



Health, Safety and Environmental Policy

The Directors and Officers of Summit Forest New Zealand (NZ) Ltd (SFNZ) are committed to ensuring a responsible Health, Safety and Environmental working culture as an integral part of its business. It is our policy to ensure that our forest estate and operations are, at all times and in all places, fully compliant with all health, safety and environmental legislation and obligations by adhering to the following principles:

- Demonstrating a visible commitment to health and safety.
- Having systems in place to encourage worker engagement in health and safety.
- Identifying, managing and mitigating significant hazards.
- Implementing and monitoring hazard management plans for the work environment.
- Having robust, proactive and accurate health and safety reporting.
- Ensuring that all workers receive relevant health and safety training.
- Ensuring that all workers and visitors are made aware of hazards both real and potential so they can look after themselves and keep others safe while at work or visiting SFNZ premises.
- Ensuring that the safety of our workers is not compromised by anyone under the influence of drugs, alcohol or fatigue.
- Actively promoting the health, safety and wellbeing of our workers.

Summary

Compliance	Compliance with all relevant international, national and local statutory requirements and industry best-practice standards.
Leadership	Development of a safety leadership programme.
Engagement	Our workers will be actively encouraged to participate in our health and safety management.
Risk Management	Regular reviews of our workplace for real and potential risks and take steps to identify harm and risks, and assess, control, monitor and review risks.
Working with Other PCBU's	We will identify, consult, co-operate and co-ordinate with all PCBU's (Person Conducting a Business or Undertaking).
Contract Management	We will ensure all contractors complete and maintain a plan for working on premises.
Prevention	Worker and SFNZ obligations are set out, including measures to avoid and/or minimise any negative impact in the communities and environment.
Continuous Improvement	We will manage and monitor corporate, managerial, and employee obligations.
Communication	We will promote positive culture within the workplace and open consultation.
Reporting	We will ensure systems are in place for the accurate reporting and recording of all incidents, accidents, near misses and hazards.
Induction	All new workers will receive basic health and safety training prior to starting work.
Impairment	We will ensure the safety of our people is not compromised by anyone under the influence of drugs, alcohol or fatigue.
Health and Well-being	We will actively promote injury management and the health and wellness of workers.

Signed

T. Ogawa

Dated

19.4.2018

Tetsuro Ogawa, Managing Director



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Compliance

We will comply with all relevant international, national and local statutory requirements and industry best-practice standards, including but not limited to:

- Health and Safety at Work Act 2015 (HSWA)
- Health and Safety at Work (Hazardous Substances) Regulations 2017 (work risks)
- Hazardous Substances and New Organisms Act 1996 as amended (non-work, public health and environmental risks)
- Approved Code of Practice (ACOP) for Safety and Health in Forest Operations
- The Forest Stewardship Council certification requirements
- Northland Regional Air Quality Plan and Northland Regional Soil and Water Plan
- Fire and Emergency New Zealand Act 2017 (FENZ)
- National Environmental Standards for Plantation Forestry dated 1 May 2018

Summit Forest (NZ) Ltd will implement procedures to ensure compliance. Compliance will be a key focus in the training and performance of all employees, contractors and suppliers.

To achieve our vision of a safe working environment we are committed to take the following action:

Leadership

We will develop a safety leadership programme that includes:

- Measurable undertakings by directors and managers.
- Documented expectations of safety behaviours at all levels of the organisation.

Engagement

Our workers will be actively encouraged to participate in our health and safety management including:

- Involvement in hazard identification, assessment and management.
- Having a designated health and safety representative and or participating in health and safety



committees.

- Developing an environment for ensuring regular and cooperative interaction between employers and workers on health and safety matters.

Risk Management

We will have a process in place for regularly reviewing our workplace for real and potential risks and take steps to:

- Identify what causes harm and how that harm may occur
- Identify the risk associated with that harm
- Assess the risk using a risk assessment table
- Control the risk
- Document our controls
- Monitor and review our risk management.

We will educate our workers on the most critical risks they face at work to prevent harm as a result of this risk.

Risk Register Review

All risks will be recorded in our Health and Safety Management system known as Mango. Mango will notify key personnel when the annual review of the register is due. We will review any changes in legislation and/or work processes that have a bearing on the health and safety of workers to ensure that procedures can be updated or training arranged. Workers will be able to regularly review the hazard register as part of regular staff meetings.

Controlling Risk

We are committed to ensuring that risk is managed. We will consider all activities to ensure that risk is reported, controlled or eliminated. The following are activities to manage risk within the company's operations:

- Annual reviews of systems / operations and contractor performance
- Management plan reviews
- Auditing
- Improvements
- Hazard Identification, Risk Management and Mitigation
- Social Impact Assessments
- Proactive Stakeholder Engagement



- Protecting the forest from illegal activities
- Policy changes to reflect new legislation or identified risks
- New forest operations

We will undertake a six step method to control identified risks:

1. Eliminate the hazard - if possible we will remove the hazard from our workplace. If this is not practicable we will
2. Substitute - if possible we will use a safer alternative. If this is not practicable we will
3. Isolate - we will investigate to see if we can isolate people from the hazard. If this is not practicable we will
4. Create engineering controls - if possible we will adapt tools or equipment to eliminate the hazard. If this is not practicable we will
5. Create administrative controls - if possible we will increase supervision or monitoring, or training. If this is not practicable we will
6. Provide equipment- we will investigate to see if we can protect our workers through equipment such as personal protective clothing or improve operator skills.

