

## 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 RMF's 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), 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.

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.
- Together with AVA where appropriate, making employees and suppliers aware of the existence and risks of Modern Slavery, clearly communicating AVA and RMF's position on this practice and providing appropriate literature where necessary to achieve this objective.

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<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. “Forced labour” occurs when individuals are compelled against their will to provide work or service through the use of force, fraud, or coercion. “Human trafficking” involves the use of force, fraud, or coercion to obtain some type of labour or commercial sex act. “Child Labour” is mentally, physically, socially, or morally dangerous and harmful to children and/or interferes with their schooling

- Undertaking appropriate due diligence/risk analysis and using the results of that due diligence/ analysis to develop a plan with each affected supplier to either eliminate Modern Slavery from that party's operations or to discontinue business with that party.
- Requesting that suppliers disclose their own modern slavery policies and processes.
- Continuing to support external certification programmes which require demonstrable good practice and discourage any exploitative practices. Current examples of such programmes are the Safetree safety certification, and the Forest Stewardship Council and PEFC environmental certification programmes.
- Ensuring procurement and contract management processes follow best practice having regard to the objective of minimizing or eradicating Modern Slavery risks.
- Working with AVA clients that have statutory Modern Slavery reporting requirements to ensure that those requirements are met in a complete and timely manner.
- Continuing to support and comply with relevant New Zealand Government initiatives.
- Ensuring that RMF's actions continue to align with best practice by reviewing this Policy on a biennial basis.

#### **Responsibilities**

- The RMF Board of Directors holds overall responsibility for the implementation of this Policy and associated procedures.
- all employees will be provided this policy and informed of their obligations related to it and will have appropriate channels to communicate any concerns they have.



Alistair Brown  
**Managing Director**

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