

STAKEHOLDER ENGAGEMENT POLICY AND PROCEDURES



Purpose and scope

Australian Bluegum Plantations (ABP) acknowledges that forest management decisions and operations have the potential to affect a wide range of individuals, businesses and organisations, including Indigenous peoples, interest groups and neighbours.

This policy provides the framework with which ABP will plan and implement stakeholder engagement. The vision of ABP is for stakeholders to have the opportunity to engage in a manner that allows stakeholders needs and interests to be consistently, transparently and meaningfully considered in ABP's forest management processes and activities.

The ABP Stakeholder Engagement Policy and Procedures has the overall goal of effectively communicating and actively engaging community members, including members of the public, stakeholders and indigenous people to develop strong positive relationships and mutual understanding of economic, social and environmental values.

To achieve this goal, ABP has set the following objectives:

- To communicate effectively and engage with stakeholders
- To facilitate our ability to understand stakeholder concerns and interests and incorporate them into decision-making processes
- To increase the transparency of our forest management processes and activities
- To build the trust and respect of our stakeholders.
- To build stakeholder confidence in ABP and our forest management processes to strengthen our corporate reputation within the communities in which we operate.

The Stakeholder Engagement Policy and Procedures provides a guideline for establishing and maintaining good relationships with stakeholders throughout the course of ABP's normal business activities, including, but not limited to: forest management planning, operational planning, plantation harvesting and haulage operations, plantation establishment operations and emergency situations

Policy

ABP is committed to developing effective working relationships with relevant stakeholders and will make every reasonable effort to work with stakeholders to resolve issues that occur while carrying out the management of the ABP estate.

ABP will advise stakeholders of relevant forest operations in accordance with all relevant legislation and corporate policy. ABP will provide opportunity for stakeholders to provide input into forest management

Stakeholders who engage with ABP will be advised of how their views may be considered in decision-making processes and which aspects of forest operations and planning can be influenced by stakeholder input.

ABP will use a variety of methods to engage stakeholders recognising that tools and strategies must be tailored to suit the decisions, activities and processes we are seeking to engage on.

ABP is committed to:

- Being open and honest with stakeholders
- Providing accurate and timely information to stakeholders
- Listening to and responding to stakeholder views and concerns
- Evaluating the effectiveness of ABP stakeholder engagement activities and working to continually improve engagement performance.

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Related documents

CF-2003 Incident Report Form
MP-2058 ABP Natural Values Management
(Regional) Stakeholder Register (SinglePort/Forestry/HSEC/Registers)
ABP Risk Register (SinglePort/Forestry/HSEC/Registers)
Legal Compliance Register (SinglePort/Forestry/HSEC/Registers)
Evaluation and Mapping Procedure

Definitions and terms

Stakeholder	<p>Stakeholder is an individual and/or group who is affected by ABP operations, have an interest in ABP operations, or can influence ABP operations.</p> <p>Stakeholders may include, but are not limited to:</p> <p><u>Registered Indigenous Parties:</u></p> <p>ABP recognises that Indigenous People with legal or custodial tenure, and/or with an interest in known sites of cultural significance, are a unique group with a variety of interests and cultural values when compared to other stakeholders. However for the purpose of this policy and procedures, they are included in the definition of stakeholder.</p> <p><u>Plantation neighbours and other community members:</u></p> <ul style="list-style-type: none">• Plantation neighbours, including those property owners and/or residents adjacent to forest operations and those within close proximity to forest operations who may be affected by operations (e.g. noise, dust, truck movements).• Lessors <p><u>Interest groups and representative bodies:</u></p> <ul style="list-style-type: none">• Groups or organisations potentially impacted by or interested in ABP forest operations. May include environmental groups, land stewardship organisations (e.g. Landcare, Greening Australia), local schools, sporting organisations or general community groups.• Industry-based representative organisations (e.g. NFF, VAFI, AFPA, FIFWA) <p><u>Government and other regulatory agencies:</u></p> <ul style="list-style-type: none">• Includes national, state and local government agencies and representatives (e.g. local government, state land management agencies (DEPI, DEPAW), catchment management authorities).• Emergency Services (e.g. Police, Fire, Ambulance, SES)• Utility companies (e.g. Phone, power and gas companies)• Regulators (e.g. DEPI, DEPAW, Workplace Safety, APVMA, AQIS)• Forest certification bodies and auditors <p><u>Corporate interests:</u></p> <ul style="list-style-type: none">• ABP staff, contractors and suppliers• ABP customers• GFP and investors
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	<ul style="list-style-type: none">• Forest industry businesses (e.g. other companies operating within the region and/or with similar interests)• Media
Stakeholder Engagement	Stakeholder engagement utilises a range of communication methods to enable decision-makers and stakeholders to have an opportunity to share concerns and knowledge, and to develop mutually acceptable outcomes.
Forest management	Forest management concerns the overall management of forests, including administrative, economic, legal, social and technical aspects such as strategic and operational forest planning, silvicultural operations (e.g. plantation establishment, research and development) and extractive operations (e.g. harvest and haulage).

