

Oji Fibre Solutions



Modern Slavery Statement 2020

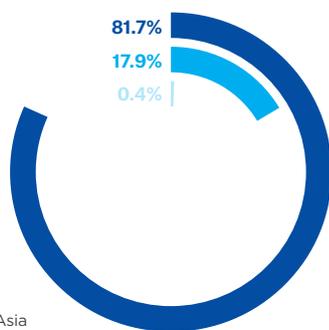
About Us

Oji Fibre Solutions is one of Australasia’s leading producers of market pulp, paper and fibre-based packaging.

We are a vertically integrated business, employing around 1,800 people. Our operations include:

- Three mills in New Zealand producing market pulp and containerboards.
- Ten packaging operations across New Zealand and Australia providing paper-based packaging solutions – boxes, multiwall bags, paper cups and specialty boards.
- A logistics service providing national and international transport solutions.
- A paper and cardboard recycling service with 14 bailing sites across New Zealand, which supplies recovered fibre to our paper mills for reprocessing.

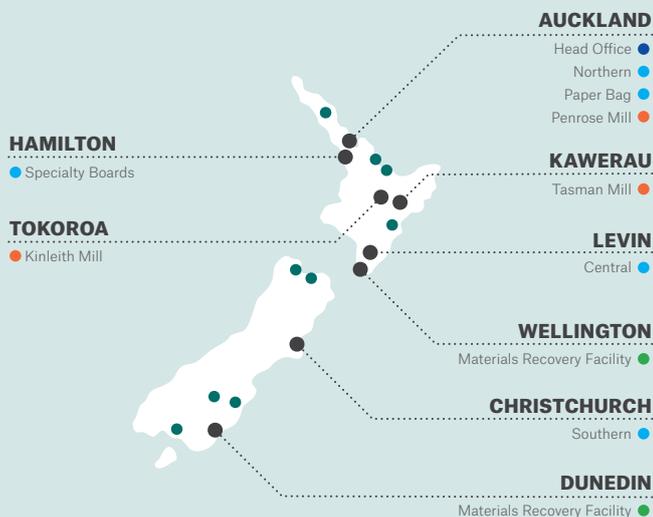
EMPLOYEE LOCATION



- Asia
- Australia
- New Zealand

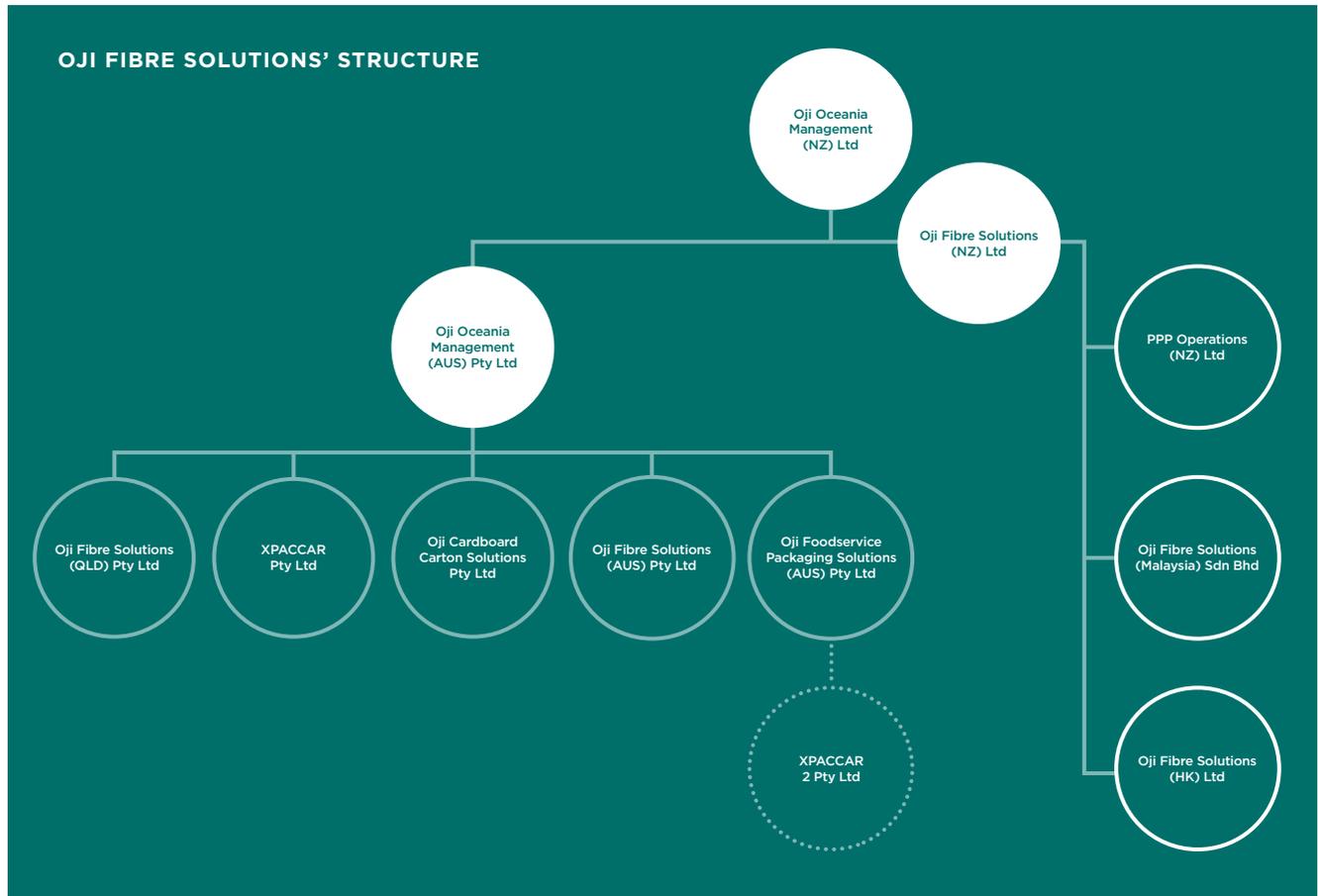


OJI FIBRE SOLUTIONS' FACILITIES



- Head Office
- Mill
- Packaging Facility
- Materials Recovery Facility
- Distribution Centres

This is our first public Modern Slavery Statement. It covers all the entities within Oji Oceania Management (NZ) Ltd¹, which are together known as Oji Fibre Solutions.



The main raw material input to the products made by Oji Fibre Solutions is wood-fibre grown in New Zealand.

Forest Stewardship Council® (FSC®) and Programme for Endorsement of Forest Certification (PEFC™) Chain of Custody (CoC) certifications are held by all our manufacturing sites.

