



Programme for the Endorsement of Forest Certification™ (PEFC™) Policy Chain of Custody (CoC)

The company processes log resources and exports high quality woodchips from the Port of Bunbury.

The PEFC CoC Principles and Certification provides an objective basis of assessing quality based management applied across land and plantations, incorporating sound environmental practices, taking into account conservation, social, cultural and economic values.

The Company commits to manage its operations and produce export woodchips according to the PEFC CoC Principles.

To achieve those company objectives and comply with the PEFC CoC Principles, the Company will manage its operations through the following standards and approaches:

- Adherence to Australian and Western Australian legislation and regulatory requirements
- Compliance with Codes of Practice relevant to operations
- Apply a quality-based management approach to all operational aspects including key procedure documentation (Plans and Manuals)
- Establish divisional environmental objectives and manage operations with sensitivity to environmental protection principles
- A strong emphasis on community consultation associated with operations, including a formal procedure to deal with complaints and grievances
- Protect all known cultural sites within operational areas
- Detailed planning and management applied to every phase and operation undertaken
- Appoint suppliers and contractors who comply with the Company's standards and environmental practices
- Provide safe working places and practices including adequate personnel training
- Apply risk management to all activities with the objective of minimising and where possible, eliminating damaging environmental and personal impacts
- Use operational monitoring and audits, including incident management and clearly defined response levels
- Apply continuous improvement to procedures and planning for all operations

- Maintain a strict Chain of Custody system from resource acquisition to ship loading. This involves a thorough confirmation that PEFC certified timber meets PEFC requirements of:
 - Assured legal ownership of the timber and certainty that it has not been illegally harvested.
 - The timber does not come from genetically modified trees.
 - The harvesting has not violated traditional or civil rights.
 - The timber does not come from endangered or high conservation value forests.
 - The plantation was not developed on land that was cleared of native forest after 1994.
 - Maintain full documentation to the point of sale in order to maintain the PEFC "Credit" labelling.
 - Non violation of ILO Core Conventions as defined in the ILO Declaration of Fundamental Principle and Rights of Work, 1998
- Shall not knowingly permit unauthorised or illegal harvesting, hunting, fishing, trapping, collecting, settlement or other unauthorised activities

The elements of this commitment are further incorporated within the Company's Corporate and Divisional Policies.

The Company has a document management approach that maintains up-to-date policies, guidelines, manuals and plans. Some of these documents are available through the public web site, or can be made available by specific request to the company.



Tomoharu Kurokawa

Director 28/06/2019



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Director 28/6/19