintenance;
- 4 energy; and
- 5 other.

Figure 5 below indicates the percentage of spend in each category.

The 'other' category includes: chemicals and starch; adhesives and inks; transport, storage and pallets; cleaning services; PPE; equipment; outsourced manufacturers; plastic packaging; and packaging goods.

2025 SUPPLIER CATEGORIES

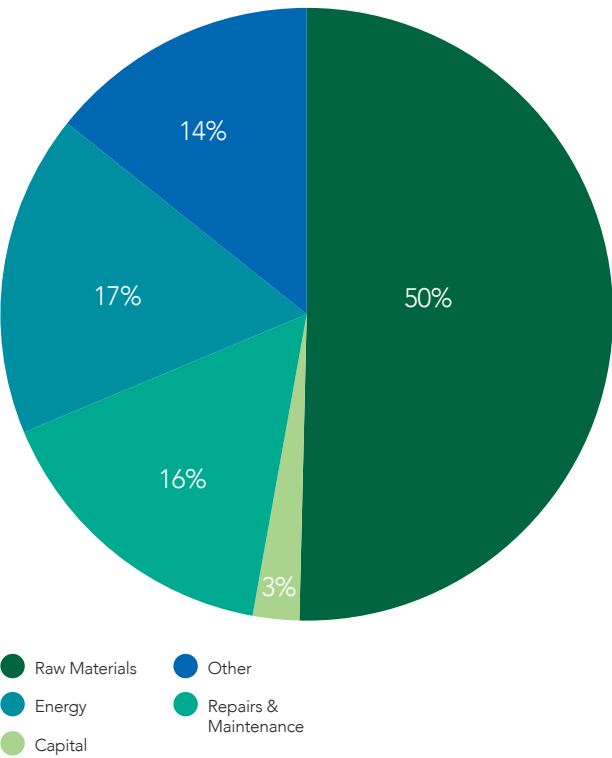


Figure 5: 2025 Goods and services procurement groupings

Commitment to modern slavery due diligence

Our Sustainability Action Plan recognises the importance of our people, our operations, and the value they create to fulfil our purpose to be our customer's best supplier.

Our reputation relies on the fair treatment and development of our people, maintaining relationships with ethical, and environmentally and socially responsible suppliers and our commitment to working with trusted and ethical clients and stakeholders.

We are committed to respecting human rights, including taking action on modern slavery.

We have adopted the following framework to manage the risk of modern slavery and to promote transparency across our business operations and supply chains.



Continuous improvement is important to Oji Fibre Solutions. To ensure we are meeting our due diligence aspirations, in 2023 Oji Fibre Solutions engaged an independent consultancy to undertake a modern slavery maturity diagnostic and inherent risk identification review.

As a result of these assessments, we established a three year+ actions roadmap to assess, address and mitigate modern slavery. In 2026, we plan to revisit our actions roadmap and consider our priority areas, especially with respect to supplier due diligence.

Criteria Three:

Identifying modern slavery risks

We are conscious of the potential exposure to modern slavery practices in our operations and supply chain.

Our modern slavery risk profile is not static. We assess our operations and supply chains for inherent risks and target our resources towards the business activities and relationships where there is the greatest likelihood of harm to people.

In 2023, the independent consultancy engaged by us undertook an inherent risk identification assessment across our operations and supply chains. This assessment evaluated the potential for the company to cause, contribute to, or be directly linked to modern slavery practises. The assessment was aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and considered four key cross-cutting risk factors to identify high risk namely: vulnerable populations; product and service categories; high-risk business models; and high-risk geographies.

The scope of the assessment was to identify potential high-risk areas across our business with further sub-category supplier assessments necessary as part of ongoing risk management. The findings have been discussed with the consultancy and internal stakeholders.

The following inherent risks were identified as part of the assessment and, aside from those relating to divested or closed entities, remain relevant today:

