

CHAIN OF CUSTODY POLICY

Pentarch Forestry (Pentarch) has implemented and maintains a Chain of Custody (CoC) Management System in accordance with the requirements of the following international standards:

- PEFC (Programme for the Endorsement of Forest Certification schemes) PEFC-ST 2002, and
- The FSC® (Forest Stewardship Council) standards including FSC-STD-40-003 (CoC Multi-site Requirements), FSC-STD-40-004 (CoC Certification) and FSC-STD-40-005 (CoC Controlled Wood).

Pentarch is committed to trade only in forest products that are sourced from forests that are either certified to the FSC and/or PEFC standards or from forests that are well-managed and controlled, where ecological, sustainable, social and responsible forest management values are observed. All inputs will undergo a due diligence test to establish legality and the risk of originating from controversial sources.

The multi-site system is centrally administered and is annually assessed for compliance to the standards by accredited third-party auditors. Pentarch ensures continual improvement of the system, its objectives and policies to support changing resource and market demands, modern practices and technological improvements.

The Company publicly commits to the values embodied within the PEFC and FSC Standards and it will not to be directly or indirectly involved with any of the following unacceptable activities:

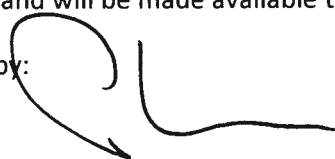
- a) Illegal logging or the trade in illegal wood or forest products;
- b) Violation of traditional rights and human rights in any forestry operations;
- c) Destruction of high conservation values through any forestry operations;
- d) Significant conversion of native forest to plantations or non-forest uses;
- e) Introduction of genetically modified organisms in any forestry operations;
- f) Violation of any of the ILO Core Conventions as defined in the ILO Declaration on fundamental principles and rights at work.

Pentarch will act to promote its social responsibility at business unit level by:

- Recognising the right for personnel to collectively bargain consistent with the ILO conventions;
- promoting equal opportunities and treatment for all employees;
- adhering to the minimum age of employment;
- Implementing an occupational health and safety system that will provide a safe and healthy workplace for all employees.

This commitment has been communicated to all Pentarch Forestry employees, suppliers and customers and will be made available to any interested party upon request.

Approved by:



Paul Heubner
Pentarch Forestry CEO
March 2019



Stephen Allan
General Manager Operations
March 2019