Procedure

ABP stakeholder engagement processes are guided by three engagement principles which provide a basis for acceptable standards and good practice of stakeholder engagement:

Principle 1 – Inclusivity

ABP will engage with a broad range of stakeholders potentially affected by, or interested in, forest management processes and activities, and provide them with the opportunities and information they need to participate in a meaningful way.

Principle 2 – Transparency

ABP will act openly and honestly with stakeholders in the engagement process, and subsequent decision-making processes.

Principle 3 – Emphasis on mutual learning and relationship development

ABP will create opportunities for stakeholder engagement that emphasises mutual learning outcomes and the development of relationships. Engagement approaches will welcome the sharing of diverse knowledges and values without prejudice or judgement.

Legal obligations

In implementing this Stakeholder Engagement Procedure ABP must comply with all applicable laws, regulations and corporate commitments (eg. forest certification) on stakeholder engagement and community consultation as listed in the ABP Legal Compliance Register.

Stakeholder identification and engagement

In pursuing stakeholder engagement best practice, ABP will:

- Develop a Stakeholder Register to record relevant stakeholder information, including contact details, details of interactions including concerns and management actions taken to address concerns. Stakeholder contact information will only be recorded with permission and used in accordance with the all relevant State and Federal regulations (e.g. Privacy Act).
- Identify neighbours adjacent to operations, and other residents within close proximity of operations who may be impacted (including sensitive neighbours such as vineyards, organic farms, or fish/marron farms), advise them of operations and address concerns prior to operations commencing.
- Notify responsible authorities and lodge requisite documentation with the relevant authorities prior to operations commencing.
- Maintain communication with directly affected stakeholders throughout the duration of relevant forest operations where required.
- Respond to stakeholder questions and enquiries in a timely manner.

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- Documenting the views and concerns of stakeholders in the Stakeholder Register to provide a systematic understanding of the nature of the social impacts of ABP forest management activities, and to identify sensitive issues in advance. Social impact studies may also be used to gauge impacts.
- Seek to engage with special interest groups with a relevant interest in ABP forest management and operations (e.g. wildlife carers, Land care organisations).
- Engage stakeholders, in the development of the Plantation Management Plan and related documents. The level of engagement sought will depend on the scale and intensity of planned operations.
- Demonstrate how stakeholder concerns and input have been considered in decision-making using a method commensurate with the level of input and the scale of operations (e.g. verbal response, formal letter, summary report).
- Actively participate in relevant advisory groups and strategic partnerships to achieve mutual goals and/or develop strategies when considered important for ABP operations or the forest industry

Indigenous and Cultural Heritage

In order to protect and maintain Indigenous and Cultural Heritage, ABP will:

- Undertake Indigenous and cultural heritage land searches in accordance with the ABP Natural Values Management (MP-2058) and Evaluation and Mapping Procedure (OP-7006) procedures.
- Work with Registered Indigenous Parties and applicable Indigenous and Cultural Heritage groups to assist in the assessment, protection and management of Indigenous/cultural heritage sites found on ABP managed properties, including the application of Indigenous knowledge where relevant.
- Notify and provide requisite information to the relevant office of state heritage or Indigenous affairs whenever a site of cultural or Indigenous heritage is located.
- Make available relevant information outlining ABP forest management operations and opportunities for stakeholder involvement.
- Seek to attend and participate in relevant forums and meetings in response to Indigenous and cultural heritage sites, or for other purposes upon request.

Stakeholder Engagement Methods

ABP recognises that different levels of stakeholder engagement are appropriate depending on the engagement objectives, relevant regulatory requirements, timeframes, resources and the concerns or issues being considered (see associated document ABP Engagement Spectrum for potentially suitable techniques).

Monitoring and evaluation of social impacts

In order to monitor and evaluate social impacts, ABP will:

- Review and assess all information received from stakeholders pertaining to real or perceived social impacts and add to the ABP Risk Register.
- In accordance to the scale and intensity of operations, actively engage with stakeholders to identify and evaluate potential social impacts.
- Use available information sources (e.g. research and consulting reports, ABS online statistics) to assist in the effective evaluation of social impacts.
- Maintain communication and relationships with a range of stakeholders including local councils, relevant government agencies, and various stakeholder groups.
- Attend and/or address relevant events including stakeholder group meetings.