- > **External labour hire:** we utilise contractors and labour hire across our operations. Key risk factors include semi- or low-skilled labour and reliance on temporary workers (which may include migrant and other vulnerable workers), use of third-party recruiters and the potential risk of subcontracting.
- > **Facilities management services:** we procure facilities management services including cleaning services, on-site catering, building management and security services. The key risk factors include reliance on semi or low-skilled labour and reliance on temporary workers (which may include migrant or other vulnerable workers), use of third-party recruiters and the potential risk of subcontracting. We note increased risk in regional or rural areas and jobs performed 'out of sight' such as outside normal business hours.
- > **Machinery and equipment:** we utilise large machinery within our mills, in packaging facilities, in transport and logistics and, prior to the sale of Fullcircle, in our recycling baling sites. The key risk with machinery is the lengthy supply chain and manufacturing risks of machinery and mechanical parts, often with connection to high-risk geographies with poor labour rights protections.
- > **Transport and logistics - Domestic:** Transport is utilised by all Oji Fibre Solutions operations including the transport of virgin wood, paper reels to, and pulp bales and packaging products from, our facilities. Our logistics business, Lodestar, arranges end-to-end cargo management across road, rail, coastal shipping, international shipping and intermodal services. Transport is a high-risk category for modern slavery given the usual business practices of outsourcing services and sub-contracting, often low skilled roles and the high number of vulnerable workers including migrant workers. Low visibility of working conditions (e.g. working hour expectations of long-haul truck drivers) increase the risk of exploitation.

> **Shipping - International:** This sub-category includes the shipping and logistics suppliers engaged as part of the supply chain for Lodestar's international operations including break-bulk and container shipping. Modern slavery risks in shipping are also an inherent risk as part of supply chains in goods we procure. Shipping is a high risk of modern slavery due to an intersection of risk areas. Seafarers may be from nations with human rights, labour rights and corruption challenges. There are high rates of sub-contracting (including at port and for intermodal services) with practical limitations on effective enforcement of basic conditions on board vessels.

> **Third party procurement:** At the time of the assessment, this sub-category predominately related to goods that were purchased through our Foodservices Packaging distribution centre in Australia (which was divested in 2025). The additional divestment of Fullcircle and the end of domestic paper production reduce direct oversight over fibre sourcing and recycling activities. Other identified high-risk goods we procure include uniforms and personal protective equipment, information and technology communication hardware and branded promotional goods.

> **Recycling:** Waste management can be a high-risk area for modern slavery as it often utilises low-skilled workers including vulnerable populations such as migrant workers. Sub-contracting and the use of labour hire agencies are common. Our recycling service, Fullcircle was sold in 2025.

> **Wood Fibre:** while New Zealand is not a high risk country for illegal forestry practices, modern slavery risks can occur in the forestry sector in New Zealand given the demand for low-skilled and temporary workers (for example for planting and spraying), the use of labour agencies and sub-contractors, the use of workers from vulnerable populations, remote working conditions and value chain risks such as transport and logistics.

Impact of PM6 closure and divestments during 2025 on our risk profile

We consider the closure of our paper manufacturing and divestment of Packaging Australia and Fullcircle operations will impact our risk profile in several ways:

- > **Reduced operational complexity and footprint:** The closure and divestment of manufacturing and recycling operations have reduced the number of controlled sites and workforce exposure, particularly in higher-risk operational environments.
- > **Shift from internal production to external sourcing:** Transitioning to an imported paper model has increased reliance on third-party suppliers, including offshore manufacturers, which may elevate exposure to modern slavery risks within extended supply chains.
- > **Geographic risk rebalancing:** The divestment of Australian operations reduces direct exposure to those labour markets but may also shift procurement relationships and associated risks.



Criteria Four:

How we assess and address modern slavery risks

Oji Fibre Solutions modern slavery response is informed by the UNGPs. We understand that human rights due diligence is an ongoing process – one which is most effective when it is embedded across our business.

Our current systems and controls already address many of the risk areas identified during the assessment by the independent consultancy in 2023. In 2024, a prioritisation plan for continued assessment and mitigation of risk areas, along with a road map to build our modern slavery maturity over time was agreed. That plan sets out the actions recommended by the independent consultancy along with when the work will be implemented (2024-2026) and who will be responsible for each action.

In 2025, we progressed our approach to modern slavery, as outlined in our previous Modern Slavery Statements, with a focus on further refinement and enhancement in the following areas:

- > **Supplier Governance Framework:** We have developed a supplier governance framework that incorporates regular performance assessments and compliance checks, with a particular focus on modern slavery and human rights. In 2025, we introduced a 'Sustainability Declaration' into the New Vendor Form and a Supplier Sustainability Assessment. The Vendor Form requires suppliers to confirm upfront agreement to comply with the Oji Fibre Solutions Supplier Code of Conduct. The Supplier Sustainability Assessment captures key information to identify and assess modern slavery and broader human rights risks within each supplier and their supply chain. These documents are reviewed by the Sustainability Team to support risk identification and management.
- > **Modern Slavery Training Upgrade and Expansion:** Continued efforts to monitor modern slavery awareness training, enhancing the process with regular reporting on training completion rates. In 2025, we successfully rolled out an enhanced modern slavery training module (detailed on page 11).
- > **Policy Development:** Developed a Deforestation-Free Policy to reinforce the Packaging business unit's commitment to sourcing deforestation-free paper. This was required following the transition from an integrated paper supply, via the Kinleith Mill, to external third-party suppliers. Previously, compliance with our deforestation-free commitment was achieved under the Wood Sourcing Policy. Board approval for the new policy was obtained in January 2026.
- > **Policy Review:** Finalised the review and obtained Board approval of our Human Rights Policy to ensure alignment with international standards, including the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UNGPs, and the Ethical Trading Initiative (ETI) Base Code.