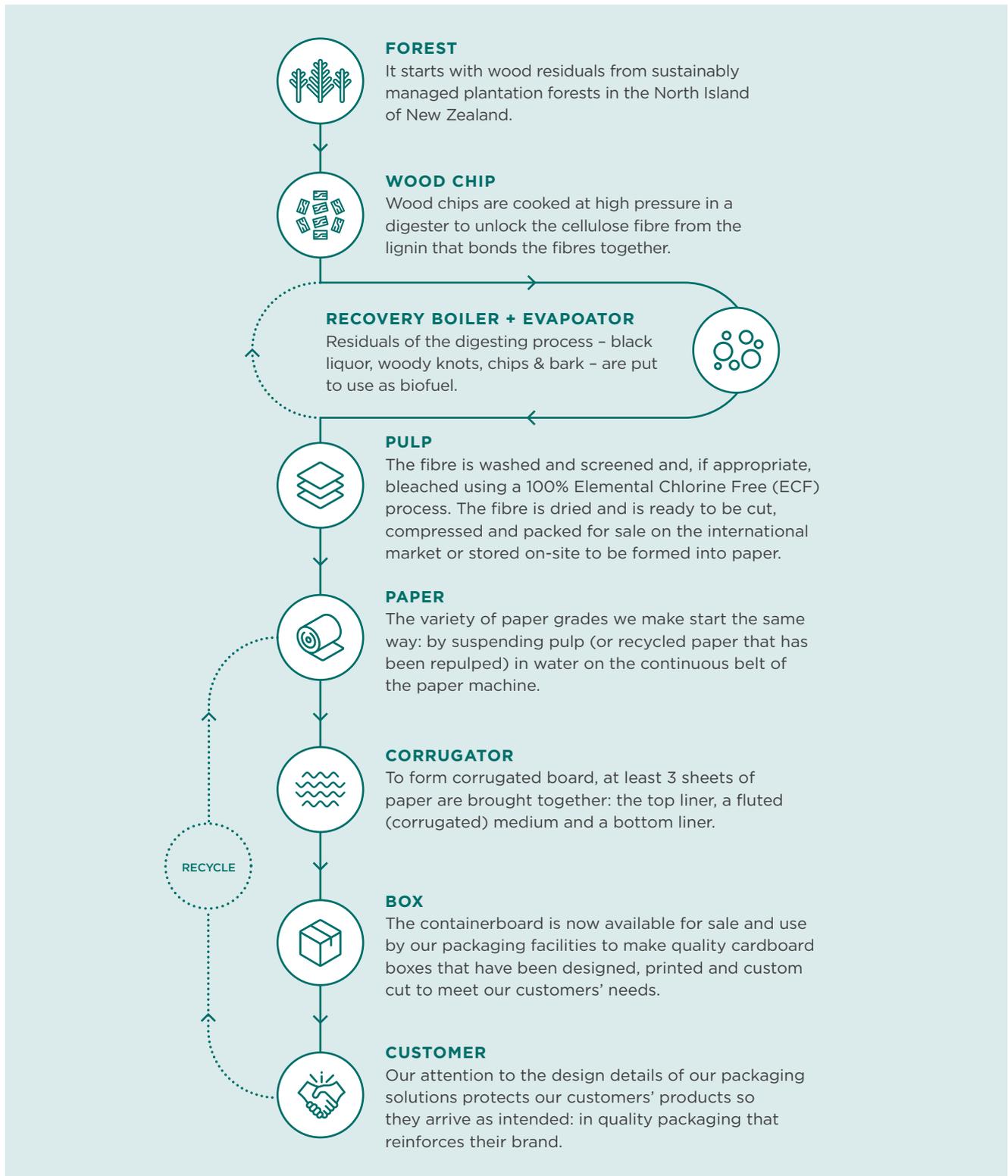
These certifications provide third party assurance to internationally recognised standards, about the origin of wood-fibre products being from legally harvested, non-controversial forestry sources. They also provide a level of assurance against human rights abuses.

When required to supplement our own manufacturing operations, we purchase from CoC certified suppliers.

Our suppliers are predominantly based in New Zealand, Australia and Asia. We are proud of the long-term relationships we have with many of them.



Oji Fibre Solutions' manufacturing processes start with wood residuals from sustainably managed forests.



We design and deliver packaging solutions to protect our customers' products, so they arrive as intended.

Our Absolute Commitment

Ethical Business Practices and Responsible Supply Chain Management

Our values of being a trusted partner, built on strength, innovative and future focused guide our actions. We are committed to all business dealings being conducted legally and ethically and we constantly strive for the highest standards of service.

Policies and Practices Addressing the Risks of Modern Slavery

There is no place for any form of modern slavery within Oji Fibre Solutions' operations or supply chain. We support global human rights and ethical employment practices and require our suppliers to do so too.

At Oji Fibre Solutions, we endeavour to create a culture that encourages diversity and allows everyone to contribute in a positive way. We expect our working environments to be characterised by mutual trust and respect, where everyone is treated fairly, and people strive to do the right thing by one another.

