

Contents

1	Introduction.....	2
1.1	Background	2
1.2	Purpose	2
1.3	Scope	2
2	Forest Management Policy	3
3	Legislative Context.....	3
4	Scale, Intensity and Risk	3
5	Management Objectives	3
6	Resource Description	3
6.1	Forest Management Unit.....	3
6.2	Ownership Status and Land Tenure	4
6.3	Profile of adjoining lands	4
6.4	Previous Land Use	4
7	Socio-economic contribution.....	4
8	Stakeholder Engagement	4
9	Indigenous Community Engagement.....	5
10	High Conservation and Environmental Values	5
11	Non-Timber Forest Products.....	6
11.1	Grazing	6
11.2	Apiary.....	6
12	Plantation Silviculture.....	6
12.1	Species	6
12.2	Site Assessment.....	6
12.3	Site Cleanup	6
12.4	Access roads and drainage / Plantation Layout	7
12.5	Cultivation	7
12.6	Fencing	7
12.7	Seedlings	7
12.8	Planting.....	7
12.9	Pest and Weed Control	7
12.10	Coppice.....	8
12.11	Fertiliser Application	8
12.12	Management of Operational Impacts	8
13	Forest Planning	8
13.1	Planning horizons	8
13.2	Growth and yield.....	8
13.3	Harvesting Rates	8
13.4	Mapping	9
14	Plantation Harvesting.....	9
15	Chain of Custody.....	9
16	Plantation management and protection.....	9
16.1	Forest health	9
16.2	Fire Management.....	9
16.3	Illegal Activities	9
17	Health, Safety and ILO	9
18	Monitoring and measuring	10
19	Review	10

Acknowledgement to Country

GPFL acknowledges the traditional owners of the land on which it operates. This is the Gunditj Mirring Traditional Owners Aboriginal Corporation and Eastern Maar Aboriginal Corporation. GPFL acknowledges them as Traditional Owners.

GPFL also pays their respects to Elders, past, present and emerging, and Aboriginal Elders of other communities. GPFL seeks to foster a cooperative relationship with traditional owners in the management of Aboriginal values where they occur on the land it operates.



GPFL MANAGEMENT PLAN

Custodian: Certification Consultant

Authorised by: Director

1 Introduction

1.1 Background

Green Triangle Plantation Forest Company of Australia Pty Ltd (GPFL) is a hardwood timber plantation forestry company operating in the Green Triangle region of South West Victoria since 1997, with the sole purpose of providing the major shareholder with fibre resource in the form of woodchips for paper production.

The GPFL forest management unit (FMU) is 3,775 ha hectares consisting of 2,913 ha of *Eucalyptus globulus* plantation. The FMU encompasses all land and forest in which the company has management control.

GPFL sells the timber resource standing under stumpage agreements in which the fibre is sold back to the GPFL shareholders.

The GPFL office is located in Portland Victoria, with the company directors based out of the shareholder Oji Green Resources office in Melbourne Victoria.

The company has 2 international shareholders, Oji Green Resources Co. Ltd and Toppan Printing Co. Ltd.



1.2 Purpose

The purpose of this Management Plan (MP) is to communicate the management objectives and principles which apply across the GPFL FMU, in conformance with the applicable Forest Stewardship Council® (FSC) Standards. This MP forms an integral part of the systematic management system and should be read in conjunction with a range of other GPFL documents, which can be identified throughout this document via ***bold italics***.

1.3 Scope

The scope of the certification is the freehold properties owned and managed by GPFL for *Eucalyptus globulus* plantations in south-west Victoria. These properties have been under management for at least two rotations. Plantations are established on previously cleared agricultural land and stands of native vegetation are protected from operations.

This Manual has been developed to comply with the following FSC standards:

- FSC-STD-30-010 V3-0 EN Controlled Forest Management
- FSC-STD-50-001 V3-0 EN Use of the FSC® Trademarks by Certificate Holders
- FSC-STD-AUS-01-2018 EN The FSC National Forest Stewardship Standard of Australia (relevant components only)

The relevant normative FSC Directives and Interpretations have also been accounted for where appropriate. The latest versions of the normative framework are accessible via the following website, [Document Centre | Forest Stewardship Council \(fsc.org\)](https://www.fsc.org/Document-Centre/Forest-Stewardship-Council).

