

Modern Slavery Statement 2023-2024

Published December 2024



INTRODUCTION

In accordance with the requirements of the *Modern* Slavery Act 2018 (Cth) (Act), this statement sets out the actions taken by Hancock Queensland Plantations Pty Ltd ABN 30 142 129 342 (Hancock Queensland Plantations) and its wholly owned subsidiary HQPlantations Pty Ltd ABN 25 142 448 977 (HQPlantations) for the financial year ended 30 June 2024, to identify, address and minimise the risk of modern slavery in its business and supply chain.

REPORTING ENTITIES AND ORGANISATIONAL **STRUCTURE**

Hancock Queensland Plantations

Hancock Queensland Plantations is a holding company (i.e. it does not operate any 'business' itself) which owns all of the shares in HQPlantations only. Hancock Queensland Plantations shares are owned by a number of financial institutional investors and overseas pension funds based in the UK, Denmark and the USA.

Hancock Queensland Plantations does not employ any persons, nor does it produce or procure goods, however it maintains banking facilities which are administered by HQPlantations. As a result, Hancock Queensland Plantations does not itself have any modern slavery matters upon which to report.

Hancock Queensland Plantations registered office is located at Tower 4, Level 12, 18-38 Siddeley Street, World Trade Centre, VIC 3005.

HQPlantations

HQPlantations is a proprietary company with no subsidiaries

Its registered office is located at Lake Vista Office Park, Unit 3A 2-4 Flinders Parade North Lakes QLD 4509.

OPERATIONS AND SUPPLY CHAINS

HQPlantations business is that of a plantation owner and manager, which involves the growing, maintaining, protecting and harvesting of approximately 197,000 hectares of softwood and hardwood plantations across Queensland, and the sale of timber products harvested from the softwood plantations to primarily domestic customers in Queensland and internationally as required. HQPlantations also undertakes fire protection activities, including prescribed burns and wildfire suppression, and associated land management activities.

HQPlantations has approximately 150 employees located across Queensland from the New South Wales border to the Atherton Tablelands in north Queensland. Seedlings are sourced from HQPlantations nursery in the Toolara State Forest.

The majority of HQPlantations operational workforce is contractor based. HQPlantations engages contractors to undertake nursery work, silvicultural work (e.g. planting, fertilising, spraying and pruning), road work, harvesting and haulage. Contractors also assist in fire protection activities, involving prescribed burns, fire tower observation and wildfire suppression. The contractor workforce varies throughout any given year, however, this currently totals approximately 800 persons.

Other supply chains include suppliers of chemicals. fertilisers, personal protection equipment, IT infrastructure and support, consultants and professional services, and fleet management.

Export timber sales involve HQPlantations engaging suppliers at the Port of Brisbane and freight arrangements for delivery of logs to export customers.

RISKS OF MODERN SLAVERY IN OPERATIONS AND SUPPLY CHAINS

The risk of modern slavery in HQPlantations operations is low, given they are conducted in Queensland. HQPlantations actively manages its contractor workforce involved in plantation operations and its activities are subject to independent third party review as part of its internationally recognised Sustainable Forest Management certifications, which HQPlantations is required to maintain. Nevertheless HQPlantations acknowledges that the use of low skilled and transient contractor labour is a modern slavery risk.

HQPlantations also sees the potential for risk in supply chains which involve the supply of goods or services from overseas countries, for example clothing and IT services.

ACTIONS TAKEN TO ASSESS AND ADDRESS THOSE RISKS

The risk of modern slavery in HQPlantations is addressed and assessed through:

- Providing training to HQPlantations staff on modern slavery;
- Maintaining detailed standards on how contractors are engaged and their compliance with legislation;
- Incorporating modern slavery provisions in supplier contract terms;
- When contractors are engaged, payment of wages and conditions of employment are assessed to ensure compliance with the Fair Work Act 2009 (Cth) and the respective Modern Award;
- Every 2 years HQPlantations conducts internal audits of contractors to ensure workers are paid in accordance with Australian employment laws;

- HQPlantations conducts workshops with contractors on human resource and employment practice related matters 2 times per year; and
- Annual independent third party auditor review of HQPlantations business activities as part of its internationally recognised Sustainable Forest Management certifications.

ASSESSING THE EFFECTIVENESS OF SUCH ACTIONS

The current and continuing actions outlined above provide reasonable assurance that contractor workers are paid according to their entitlements.

CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

The directors of Hancock Queensland Plantations are also directors of HQPlantations. Key areas of HQPlantations business were consulted in preparing this statement, including Legal, Human Resources, Stewardship and Commercial Services groups. The Executive Leadership Team of HQPlantations also reviewed this statement.

OTHER RELEVANT INFORMATION

HQPlantations will continue to develop and strengthen its response to modern slavery over time. This will include:

- engaging iPRO, a supplier of modern slavery risk assessment software services, to assist in developing a campaign to assess the modern slavery risk of HQPlantations major suppliers and contractors;
- completing iPRO's survey for a self-assessment, to benchmark HQPlantations compliance, prior to it inviting its contractors and suppliers into this process;
- reviewing HQPlantations Modern Slavery Policy to strengthen and enhance its commitment to promoting ethical labour practices, upholding human rights and ensuring the wellbeing of all individuals, and to ensure that HQPlantations is leading the way for the rest of its supply chain;
- updating HQPlantations' Human Resource Management System with respect to assessing employment requirements of contractors; and
- continuing to integrate and refine the modern slavery provisions in its contract terms.

The iPRO campaign will assess the 'inherent risk' based on the region and industry HQPlantations suppliers operate in and the 'unmitigated risk' that remains present after accounting for modern slavery risk controls that have been implemented. The results of this campaign will be analysed and used as a benchmark to work with HQPlantations suppliers to improve the identification and management of modern slavery risks within their operations and supply chains.

APPROVAL OF THIS STATEMENT

This statement is submitted on behalf of Hancock Queensland Plantations Pty Ltd and HQPlantations Pty Ltd, pursuant to section 14 of the *Modern Slavery Act 2018* (Cth). This Statement was prepared in consultation with, and approved by, the Board of Directors of both entities on 4 December 2024.