

## **MODERN SLAVERY<sup>1</sup> POLICY**

Rayonier New Zealand Limited, manager of the Matariki Forestry Group, which includes Matariki Forests and Matariki Forests Trading Limited (together commonly referred to as "Rayonier Matariki Forests" or "RMF") is committed to conducting its business operations in an ethical and responsible manner.

RMF recognizes that continuing action is needed to identify, address and eradicate all forms of modern slavery in its business and supply chain.

While Rayonier New Zealand Limited currently employs approximately 100 staff to manage RMF, the majority of RMFs operational activities are carried out by Contractors. The number of Contractors (including employees) varies during the year but ranges from approximately 600-800 persons.

A cornerstone of RMF's mission is being a beneficial partner to the communities in which it operates. This is not just about working closely with stakeholders and local communities; it is also being:

- A. Watchful of any practices that might deprive people of their human and labour rights; and
- B. Vigilant to the risks of damage that Modern Slavery could cause if this practice were to infiltrate RMF's supply chain.

We recognize that for those parts of RMF's supply chain which are domiciled in New Zealand, the risk of Modern Slavery is considered to be low. This is because New Zealand law prohibits the exploitative practices considered to comprise Modern Slavery. RMF's contractor work force is relatively settled, skilled and fairly remunerated, suggesting it is less likely to be susceptible to Modern Slavery than those supply chains which use low skilled or transient labour in their supply chain.

In its capacity as a service provider to AVA Timber LP (AVA) and at the direction and on behalf of AVA, RMF also secures offshore services from third parties such as vessel chartering and in-market sales agency services in markets which are considered to have a higher risk of Modern Slavery. This policy is therefore subject to the AVA Modern Slavery Policy in respect of the provision of these offshore services and to the extent of any inconsistency between the two policies.

Our objective is to ensure that the risk of Modern Slavery practices occurring in both RMF and AVA's supply chains are, to the fullest extent possible, minimized or eradicated. We will achieve this by:

Identifying high risk countries or industries where modern slavery is prevalent.

<sup>&</sup>lt;sup>1</sup> In the context of this Policy Modern Slavery means the exploitative practices of people trafficking, slavery and slavery-like practices including forced labour, debt bondage and involuntary servitude. These practices are currently outlawed under various pieces of New Zealand legislation (Crimes Act, Immigration Act). Recent New Zealand examples of these practices tend to involve immigrants being brought to New Zealand from third world countries under false pretenses relating to type of work, working and living conditions and freedom to leave at any time (by withholding passports). RMF does not engage in, support, or tolerate the use of forced labour (including modern slavery and human trafficking) or child labour within our operations or those of our contractors.

<sup>&</sup>quot;Forced labour" occurs when individuals are compelled against their will to provide work or service through the use of force, fraud, or coercion.

<sup>&</sup>quot;Human trafficking" involves the use of force, fraud, or coercion to obtain some type of labour or commercial sex act.

<sup>&</sup>quot;Child Labour" is mentally, physically, socially, or morally dangerous and harmful to children and/or interferes with their schooling

- Working with AVA where appropriate, make employees and suppliers aware of the existence and risks of Modern Slavery, clearly communicate AVA and RMF's common position on this practice and provide appropriate literature where necessary to achieve this objective.
- Continuing to support and comply with relevant New Zealand Government initiatives.
- Consistent with the principle of continuous improvement, this Policy will be reviewed biennially.

## Breach

If any person suspects there is a risk that a contractor or supplier to RMF is engaging in Modern Slavery practices, that person should communicate their concerns to RMF by either:

- emailing information to https://www.matarikiforests.co.nz/contact-us/
- contacting RMF in person

Any breach of this Policy shall be investigated by RMF to achieve a satisfactory outcome reflecting the principles of this Policy, and the investigation and its outcome shall be documented.

Should we become aware that any Contractor or Supplier does not meet RMF's expectations in respect of ethical practice, RMF will engage directly with that party and develop an action plan to remedy any breachs in a transparent, timely and efficient manner. If the Contractor or Supplier is not cooperative, RMF may consider taking steps to end the business relationship, having regard to the particular circumstances, and report the case to the appropriate authorities if necessary.

## Responsibilities

- RMF senior management holds overall responsibility for the implementation of this Policy.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and the issue of modern slavery in supply chains.

Alistair Brown

**Managing Director** 

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