Key elements of the scope of this certification are:

Element	Scope
Area	3,818.1 ha (gross); 2,917.8 ha (nett plantation)
Land ownership	Freehold
Employees	One (non-operational on-site)
Operations	Site Preparation, Chemical Application, Establishment, Maintenance, Fire Prevention and Response, Pest Plant and Animal Management, HCV Management and Maintenance, Property Management and Maintenance.
Species	<i>Eucalyptus globulus</i> (Blue Gum)

NB: All printed copies of this document are uncontrolled. Refer to the electronic copy on the Management System for the latest version.

MS:
Created: 22/12/2023
Printed: 27/06/2026

GPFL_Management_Plan_V1.1
Last Update: June 2026
Custodian: Certification Consultant

Version Number: 1.1
Review Date: June 2027
Page 2 of 11



GPFL MANAGEMENT PLAN

Custodian: Certification Consultant

Authorised by: Director

2 Forest Management Policy

GPFL have prepared a **Forest Management Policy** that outlines its high level commitments to the management of its forest estate.

3 Legislative Context

Management of the estate will be in accordance with State and Federal legal requirements. All of GPFL's legal requirements are contained within the **GPFL Legal Register** and are incorporated into the plantation management policies and procedures. The Register is updated annually with any Regulatory amendments incorporated into the GPFL systems.

4 Scale, Intensity and Risk (SIR)

Whilst GPFL do not qualify as a Low SIR, it is still of a relatively small scale by comparison to other plantation management companies. This is justified by the following statistics:

Element	Scope
Employees	1 FTE (administrative on-site)
Plantation Area	2,918ha
Annual Harvest Area	Variable due to age class distribution and area.
Operational Scope	Site Preparation, Chemical Application, Establishment, Maintenance, Fire Prevention and Response, Pest Plant and Animal Management, HCV Management and Maintenance, Property Management and Maintenance. Harvesting and Haulage is NOT managed by GPFL.
Annual Establishment	On average, approximately 150ha (coppice and seedlings)
Risk Profile	Social: Low. Not a large employer or purchaser of goods and services Environmental: Moderate. Primarily driven by chemical application, albeit in low volumes. Cultural: Low. No mapped cultural heritage values on the estate. Economic: Low. Small landholder, small contribution.

5 Management Objectives

GPFL have developed a set of objectives for management. These objectives see to be environmentally sound, socially beneficial and/or economically viable.

Objective	Social	Environmental	Economic
Work co-operatively with other plantation managers on fire prevention and response.	✓	✓	✓
Minimise forest health impacts by damage agents.	✓	✓	✓
Maintain and enhance HCV's on the estate by undertaking proactive threat management control measures.	✓	✓	
Provide a safe workplace for staff, contractors and visitors to the estate.	✓		✓
Ensure no property damage to the public or neighbours or damage to HCV's as a result of operational activities.	✓	✓	✓
Ensure no damage to environmental or cultural values as a result of operational activities.	✓	✓	✓
Ensure no breaches of legislation, legal action or fines/prosecutions.	✓	✓	✓
Provide an economically viable yield of hardwood to shareholders along with a financial return on investment.			✓
Ensure forests are managed to improve productive capacity by implementing appropriate and timely management.			✓
At least 80% of operations to be contracted to local companies within 100km of Portland (in the Green Triangle Region).	✓		✓
At least 80% of supplies to be sourced from Local businesses.	✓		✓
No complaints, disputes or grievances.	✓	✓	✓

6 Resource Description

6.1 Forest Management Unit

GPFL's Plantation estate is located within South West Victoria in the Glenelg Hopkins Catchment Basin. The plantations fall within 3 local government areas - Glenelg, Southern Grampians and Moyne.

