Visy Pulp and Paper DDS Process Summary 2026-2027

Doc ID: HOWTO-VFP-OE-FSC-18 Version: 3.0 Published: 19 March 2026

1 Intent

To obtain comprehensive information regarding the origin of fibre sourced for Visy Tumut operations and asses the complexity of the supply chain.

Risk and Mitigation is documented and aligned with ***Requirements for Sourcing FSC® Controlled Wood (FSC- STD-40-005 version 3-1)***, ***Chain of Custody of Forest and Tree Based Products – Requirements (PEFC ST 2002:2020)*** and application of a Due Diligence System (DDS) for compliance with the ***Illegal Logging Prohibition Act 2012 (Cth)***. The Risk Assessment and Risk Mitigation strategy for FSC and PEFC is outlined in the Visy FSC Controlled Wood Risk Assessment and Mitigation Plan and in the PEFC Fibre Supplier Risk Assessment respectively, both available on Visy's website here. Visy's Illegal Logging Due Diligence Procedure - raw logs is used to ensure the specific requirements of Australia's illegal logging legislation are met and documented.

2 Why

To implement a system for verification of the origin of wood or forest products procured directly from forestry operations, or supplied by primary processors in the form of wood residues.

To gain an understanding of the complexity of the supply chain and ensure Visy has sufficient information to assess the risk of sourcing from unacceptable sources.

3 How

1. The Visy Program Manager – Fibre Stewardship and Visy Fibre & Forestry Manager will review all current and proposed suppliers and existing supply agreements.
2. The review will be conducted at least annually and whenever changes occur that affect the relevance, effectiveness or adequacy of the DDS.
3. Visy Representatives will obtain general relevant information regarding the supply of fibre to Visy Tumut upon new supply and change to existing supply.
4. Continual and more specific supplier information will be obtained throughout the term of the supply agreement.
5. Information will be checked against existing parameters to ensure its accuracy.
6. Information regarding sub-suppliers will be obtained.
7. Information will be recorded, saved and reviewed annually as a minimum.
8. Information will be used to conduct a risk assessment on the origin and supply chain for each of the suppliers in the supply chain including sales of controlled material.
9. Where the risk of sourcing from illegal, controversial or unacceptable sources can not be determined as negligible, Visy will implement mitigation measures and/or refuse to accept supply.

Supplier Information

During 2026 - 2027, Visy plans to source pulplogs and sawmill residue from suppliers within Australia. Districts of supply include; New South Wales, Victoria, South Australia and the Australian Capital Territory.

1. Review of Existing Supply Agreements

Visy has existing supply agreements with Standard Intensity and Risk (SIR) suppliers of pulplogs or sawmill chips. These supply agreements contain information that is integral to Visy's DDS. The Visy Fibre & Forestry Manager annually reviews supply agreements and validates the following:

1. Supply of the negotiated volumes is commercially viable in the supply zone stated
2. The species being supplied is available in commercial volumes in the supply area stated
3. The harvest and haulage arrangements are consistent with the stated supply zone and estimated volumes.

This information can be verified a number of ways including utilising existing industry or historical data, or conducting a site visit to the relevant supply locations. The Visy Program Manager – Fibre Stewardship and Visy Fibre & Forestry Manager will use discretion in determining method for verifying this information.

2. Review of small or low intensity managed forests (SLIMF) supply

Visy may agree to purchase pulplogs from small or low intensity suppliers, including one-off supply. This supply may be managed by one-off agreement on volume, species and viability. This agreement includes:

1. Review of all harvest plans
2. Harvest and haulage arrangements
3. Confirmation of commercial viability

This information is verified by utilizing existing industry or historical data, or by conducting a site visit to the relevant supply location. The Visy Program Manager – Fibre Stewardship and Visy Fibre & Forestry Manager will use discretion in determining the method for verifying this information.

3. Obtain Relevant Information – Initial

Visy currently obtains information on the supply of pulplogs at various times throughout the sourcing arrangement. Information is gathered during the supply agreement negotiation stage, from harvest plans for specific sourcing, and upon review of these agreements annually. The following information is obtained from each supplier:

1. Supplier name, ABN and/or ACN number, address and contact information
2. Geographical sourcing area, known as the supply zone.
3. Type of material (pulplogs, sawmill chips etc)
4. Species of material to be supplied
5. Approximate volumes and supply periods
6. Details of Haulage and Harvesting arrangements.

4. Obtain Relevant Information – Continual

Ongoing information is obtained throughout the supply agreement through the harvest plans and delivery and invoice documentation. This information assists Visy to conduct ongoing verification of the origin and supply chain. Additional information obtained includes:

1. Exact geographic location and size of harvest area
2. Forest name and compartment numbers
3. Age class for the relevant compartments for harvest (if available)
4. Date and time of delivery
5. Harvest and haulage contractor details
6. Tonnage supplied per delivery and more general approximations per compartment

5. Validating the Information

Visy's Fibre & Forestry Manager has existing processes for ensuring the supply of fibre to Visy Tumut is consistent with established supply agreements. It is in Visy's commercial interest to ensure supply is reconciled against supply agreements.

6. Sub-supplier Details

Visy sources and trades in by-products/co-products (chip) from sawmill suppliers that have been supplied wood fibre from sub-suppliers. Generally, these sawmills have the same sawlog suppliers as those that supply to Visy. Visy undertakes periodic reviews of the sawmill supplier list and conducts an annual on-site audit of the sawmills.

Where Visy is notified of additional suppliers of sawlog to the sawmill supplying Visy, a review of sawmill due diligence for those suppliers is performed. Additional verification may occur if required, at the discretion of the Visy Fibre & Forestry Manager

7. Record Keeping and Review

All supplier information is recorded by the Visy Fibre & Forestry Manager using the VPP Supply Details spreadsheet and maintained in the Visy Weighbridge Manager system. Supplier and fibre supply records are active records and are maintained regularly.

All supply agreements are reviewed by the Visy Fibre & Forestry Manager with the Supplier regularly.

All information on suppliers, supply agreements and supporting delivery and invoice documentation is maintained by Visy for a minimum of seven (7) years. This information is available to relevant government authorities for the determination of timber legality, as well as Visy's Certifying Body for FSC and PEFC certification requirements.

8. Risk Assessment of Supply

Visy will conduct a risk assessment of its wood fibre upon inception, change in the supply origin or complexity of the supply chain, or annually as part of the internal DDS management system review. This process is documented in the Visy FSC Controlled Wood Risk Assessment and Mitigation Plan, the PEFC Fibre Supplier Risk Assessment and the Illegal Logging Due Diligence Procedure - raw logs.

Contact Information

If you have any concerns or questions regarding this summary of Visy's Due Diligence System, please contact Visy's Representative:

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9. Document Revision History

REVISION	DATE OF CHANGE	PERSON MAKING CHANGE	DETAIL OF CHANGES MADE
1	11 Feb 2025	Rebecca Jones	-Updated for 2025 – 2026 -Migrated to DMS template -As part of upload to VFP DMS the document number changed from PROC-VPP-FSC-004-2
2	19 Mar 2026	Rebecca Jones	-Updated for 2026-2027 -Updated risk terminology from "low" to negligible for sourcing from unacceptable sources -Updated formatting and hyperlinks
3	16 Oct 2026	Rebecca Jones	Explicitly included Illegal Logging Due Diligence Procedure. Minor grammar and formatting changes.