Complaints

ABP will ensure that all grievances or complaints regarding company activities are addressed in a consistent manner with a guarantee of protection from harassment, prosecution or any other form of reprisal or retaliation.

The following grievance process is to be used in the event that a stakeholder is not satisfied with ABP's response, the stakeholder will be notified of this process:

- a) The stakeholder should seek first to resolve their complaint directly with the specific ABP staff member, or his/her direct manager, whose action or decision they challenge.
- b) Stakeholders who are unable to resolve their issue directly should be referred to the Chief Executive Officer (CEO) to lodge their complaint, in writing, within 30 days. The stakeholder should describe the basis for the complaint; identify potential parties involved in the complaint; summarise the proceedings and results to date; and suggest a solution.
- c) The CEO will decide whether the issue can be addressed by him/herself. If not, the CEO will appoint a Dispute Resolution Committee or request that the dispute be heard by the Dispute Settlement Centre (or equivalent body).
- d) This Dispute Resolution committee, will be chaired by the CEO or someone nominated by the CEO. The CEO will appoint two other ABP representatives to the committee and invite external members where appropriate.
- e) The principal tool for resolving the dispute will be written submissions. However, the Dispute Resolution Committee has discretion to conduct face-to-face negotiations and site visits where necessary. Complainants will receive copies of all documents filed regarding the dispute.
- f) ABP will bear the costs of routine communication with parties to the dispute. Additional expenses must be agreed, in advance, in writing, between the parties.
- g) The committee chairman will communicate, in writing, the outcome of the dispute resolution procedure to all parties directly involved within 60 days of receipt of the complaint.

All complaints shall be recorded in the Stakeholder Register. Corrective Actions shall be added to the Stakeholder Register and tracked by HSEC to completion.

Due Diligence Systems (DDS)

With regards to the DDS developed in accordance with FSC Controlled Wood procedures, ABP will undertake the following when handling comments and complaints from stakeholders relating to these systems.

- a) Acknowledge complaints within 24 hours of being received;
- b) Inform stakeholders of the complaints procedure, and provide an initial response to complainants within a time period of two (2) weeks;
- c) Forwarded complaints relating to risk designations in the relevant FSC risk assessment to the responsible body;
- d) Conduct a preliminary assessment to determine whether evidence provided in a complaint is or is not substantial, by assessing the evidence provided against the risk of using material from unacceptable sources;
- e) Dialogue with complainants that aims to solve complaints assessed as substantial before further actions are taken;
- f) Forward substantial complaints to the certification body and relevant FSC National Office for the supply area within two (2) weeks of receipt of the complaint. Information on the steps to be taken by the organization in order to resolve the complaint, as well as how a precautionary approach will be used, shall be included with the complaint;

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- g) Employ a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending;
- h) Conduct a desktop audit to verify a complaint assessed as substantial by the organisation, within two (2) months of its receipt;
- i) Determine the corrective action to be taken by suppliers and the means to enforce its implementation by a supplier if a complaint has been assessed and verified as substantial. If a corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be excluded by the organisation;
- j) Verify whether corrective action has been taken by suppliers and whether it is effective;
- k) Exclude the relevant material and suppliers from the organisation's supply chain if no corrective action is taken;
- l) Inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution, and for maintaining copies of relevant correspondence; and

Record all details about the complaint including any actions taken in the relevant Stakeholder Register. Other evidence will be kept at regional offices.

Media Comment

Staff are to be polite and courteous to all media enquiries, however media comment is restricted to:

- CEO for general comment
- Regional Managers (RM's) to comment on matters within their regions with prior approval of the CEO.

No other staff member is permitted to make comment to the media without the approval of the CEO.

Reviewing this policy and procedure

ABP is committed to continually improving the effectiveness of stakeholder engagement. A key element of this improvement will be evaluating our performance under these Policy and Procedures and, if necessary, amending and adding to this document.

Informal monitoring of the effectiveness of the Policy and Procedures will be ongoing and incorporate feedback from staff and stakeholders. A formal systematic review will be undertaken every three years, or earlier if considered necessary.

Records

Record	Location
WA Stakeholder Register	SinglePort – Forestry/HSEC/Registers
GT Stakeholder Register	SinglePort – Forestry/HSEC/Registers