NB: All printed copies of this document are uncontrolled. Refer to the electronic copy on the Management System for the latest version.

MS:
Created: 22/12/2023
Printed: 27/06/2026

GPFL_Management_Plan_V1.1
Last Update: June 2026
Custodian: Certification Consultant

Version Number: 1.1
Review Date: June 2027
Page 3 of 11

6.2 Ownership Status and Land Tenure

All of GPFL's properties (except one) are fully and wholly owned by GPFL as freehold title. One property (Smokey Valley) falls into a *Victorian Plantations Corporation Act 1993* licence. This is a perpetual licence issued pursuant to Part 3A of the *Victorian Plantations Corporation Act 1993*. The license gives the licensee exclusive possession of the licensed land and was purchased for a licence fee. Usage of the licensed land is governed by s.27B(1) of the *Victorian Plantations Corporation Act 1993* and relevance to GPFL limits usages to – establishing, maintaining and managing timber plantations.

6.3 Profile of adjoining lands

The land adjacent to the company's estate falls into three categories, rural freehold farmland, other plantation forest, and Crown land consisting mainly of State Forest and Reserves. This is consistent with the rural region of South West Victoria, as all of the land that has been purchased was degraded farmland and with the boom of the forest industry in the 1990's other companies have also established themselves over the rural landscape.

6.4 Previous Land Use

The entire estate was previously used as agricultural farming land or plantation forestry, with the company policy of retaining all native vegetation. Since the establishment of the company no land has been cleared or converted for GPFL plantation.

GPFL established the majority of plantations by seedlings and acquired a proportion as second rotation coppice with a smaller proportion replanted by the company.

7 Socio-economic contribution

GPFL is a relatively small contributor in terms of socio-economic contribution. In comparison to the other plantation growers/owners within the green triangle region, GPFL would be the smallest plantation manager and employer by a long way, with a plantation estate of only 2,918ha.

GPFL engage local businesses and contractors to supply products and provide services to the company both administrative and operational.

Most of these suppliers and service providers have a long-standing relationship with GPFL, many from the very beginning and GPFL support these workers by providing an income and ensure prompt payment of invoices.

The company also has a Forest Industry Brigade (and is a member of the Green Triangle Fire Alliance), in which we provide resources and support to protect landowner's assets, and those of neighbouring properties in the event of a wildfire threat.

GPFL actively manage noxious weeds and protects native vegetation and biodiversity for the benefit of the current and future generations.

GPFL sells the resource standing to local processors, indirectly contributing further to employment in the region, for harvesting and haulage operation.

The company's major shareholder Oji Co Ltd purchases the processed timber under a back to back agreement, and the woodchips are exported through the Port of Portland, further contributing to the Regions economics.

8 Stakeholder Engagement

GPFL communicate and cooperate with stakeholders regarding approvals and coordination of efforts, in a bid to build and retain positive mutual relationships and understanding. Communication/engagement is achieved through many forms such as direct interactions, meetings, phone and email correspondence.

Stakeholders are defined but not limited to:

- Investors, employees, contractors and other providers of services or goods
- Statutory authorities
- Neighbours
- Non-Government Organisations
- Indigenous communities
- Interested parties

GPFL actively engage with stakeholders on:

- Inter-agency liaison for unauthorised and illegal activities such as hunting, poaching, theft, trespass



GPFL MANAGEMENT PLAN

Custodian: Certification Consultant

Authorised by: Director

- Problem animal control such as feral pig management
- Mutual boundary fence construction and maintenance
- Agistment and other alternative land use
- Entry points and waterway crossings
- Fire protection resources and fire response
- Any forest health outbreaks
- Operational activities
- Lessees on lease arrangements
- Identification and management of environmental and high conservation values

GPFL will take responsibility for liaison and consultation with the local community and stakeholders to ensure that a consistent and accurate representation of the company is upheld.

All complaints, disputes and grievances are recorded and will be addressed as per the **GPFL Dispute and Grievance Procedure**.

GPFL will make a range of documents available on their website as required under the applicable FSC certification standard.