Responsible sourcing

Our Supplier Code of Conduct, Procurement Policy, Wood Sourcing Policy and Deforestation-Free Policy (approved in January 2026) govern our responsible sourcing commitments.

We expect all suppliers to operate ethically and act in an environmentally and socially responsible manner. Suppliers must comply with all applicable national, state or regional, and local laws and regulations in the countries in which they operate. All suppliers to Oji Fibre Solutions are expected to hold their employees, contractors, sub-suppliers, agents and distributors to the obligations of the Oji Fibre Solutions Code of Conduct.

Our Supplier Code of Conduct expects our suppliers to:

- > Comply with all applicable laws in the countries in which they operate
- > Undertake ethical business practices
- > Avoid the procurement of wood from unacceptable sources
- > Protect human rights and labour standards
- > Prioritise workplace health and safety and provide secure, safe and healthy work sites
- > Manage their business in an environmentally responsible manner
- > Commit to open communication and positive relationships with the local communities in which they operate.

The Oji Fibre Solutions Supplier Code of Conduct is publicly available on our website and is communicated to all suppliers. Suppliers are required to confirm their agreement to the Code, which is incorporated into our standard supplier contracts, purchase orders, and new vendor onboarding processes. Compliance is managed through supplier relationships and enforced through our supplier contracts, with non-compliance addressed as per terms in that contract.

Raw Materials

50% of our 2025 spend was on raw materials. Our raw material suppliers together with the majority of our tier one suppliers are predominately based in New Zealand (~70%) and Australia (~15%). However, we do have suppliers (both tier one and beyond) in a range of other countries.

Responsible Sourcing of Wood Fibre

Oji Fibre Solutions wood-fibre is sourced from the North Island of New Zealand. Our wood-fibre supply is sourced from legal and well-managed forest operations in accordance with our Wood Sourcing Policy. The Wood Sourcing Policy adheres to Forest Stewardship Council® (FSC®) and Programme for Endorsement of Forest Certification (PEFC) certification.

Our wood-fibre inputs are sourced from sustainably managed forests in New Zealand with 84% in 2025 certified to FSC® and PEFC standards. The remaining 16% meets the requirements for 'controlled wood' under FSC® or 'controlled sources' under PEFC criteria.

Paper Supplier Sustainability Assessment

As our supply chain continues to evolve, understanding the environmental and social practices of our suppliers remains important to responsible sourcing at Oji Fibre Solutions. Building clarity around areas such as environmental management, labour conditions, human rights, and modern slavery helps us identify potential risks and respond appropriately.

In 2025, we introduced a new supplier evaluation tool to support the onboarding of our new paper suppliers. The evaluation drew on information from recognised social compliance platforms, including SEDEX and EcoVadis, and considered each supplier's approach to modern slavery, human rights, greenhouse gas reporting, emissions reduction targets, and how they manage deforestation risks. This process strengthens our understanding of suppliers that support key customer expectations, including no-deforestation requirements. We had a response rate of 100%.

Responsible Business Practice

As a member of SEDEX (Supplier Ethical Data Exchange), we complete Self-Assessment Questionnaires (SAQs) and undergo SMETA (Sedex Members Ethical Trade Audit) 4-Pillar audits to support our customer requirements. SMETA is a widely recognised social compliance audit methodology that assesses labour standards, health and safety, environmental management, and business ethics—referred to as the 4-Pillars.

In 2025, no third-party SMETA 4-Pillar audits were conducted at our facilities; audits completed in the prior year remained valid. The 2024 audits, at five of our packaging facilities in both Australia and New Zealand, included private employee interviews and evaluated compliance with employment and labour laws, including compensation and benefits, working hours, grievance mechanisms, human rights, recruitment, and business integrity. In addition, the audits assessed supplier management practices, ensuring that due diligence procedures were in place to evaluate and mitigate risks related to modern slavery, child labour, and other unethical practices within the supply chain.

The audits did not raise any ongoing human rights risks or concerns. All other concerns identified were quickly resolved. The audits specifically recognised our comprehensive human rights policies, review of our stakeholders and suppliers and the open dialogue we maintain with unions.