Our employment policies and procedures are designed to ensure fairness and equal opportunities for all. They apply to the way we treat everyone, including colleagues, customers and suppliers.

The following Oji Fibre Solutions' policies work together to support labour standards and safeguard against modern forms of slavery in our operations and supply chain.



POLICY	APPLICATION / PURPOSE
Oji Fibre Solutions' Code of Conduct	Reflects our values by setting out the high ethical standards expected of all employees and providing clear guidelines.
Better Business Policy Statement	Salaried employees are required to complete our Better Business online training programme. The purpose of this training is to equip our people with the knowledge and resources enabling them to better identify, manage and minimise legal risks to the business and its employees.
Equality Employment Opportunity Policy	Outlines the company's commitment to providing employees with equal opportunity to achieve their full potential without fear of discrimination or harassment.
Recruitment and Selection Policy	Sets out the recruitment and selection process, including any offshore recruitment activity and the requirement for all preferred candidates to provide evidence of their valid rights to work.
Internal policies related to the creation of a respectful workplace and the prevention of workplace harassment, violence and bullying	These policies provide the framework for employees, potential employees, visitors and contractors to understand how our company expects everyone to treat each other in the workplace and what is not acceptable behaviour.
Grievance and Resolution Policy (Australia)	Guides the procedure to manage employee grievances, with the aim of promoting a fair and consistent approach and to provide support to those involved in the process.
Speak Out Policy	Aims to encourage and promote a culture of openness and transparency by providing employees and contractors with an independent process to raise their concerns.
Supplier Code of Conduct	Sets out the expectations we have of all suppliers in our supply chain to operate legally and responsibly. It prohibits the use of any form of modern slavery, forced, bonded or child labour in any of our suppliers' operations and supply chain.



Assessing our Commitment

Part of holding our business to high standards is to review how our policies are being implemented. Our Human Resources and Internal Audit functions play key roles in doing this. Assessments include:

- Confirmation that all direct employees maintain their legal entitlement to work.
- Checks and balances over our internal remuneration, payroll and leave systems.
- Confirmation from all labour hire firms that any workers provided are legally entitled work and they are appropriately remunerated.
- Review the licenses of the labour hire providers we use for this service in Australia to ensure a current license is held.
- Appropriate separation of duties in our processes.
- Monitoring successful completion by employees of internal training on the Oji Fibre Solutions' policies.
- Review by our owner, Oji Holdings Corporation, that labour policies are clear, are maintained and are followed.

We hold long standing relationships with our main labour hire firms and we maintain regular engagement with the firms we work with.

We are also a member of SEDEX, a global membership organisation helping companies to drive improvements in business practices within their supply chain. In 2018, our business benefited from a third-party audit at one of our New Zealand manufacturing sites of workers' health and safety and their rights, and our business ethics and environmental impact. The audit found there were no instances of human rights non-compliances.

If any of our people or contractors are concerned about labour rights, or any other aspects of Oji Fibre Solutions operations, they can freely access our whistle blower facility- Speak Out. All concerns are treated confidentially by a third-party provider and investigated by the Oji Fibre Solutions' Ethics Committee.

Expectations of our Supply Chain

We recognise that our good reputation depends on our relationships with our suppliers and on managing the impacts of our supply chain.

All suppliers are expected to share our values and drive for sustainable outcomes and continuous improvement.

Supplier Code of Conduct

In 2019, we introduced our Supplier Code of Conduct. We have long held the expectation that our suppliers be ethical, environmentally and socially responsible. This expectation is set out formally in our Code, for direct and indirect suppliers.

Our expectations regarding labour and human rights align with recognised international labour standards as defined by the International Labour Organisation (ILO) core labour standards, United Nations declaration on Human Rights, Ethical Trading Initiative (ETI) and UN Global Compact to prohibit any form of child or forced labour in any supplier operations or activities.

