

**Modern  
Slavery  
Statement  
FY24**

# Timberlink Australia has zero tolerance for any form of slavery in its supply chain.

## About Timberlink Australia – Structure, Operations and Supply Chain

This statement covers Timberlink Australia Pty Ltd ('Timberlink') which is a large Australian proprietary company limited by shares. Timberlink is a reporting entity for the purposes of the *Modern Slavery Act 2018* (Cth) (the 'Act'). Its national office is in Melbourne, Victoria. Timberlink has a wholly owned subsidiary company, Timberlink New Zealand Ltd, domiciled in Christchurch, New Zealand (together with Timberlink, the 'Group').

### Structure

The Group is owned by the Australia New Zealand Forest Operating Fund, managed by New Forests Asset Management Pty Ltd ('New Forests'). New Forests manages approximately AUD 11.7 billion in assets globally with a diversified portfolio of sustainable timber plantations and conservation areas, carbon and conservation finance projects, agriculture, timber processing and infrastructure. This integrated timber supply model provides the Group with a sustained level of supply security from the 'forest to the frame' and accounts for a significant portion of procurement spend in FY24.

Since Timberlink's inception in 2013, the Group has grown to become one of the largest softwood pine timber manufacturing and distribution business in Australia and New Zealand employing 645 direct employees with 82% of the employee base from regional communities. Approximately two-thirds of employees are on Enterprise Bargaining Agreements with the remaining employee base on either negotiated employee contracts or Modern Awards.

### Operations

The Group's manufacturing operations are based in regional Australia. Timber is sourced from Timberlink's two sawmills - located geographically near to sustainable softwood pine plantations that supply the mills - Bell Bay in Tasmania and Tarpeena in South Australia. Timber sales are then facilitated through a national and New Zealand sales and distribution network with centres in Adelaide, Melbourne, Perth, Sydney and Christchurch (NZ) (sales office only).

Timberlink will continue to service both the Australian and New Zealand markets as well as Asia.

Broadly speaking, Timberlink customers include timber merchants, large Truss and Frame manufacturers and contractors (NeXTimber®) for the building construction, packaging, and pallet manufacturing industry. Timberlink's plantation pine products for indoor and outdoor use are suitable for building construction, renovation projects and other industrial manufacturing applications including packaging, pallets, and furniture components. The highly sought-after woodchip is also used in the manufacturing of paper products.

### Supply Chain

The Group operates a decentralised purchasing organisation within the Group's established procurement framework.

One of the largest categories of expenditure is log supply, responsible for 44% of the Group's overall procurement spend. The majority of log procurement expenditure is sourced from businesses within the Australian forestry funds managed by New Forests. This integrated supply chain managed by New Forests

provides the platform for a consistent supplier value system across an integral part of the supply chain significantly reducing the risk of modern slavery in this area. The majority of the Group's remaining procurement spend is attributable to:

- Plant and equipment;
- Spare parts and maintenance;
- Transport and logistics;
- Third Party manufactured finished products;
- Consumables; and
- IT software/hardware.

## Risk of Modern Slavery in Supply Chain

During the reporting period, Timberlink continued its Modern Slavery program that entailed the continued application of the Modern Slavery due diligence questionnaire. Building on the FY23 program, Timberlink continued the due diligence process with all new suppliers onboarded in FY23 risk assessed for Modern Slavery after completing the Modern Slavery questionnaire. To date 67% of our suppliers<sup>1</sup> have completed the questionnaire accounting for 77% of procurement expenditure.

The following key areas of modern slavery risks have been identified in our supply chain:

1. Sourcing product directly from overseas suppliers e.g., plant and equipment and asset spare parts.
2. Sourcing from multinationals with a local presence e.g., saleable product and consumable chemicals.
3. Local retailer/distributor sourcing product from overseas (i.e., Tier 2 supply) e.g., uniforms and technology.

The Group assesses its overall risk to modern slavery as being low but continues to assess potential risk areas based on geographic location, industry, and type of product.

### Geographic Risks

The majority of supply chain procurement expenditure is local to the business operation, which is in Australia and New Zealand, suggesting a lower risk to modern slavery within first-tier suppliers. Notwithstanding this Timberlink acknowledges that Australia and New Zealand are not immune to modern slavery practices. Analysis of questionnaire responses revealed that approximately 87% of suppliers (attributable for 72% of total FY24 procurement expenditure) operate in Australia and/or New Zealand only.

Timberlink does source some products directly from overseas jurisdictions which carry an increased risk that the Group may be indirectly linked to modern slavery. Timberlink's Modern Slavery due diligence process has provided greater visibility to this risk and will continue to do so as the company progresses with its Modern Slavery program.

Analysis of the completed due diligence questionnaires as well as a desktop review of suppliers with known overseas billing details has revealed approximately 7% of suppliers with whom Timberlink has engaged over the reporting period have overseas operations. This accounts for 6% of total procurement expenditure. Conservatively, and for the purpose of this statement, it is assumed that the offshore operational activity of these suppliers' forms part of Timberlink's supply chain accepting that this may not be the case with all suppliers. Notwithstanding this, the countries identified as having a higher risk based on the Global Slavery Index<sup>2</sup> are within the regions of South America, Middle East, Asia, and Africa and are attributable to 6% of the Group's suppliers and 5% of total procurement expenditure. It is worth noting that only 2% of high geographic risk

---

<sup>1</sup> The Group has procured from in FY24

<sup>2</sup> Identified countries were mapped against the Global Slavery Index 2023 with specific consideration to modern slavery prevalence, Government activity and overall ranking for modern slavery vulnerability.

procurement spend is with suppliers that are not required to assess their modern slavery risk under the Modern Slavery Act (2018).