Capability building

In 2025, we set a target of 100% completion of the modern slavery awareness training for employees in targeted roles—commercial, human resources, supply chain management, procurement, and group governance. By 31 December, we reached 94% completion and therefore did not meet our year-end target. The remaining two employees completed the training shortly thereafter, bringing total completion to 100%.

In 2024, we began enhancing our existing online training with content developed in partnership with Law of the Jungle, experts in eLearning education. In 2025, the updated module was successfully rolled out, delivering a more interactive learning experience that covers the potential impact of modern slavery on our operations, relevant legal frameworks, risk identification, and reporting procedures.

The training incorporates real-world examples, tailored scenarios, and clear red flags to help employees recognise risks in practice. It also uses familiar language aligned with our Better Business training suite, ensuring consistency and ease of understanding across all modules.

To reinforce learning outcomes, the module includes randomised quizzes to test knowledge, alongside a refresher quiz scheduled every two years to maintain awareness and capability over time.

To broaden modern slavery risk awareness, we expanded the rollout to all employees on individual employment agreements. Participation increased from 77 employees in 2024 to 538 in 2025, an almost 600% increase in reach. While no formal target was set for this wider group, 83% of employees completed the training.

Grievance mechanisms

Should it become evident that we are causing, contributing to, or directly linked to, human rights issues, we will engage in dialogue with those concerned and strive to remedy the situation through appropriate procedures.

If the laws and regulations of a country differ from international human rights norms, we will adhere to the higher standard.

Speak Out

Should any of our people, contractors or suppliers be concerned about their rights, how they are treated or any other aspects of our operations, they can freely access our whistle blower mechanism - Speak Out. All concerns are treated confidentially and are investigated by the Oji Fibre Solutions' Ethics Committee.

The Speak Out Policy includes safeguards for protecting complainants from reprisal, including confidentiality and protecting them from personal disadvantage or victimisation for having raised a concern.

The reports received from Speak Out enable us to review the information for any trends and take any necessary action. We have not identified any reports related to modern slavery for the reporting year from this reporting mechanism. Employee awareness of Speak Out is important to us. Speak Out is communicated through posters, the intranet, inductions and company- wide communications and updates.

Oji Holdings Corporation Human Rights Reporting Desk

Oji Holdings Corporation has become a member of the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) and has established a human rights reporting desk through the "Engagement and Remedy Platform." This desk is available to all stakeholders, including suppliers working with Oji Group companies, and allows them to submit consultations on issues related to business and human rights. These include concerns such as the prohibition of forced labour and child labour, the elimination of discrimination, freedom of association, and the provision of a safe and healthy working environment, all through a web-based reporting form.

CONTACT US:



<https://jacer-bhr.org/application/form.html>

*Reports are accepted in Japanese and English.

*We do not accept reports or consultations by phone.

Criteria Five:

How we track effectiveness of our actions

We want to ensure the actions we are taking to manage our modern slavery risks actually work. We take a range of steps to assess the effectiveness of our policies, procedures and modern slavery response. As we continue to increase our modern slavery engagement across our business, we are continuing to learn about how to enhance our effectiveness.

The Oji Fibre Solutions sustainability, human resources, procurement and internal audit functions play key roles in doing this.

Assessments include:

- > Confirming direct employees possess and maintain their legal entitlement to work.
- > Checks and balances over our internal remuneration, payroll overtime and leave systems.
- > Confirming with labour hire firms that any workers provided are legally entitled to work and they are appropriately remunerated for the work they do for the business.
- > Reviewing the licenses of the labour hire providers we use for this service in Australia to ensure a current licence is held.
- > Holding long-standing relationships with our main labour hire firms and maintaining regular engagement with them.
- > Appropriate separation of duties in our governance systems and operational processes.
- > Governance of supplier relationships and performance.
- > Monitoring successful completion by employees of internal training on our policies and modern slavery awareness raising.

Our owner, Oji Holdings Corporation, also reviews our management controls. This includes assessing that our labour and supply chain policies are clear, maintained and followed. More information on Oji Holdings Corporation can be viewed at ojiholdings.co.jp/english/

Criteria Six:

How we have consulted our business

The development of this statement was led by our sustainability team, who consulted directly with key functions across Oji Fibre Solutions to draft the statement.

We engaged with each of the reporting entities and consulted the entities we own or control throughout the drafting process. Oji Fibre Solutions' Senior Leadership Team, which includes representatives from each entity, reviewed and agreed to the Statement prior to approval from the Oji Fibre Solutions Board.