9 Indigenous Community Engagement

GPFL will continue to respect and acknowledge the traditional owners of the land, and seek their guidance and expertise when required with the understanding that any such consultation will be compensated accordingly.

The company has completed a number of assessments through the Victorian Aboriginal Cultural Heritage Register and Information System through First Peoples State Relations (Victorian Department with responsibility for maintaining the Register) as to the existence of records in relation to all of the company's plantations, with a negative result. As the estate is under freehold ownership, Native Title rights have been extinguished.

GPFL have actively sought input from the local Gunditj Mirring Traditional Owners Aboriginal Corporation to promote a positive relationship and respect.

10 High Conservation and Environmental Values

GPFL has undertaken High Conservation Value assessments across its estate. As a result, the organisation has prepared the **GPFL High Conservation Value Management Plan**. Refer to this document for further information on high conservation values.

In addition to HCV's a range of (non-HCV) environmental values that require protection have been identified across the estate. These have all been identified and recorded on the **Special Values Assessment Form** for each individual property. GPFL are also actively identifying new environmental values that require protection, and these are recorded in-field using a form created within their iauditor account. These are then included within the appropriate corporate spatial dataset for inclusion on operational maps so they can be protected.

The types of non-HCV environmental values that are being identified and protected include:

- | | | |
|-----------------------------|-----------------------------------|-------------------------------------|
| • Raptor nests | • Erosion points | • Drainage lines |
| • Dams | • Native vegetation | • Isolated remnant trees |
| • Soil issues | • High cultural sensitivity areas | • Historically interesting features |
| • Patches of native orchids | • Koalas | |

GPFL implement a range of protection, management and enhancement measures to ensure that high conservation and environmental values are not impacted and/or enhanced as a result of GPFL management. Such measures include:

- | | | |
|----------------------------------|--------------------------------|--------------------------------------|
| • Operational buffers/exclusions | • Weed control | • Pest animal control |
| • Management of road drainage | • Controlling access | • Managing illegal activity |
| • Re-establish setbacks | • Road and track design | • Crossing construction |
| • Retention of plantation trees | • Course Wood Debris retention | • Modified operational prescriptions |
| • Native revegetation | | |

GPFL strictly prohibit any conversion of native vegetation to plantation and have not participated in or had any occurrences of such on estate that it manages.

NB: All printed copies of this document are uncontrolled. Refer to the electronic copy on the Management System for the latest version.

MS:
Created: 22/12/2023
Printed: 27/06/2026

GPFL_Management_Plan_V1.1
Last Update: June 2026
Custodian: Certification Consultant

Version Number: 1.1
Review Date: June 2027
Page 5 of 11

11 Non-Timber Forest Products

A portion of the companies freehold land estate will also be managed for non-timber forest products. The freehold properties are currently being re-fenced to provide stock proof containment boundaries and add value to the property asset.

The Company strictly controls access to prevent unauthorised and illegal activities. At present, the organisation has some limited access arrangements in place as identified below.

11.1 Grazing

Where it is consistent with the age class of the trees, special and high conservation values on site, the conditions of fences and availability of water, grazing of stock on the properties is being used as a mechanism to reduce weed competition and fuel reduction for fire prevention.

11.2 Apiary

Blue gum flowers are considered a good source of nectar and pollen for bees, and the company will consider bee-keeping as an additional integration to property management as the opportunity arises.

12 Plantation Silviculture

GPFL manages its estate on a short rotation basis. This means it does not undertake any thinning operations. Plantations are grown to only be harvested at clearfall.

12.1 Species

Eucalyptus globulus is the species of choice for our market and owners and GPFL was established for the prime purpose of providing this valued resource in the form of woodchips back to Oji Holdings Corporation.

The fibre morphology properties of this eucalyptus species is considered excellent for paper making and the distinguished characteristics of the eucalyptus pulp has advantage in terms of most paper properties.