### Industry risks

Within Timberlink’s operations there are two industry sectors that the company engages with that may have inherent modern slavery risks present:

- Corporate services (marketing, cleaning, and travel); and
- Building services (security and maintenance, asset, and tenant management)

The identified risk industries can potentially demand low skilled workers and inexpensive labour, leaving individuals vulnerable to underpayment, withholding of wages and excessive work hours. As most of the Group's operations are focussed on Australia, Timberlink considers these risks to be relatively low. Nonetheless, expenditure in these industries account for approximately 2.5% of total FY24 procurement spend with approximately 57% of spend supported by a due diligence questionnaire. Nearly all these suppliers (by procurement spend) operate wholly in Australia and/or New Zealand reinforcing the relatively low risk in this area.

### Product risks

Certain products within Timberlink’s supply chain present a higher risk of the Group being linked to modern slavery. These products include:

- Maintenance/spare parts,
- Chemicals,
- Uniforms; and
- Technology.

These products present a higher modern slavery risk as they are sometimes produced by low skilled employees that may be subject to sub optimal working conditions. While the Group has long standing relationships with many suppliers of these products, this area poses the greatest difficulty in assessing modern slavery risk with such risks in most cases embedded beyond the first tier of suppliers’ supply chain. Notwithstanding this, Timberlink’s due diligence questionnaire seeks to explore the level of controls its suppliers have in place, such as policy development, supplier due diligence program and audit regime. 33% of these suppliers returned a modern slavery due diligence questionnaire accounting for approximately 62% of total expenditure for these products and services.

## Addressing Risk of Modern Slavery

The Group recognised and accepted that any risk exposure to Modern Slavery would fundamentally reside in Timberlink Australia’s supply chain with much of the risk exposure in Timberlink New Zealand near eliminated with the change of operations from manufacturing to sales and distribution.

The outcomes of the Modern Slavery program outlined within the FY23 statement are as follows:

Item	Status	Outcome
Rollout of the due diligence questionnaire to existing high risk suppliers who have not yet completed the questionnaire,	Continuing	This is an ongoing requirement to drive due diligence review of existing suppliers. Nearly 100% of new suppliers undertake a Modern Slavery due diligence questionnaire as part of the supplier onboarding

Item	Status	Outcome
		process. The rollout to existing suppliers continues on an ongoing basis.
Commence implementation of the audit program for high-risk suppliers,	Complete	Three supplier audits completed over the reporting period. The 3 audits were in response to geographical risks (1 supplier) and Industry risks (2 suppliers).
Develop a preferred supplier program for identified high risk industries and/or products,	Continuing	Ongoing activity is underway to rationalise the number of suppliers by procurement category and incorporate progressively the suppliers that fall into the risk categories (product, industry or geography) identified in this Statement.
Explore potential system developments to improve tracking and reporting of Modern Slavery risks.	Complete	Potential system development opportunities have been identified for the tracking and monitoring of Modern Slavery risk. Further scoping activity required to understand time and resource commitment to implement.

## Assessing the Effectiveness of Modern Slavery Program

Timberlink will continually review and improve its modern slavery procedures to improve the effectiveness of its Modern Slavery Program. The Governance & Risk and Supply Chain departments have met regularly during the reporting period to assess the progress of the Modern Slavery program with progress detailed via reporting mechanisms to the Executive Lead Team and Board. It is expected that the governance of the program will be reviewed in FY25.

Timberlink recognises that the success of its actions to identify and address modern slavery risks in its supply chain is based on a continuous improvement regime supported by annual goals. For the FY25 reporting period, Timberlink will continue to assess its actions against the following key performance indicators:

- Response rate of due diligence questionnaire to targeted existing suppliers.
- Completion of the FY25 Modern Slavery program.
- Biannual review of the Modern Slavery program with the Executive Team; and
- Board updates on the progress of the Modern Slavery program as appropriate.

## Timberlink Group Joint Consultation

During the reporting period, Timberlink Australia and Timberlink New Zealand actively engaged and consulted in the development of this statement. Timberlink discussed details of the Act's reporting requirements and reached an agreement on both the Modern Slavery program and the Modern Slavery statement for the Group.

## FY25 Modern Slavery Program

A number of steps will be undertaken in FY25 to support Timberlink's Modern Slavery program.

These steps include:

- Rollout of the due diligence questionnaire to existing high risk suppliers who have not yet completed the questionnaire,
- Conduct a desktop audit for 3 high-risk suppliers,
- Identify and implement actions associated with the outcomes of the supplier audit conducted in FY24,
- Review Governance program and reporting mechanism to the Executive Team and Board
- Advance the preferred supplier program for select high risk industries and/or products, and
- Scope improvement opportunities to further systemise the tracking and reporting of Modern Slavery risks.

This statement was approved by the Board of Timberlink Australia Pty Ltd as the principal governing body of Timberlink Australia Pty Ltd on its own behalf and as the parent entity of Timberlink New Zealand on 25 September 2024.

This statement was signed by Paul O'Keefe in his role as Director and Chief Executive Officer of Timberlink Australia Pty Ltd and Timberlink New Zealand Ltd on 25<sup>th</sup> September, 2024:

Signature



Name

Paul O'Keefe

Title

Director/Chief Executive Officer

**Timberlink Australia Pty Ltd**

Level 2, 37 Dalmore Drive,  
Scoresby, VIC, 3179  
ABN 12 161 713 015