This Supplier Code of Conduct is part of our supplier relationships, and a key element in our modern slavery due diligence framework.

Due Diligence and Risk Management Procedures

Recent key actions

We are committed to engaging with our suppliers to promote respect for human rights and to further strengthen our joint approaches to addressing the risks of modern forms of slavery.

When we bring on board a new major supplier, a pre-qualification assessment of their governance and operations is carried out. Through this assessment we gain an understanding of the potential supplier's ability to meet our requirements and potential risks in their operations.

In response to the growing understanding of modern slavery, we have enhanced longstanding processes for on-boarding suppliers and to ensure adoption of the quality and sustainability standards expected by the company across our supply chain.

Over the last two years, Oji Fibre Solutions has added to our responsible sourcing systems and processes to enhance our compliance with the Australian Commonwealth *Modern Slavery Act 2018*.

FSC® and PEFC™ CoC certification extended to all our manufacturing sites

In 2018/19 the business took the strategic decision to extend third party assurance of our fibre sourcing provided by FSC® and PEFC™ CoC certification from our two primary sites of Kinleith and Tasman Mills to all our manufacturing sites along our value chain. In 2020, all our manufacturing sites achieved CoC certification to FSC® and PEFC™ standards.

Oji Fibre Solutions Code of Conduct introduced

In 2019, we introduced our Supplier Code of Conduct. The requirement for suppliers to comply with the standards in this Code are included in our contract and purchase order terms.

Due diligence extended

In 2020, we recognised the opportunity to further systematise and connect processes to mitigate salient human



rights risks in our supply chain, including extending our due diligence frameworks to modern slavery.

The risks of modern slavery within our supply chain are assessed under geography, sector, product pathways and length of supplier relationship with our business.

We rely on our suppliers to support us in our supply chain due diligence. If necessary, mitigating controls are advanced with suppliers. However, in the case of severe breaches of our standards we will terminate the relationship.

Our focus is now on maintaining and upholding high standards across our value chain.

Towards the future



Oji Fibre Solutions is committed to zero tolerance of human rights violations.

In 2021, we are further enhancing our approach to protecting human rights in our business and supply chain in the following ways:

- The compulsory training modules that our people complete are being updated to create a shared understanding of the issue of modern slavery and the implications for Oji Fibre Solutions and our supply chain. Our employees are being reminded of where to access help if

they are concerned about their own experiences or those of people in their wider social network.

- Review of Oji Fibre Solutions' procurement policy.
- Continuing to roll out our Supplier Code of Conduct and associated due diligence mechanisms.
- Our approach to managing the risks of modern slavery in our supply chain will be strengthened through an external review of our risk assessment framework.

Approval

This is our first public Modern Slavery Statement to meet the reporting requirements under the Australian Commonwealth *Modern Slavery Act 2018*. It is made pursuant to Section 14 of that Act.

This Statement describes the steps taken by Oji Fibre Solutions during the

reporting period to raise awareness of the potential for modern slavery in our operations and supply chain. It also outlines the steps taken to mitigate this risk.

The Oji Fibre Solutions' Board approved this Statement on 25 June 2021.



Jon Ryder
Chief Executive Officer



¹ Oji Fibre Solutions ("OjiFS") includes: Oji Oceania Management (NZ) Ltd, Oji Fibre Solutions (NZ) Limited, Oji Oceania Management (AUS) Pty Ltd, Oji Fibre Solutions (QLD) Pty Limited, Oji Fibre Solutions (AUS) Pty Limited, Oji Foodservice Packaging Solutions (AUS) Pty Limited, Oji Cardboard Carton Solutions Pty Limited, XPACCAR Pty Ltd, XPACCAR 2 Pty Ltd, PPP Operations(NZ) Ltd, Oji Fibre Solutions (HK) Limited, Oji Fibre Solutions (Malaysia) Sdn Bhd.