The company uses acquired land for the production of *Eucalyptus globulus*, a native species indigenous to southern Victoria and Tasmania. The species is grown for pulp production as the properties of the eucalyptus species are celebrated worldwide for the excellence they lend to papermaking. The fibre morphology of eucalyptus is distinct for these reasons.

- Fibre length is small with the average length being as low as 0.65mm.
- Fibre coarseness is the lowest of the common usual market pulp fibres.
- Number of fibres per gram is high.
- Eucalypt fibres resist collapse: not only are they slender but their wall thickness is relatively high.

As a result of these distinguished characteristics, eucalyptus pulp has numerous advantages in terms of most paper properties allowing papermakers to achieve high quality grades.

The *Eucalyptus globulus* species is also noted for its rapid growth and adaptability to a range of conditions.

12.2 Site Assessment

It is fundamental that the site be suitable for the species to be planted, to gain maximum yield at harvest. The following are some of the conditions that are assessed and evaluated prior to purchase of a property.

- | | |
|--------------------------------------|------------------------------------|
| • Estimated net plantable area | • Carrying capacity |
| • Distance to port | • Planning restrictions |
| • Hydrology | • Land-systems and soils |
| • Cultural & historical restrictions | • Rainfall |
| • Expected fibre yield | • Conservation values/restrictions |

12.3 Site Cleanup

It is GPFL's policy that our plantations have the minimum environmental impact. Site cleanup is therefore defined as the removal of certain material to clear the site for effective establishment of our plantation, generally the material is infrastructure such as fences, exotic tree windbreaks, rubbish, old equipment, dilapidated buildings, etc. Post harvest, it could also include harvest debris if heightened fire risk is identified or other logistics required.

12.4 Access roads and drainage/Plantation Layout

Effective planning, construction and maintenance of the road network including depots, landings, extraction routes and entrance points has been undertaken to enable equipment and personnel to gain access to the standing trees to remove the product.

The optimum road standard is defined by the minimum combined cost of road construction and maintenance and truck hauling. By choosing an appropriate road standard, the total costs to the company may be reduced increasing profit potential for the site.

It is imperative that the road is constructed ensuring the alignment, cross section, compaction, gravel wearing course and drainage is of a suitable standard. These standards must all comply with all legislative requirements.

12.5 Cultivation

GPFL will assess each property prior to determining which cultivation technique will be required. Cultivation can include ripping and/or mounding and is planned to manipulate water retention or distribution wherever possible, in turn reducing erosion potential. A careful assessment of the site will be undertaken to enable water management techniques designed to hold or carefully discharge water in a conservative manner.

12.6 Fencing

GPFL shall make proportional contribution to any fence requirement, as required in the *Fences Act 1968*. GPFL will endeavour to ensure all properties it manages are fully fenced.

12.7 Seedlings

GPFL's tree stock shall be selected on the basis of our own market related and trial/research and knowledge of performance of provenance selection against land system type and climatic conditions.

GPFL conduct a rigorous Nursery evaluation and monitoring of seedling growth as well as a strict quality control before accepting seedlings.

Basic seedling specification listed below:

Species	Tray Type	Root Collar Diam. (mm)	Shoot Height	Remarks
E. globulus	Hico 48 (>80ml root plug)	> 3 mm	> 20 cm < 30 cm	Seedlings must be of hardy appearance, disease and insect free with 1 leader stem.

12.8 Planting

Careful selection and management of tree stock is crucial to the initial establishment of a plantation. Correct planting techniques are required to achieve safe transplant of seedlings from container to soil. The objective is to give the seedlings the best possible start.

Spacing (m)	Stem/ha	Rainfall
4 x 2.25	1111	700 – 900mm
5 x 2.5	800	650 – 700mm
4 x 2.8	850	700mm Basalt
5 x 1.8	1111	700mm Laterite
4 x 2	1250	>850mm

12.9 Pest and Weed Control

GPFL primarily undertakes two types of weed control. Weed control associated with plantation establishment and environmental/noxious weed control. GPFL also undertakes a range of pest animal controls on an as needs basis.