Working with Other PCBU's

When working with other PCBU's we will take all practicable steps to:

- Identify all other duty holders;
- Consult with them on all matters of health and safety;
- Co-operate with them to ensure all risks are identified, assessed and controlled;
- Co-ordinate all health and safety activities.

Contract Management

We will ensure all contractors complete and maintain a plan for working on premises with the following content:

- A copy of their safety management plan.
- A current training and competency register if relevant.
- Job Safety Analysis/Task Analysis.
- Permits to work if relevant.
- Evidence of an emergency management plan.
- Annually review contractor HSE performance



Prevention

All workers are expected to take responsibility to employ management systems and standard operating procedures specifically designed to avoid activities and/or minimise conditions that pose a risk to themselves and others, or environment or the workplace. We will assign management responsibilities and appropriate resourcing for Health Safety and Environment (HSE) management and initiatives for the company.

Active measures will be taken to ensure we avoid and/or minimise any negative impact in the communities and environment in which we operate. We will be prepared and responsive in the case of emergencies which pose a threat to human safety and to confidently mitigate any adverse environmental effects.

Continuous Improvement

We will continuously seek opportunities to improve the health, safety and environmental performance of our company by regularly reviewing and evaluating our policies / procedures and managers' performance; and by setting key objectives and targets that are measurable. All employees will understand and follow the HSE management system and Forest Management Plan, which will identify the specific actions required to meet agreed objectives and targets.

We will:

- conduct self-assessments to ensure we continue to meet the performance criteria set down by FSC and Forest Management Plan processes;
- review the HSE system annually or following a critical event to ensure the systems are effective and are being continually improved and whether the systems are achieving set objects. As part of the annual review objectives will be set for the next 12 months;
- Monitor any necessary plant, equipment or environmental impact.

Communication

We will communicate a positive culture within the workplace for health, safety and environmental commitment and performance to our employees, contractors, customers and stakeholders.

We will openly consult with any employee representatives, unions or stakeholders who are nominated in managing workplace HSE.

Reporting

All workplace injuries and incidents are to be reported, recorded and appropriately investigated. We will have systems for the accurate reporting and recording of all incidents, accidents, near misses and hazards.

We will measure and report on:

- hazards, audits and hazard register management,
- incidents, near misses, and occupational illness,
- trends including routine exposure to risks that are potentially harmful, including bullying,



- progress on implementation of improvement plans,
- actions in place for preventing harm, including training,
- absence rates due to sickness,
- the health and safety performance of contractors, and
- progress against monthly targets.

Induction

All new workers will receive basic health and safety training prior to starting work. Basic training will include the following content:

- Health and safety policy,
- Hazard identification and management,
- Reporting of any medical conditions that may impact on his or her own safety or the safety of others,
- Emergency plan and first aid facilities,
- Visitor and contractor management, and
- Encouraging worker participation and consultation.

Impairment

We will ensure the safety of our employees is not compromised by anyone under the influence of drugs, alcohol or fatigue. The drug and alcohol policy will include:

- A commitment to work with workers or their representatives to promote a work environment free from drugs and alcohol.
- A programme for workers post-incident, and reasonable cause drug and alcohol testing through a reputable company, occupational nurse or medical professional (testing to comply with Australian/New Zealand standard AS/NZS 4308:2008).
- Provision to remove anyone from the work site who is deemed 'unfit for work' or 'under the influence', or where the presence of drugs or alcohol is in excess of accepted standards (in order to comply with the legal duties under the Health and Safety at Work Act 2015).
- Provision of drug and alcohol support and rehabilitation assistance for workers where appropriate.

The fatigue management plan will:

- Recognise fatigue as a possible hazard.
- Identify possible work design risks (long hours, stress etc.) that may cause fatigue.



- Identify where fatigue related impairment may cause safety risks (e.g. driving).
- Ensure appropriate counselling services are available for staff.

Health and Wellbeing

We will actively promote injury management and the health and wellness of workers. This will include:

- Education and information about health risks associated with work tasks and activity.
- Education and operational procedures on injury management (roles and responsibilities).
- Monitoring for known significant hazards, such as Occupational Overuse Syndrome (OOS).
- Provision of an employees' assistance programme, where appropriate.

This policy was written in April 2016, and reviewed in April 2018.

It will be reviewed again in April 2020.

Signed T. Ogawa Dated 19. 4. 2018
Tetsuro Ogawa, Managing Director