Plantation establishment weed control is generally only undertaken immediately prior to the re-establishment of seedlings after harvesting. Plantation establishment weed control is not undertaken when coppice is being used as the establishment method.

Environmental/noxious weed control is undertaken across the estate to manage weeds that are an environmental pest or are a declared noxious weed. This forms part of an annual weed management programme and is also linked to the management of high conservation and environmental values.

Pest animal control is primarily undertaken using firearms when they are detected.



GPFL MANAGEMENT PLAN

Custodian: Certification Consultant

Authorised by: Director

The organisation primarily targets the following weeds and pest animals across its estate:

Weeds	Pest Animals
• African Feather Grass • Blackberry • Melinthus spp. • Pattersons Curse • Thistles • Grey Weed (Conyza) • Cape Tulip	• Feral Pigs • Deer • Foxes

GPFL comply with all of the FSC requirements with regards to the use of chemicals.

12.10 Coppice

GPFL subscribes to a “one plant one coppice” policy i.e. plant the first rotation, coppice the second rotation and then replant the third. Note, however, that this policy may be subject to local review on a compartment specific basis. No coppice reduction is being undertaken.

12.11 Fertiliser Application

Fertiliser application may be undertaken at time of planting however is undertaken on a case by case basis based on soil sampling. Whilst later age fertilising is not generally undertaken, if it were required, it would be based on foliar sampling.

12.12 Management of Operational Impacts

For the activities that GPFL conducts, GPFL has a range of Procedures, Plans and Monitoring that it puts in place to plan for and prevent off-site impacts from operations. Should an off-site impact occur from GPFL managed operations, then this will be managed as an incident and recorded, investigated and managed through the **Corrective Action Request** system.

13 Forest Planning

13.1 Planning horizons

GPFL manages two key planning horizons – a three-year plan tied to the stumpage agreements; and an annual plan to enable operational management. These two relatively shorter term planning horizons are informed by the Oji ten-year plan.

13.2 Growth and yield

GPFL maintains one key type of inventory - permanent sample plots. These are measured annually from the age of 3 years old.

GPFL are using two growth models, the EUSOP for forward prediction and Goodwin & Candy for current standing volume. GPFL are refining the yield predictions based on reconciliation of actual volumes over the weigh bridge and using this information to correlate predicted growth to land systems and rainfall.

13.3 Harvesting Rates

GPFL will harvest products from the MU at or below levels which can be permanently sustained, within the context of the size of its estate and the age class distribution of its estate. At present, timber harvesting levels are based on an analysis of best available information, including:

- Growth rates
- Yield
- Coppice v's planting
- Inventory data
- Size of the estate
- Age of crop
- Market conditions and price
- Current climatic conditions and forecast
- Environmental values including ecosystem functions
- Species and ideal harvest age for fibre content
- Forest health
- Mortality rates
- Seasonality
- Contractual obligations
- Drought impacts

Due to the size of the estate, approximately 2,900ha plantation, and the current age class distribution, timber harvesting levels are not based on a maximum allowable annual cut or sustainable yield. These plantations are short rotation Blue Gums (10-14 yrs) and will aim to be harvested within a 8-10 year window to enable maximised productivity of the site and health of the plantation.

The longer-term plan is for the organisation to acquire more properties to build the estate size and enable a better age class distribution. Over time, this will enable sustainable yield calculations to become a factor in determining harvesting levels.

NB: All printed copies of this document are uncontrolled. Refer to the electronic copy on the Management System for the latest version.

MS:
Created: 22/12/2023
Printed: 27/06/2026

GPFL_Management_Plan_V1.1
Last Update: June 2026
Custodian: Certification Consultant

Version Number: 1.1
Review Date: June 2027
Page 8 of 11



GPFL MANAGEMENT PLAN

Custodian: Certification Consultant

Authorised by: Director

13.4 Mapping

GPFL maintains spatial data relevant to its estate to enable it to undertake assessments and management of the resources within the titled areas. GPFL produces relevant maps as required to manage its estate. A map of the estate is contained within Appendix 1 of this Plan.

14 Plantation Harvesting

GPFL do not undertake any plantation harvesting operations themselves. GPFL undertakes a three-yearly tender process to enter into stumpage arrangements with the successful tenderer. Currently, ABP has the stumpage contract from 2024-2026. ABP is an FSC Certified organisation and undertakes all stumpage operations in accordance with its FSC Certification requirements.

15 Chain of Custody

GPFL sells their timber standing under a stumpage arrangement with ABP. At present there are no claims being made against that timber and ABP manage that resource under their own Controlled Wood Chain of Custody Certificate. When GPFL obtains their own forest management certification, it will be sold to ABP with the appropriate forest management claim.

16 Plantation management and protection

16.1 Forest health

GPFL operate under an ***Integrated Pest Management Plan (Forest Health Procedure)*** to enable the effective identification of forest health damage agents, impact thresholds, monitoring and control requirements.

16.2 Fire Management

GPFL annually prepare an industry standard ***Fire Management Plan*** which includes fire prevention, preparedness and response plans across the GPFL estate.

GPFL's fire prevention and preparedness schedule is planned around seasonal conditions and includes a range of techniques including grading, ploughing, slashing and spraying of firebreaks as determined on a case by case basis.

An annual pre-fire season assessment of all plantations is carried out, checking fire break condition, access and turnaround points, water availability and hazards. Fire Maps are then updated accordingly.

GPFL has its own Fire Industry Brigade (FIB) as detailed in Section 23AA of the *Country Fire Authority Act 1958* and *Country Fire Authority (Forest Industry Brigades) Regulations 1998*, with active certified members.

GPFL own a fire truck and slip on units to assist in fire protection of our assets and actively work and liaise with CFA and other industry bodies to ensure industry preparedness, co-operation and communication channels are optimised during the Fire Danger period.

16.3 Illegal Activities

Illegal activities are an on-going concern for GPFL. GPFL actively manage illegal activities through a range of mechanism and work with regulators and the police to seek regulatory outcomes where appropriate.

17 Health, Safety and ILO

The GPFL workforce is primarily comprised of contractors. Prior to commencing work with GPFL, all contractors are put through a contractor engagement process, in which items including their work health and safety system and protocols and ILO compliance are assessed.

GPFL ensure all contractors have an operational work health and safety management system that meets the requirement of the *Occupational Health and Safety Act 2004* and that they comply with the *ILO Declaration on Fundamental Principles and Rights at Work 1998*.

GPFL has developed a Safety Management System that is comprised of a series of Policies, Procedures, Forms and Records. This Safety Management System documentation is recorded in the ***Document and Record Management Procedure***.

GPFL have a ***Core Labour Policy*** in place, which commits to compliance with legislative requirements and to compliance with the ILO requirements.



GPFL MANAGEMENT PLAN

Custodian: Certification Consultant

Authorised by: Director

18 Monitoring and measuring

There are a number of monitoring mechanisms GPFL has in place that is essentially monitoring or measuring for different purposes. The table below identifies the primary purposes for monitoring and measuring.

Compliance/Conformance	Compliance/conformance is monitoring and measuring whether the activity is being/has been carried out in accordance with planned arrangements. <i>Legal and other requirements, policies, procedures, SOP's, certification standards, quality control standards, elements of the MS, direction from GPFL representatives, any planned arrangements.</i>
Conditions	Conditions refers to measuring/evaluating the condition of a site or area that is purely a measure of what is present/happening at any given time. It is a measure/statement of fact. <i>Weather, measurable site conditions (e.g. FDI, Drought Factor), resource area statements, resource volume statements.</i>
Effectiveness and Relevance	Effectiveness and relevance refers to monitoring and measurement of whether the requirement has been effective or relevant in achieving what it set out to achieve. <i>Legal and other requirements, policies, procedures, SOP's, CAR's, risk assessments, quality control standards, practices, root cause analysis, incident investigations.</i>
Outcomes	Outcomes refers to monitoring and measurement of an activity, operation, practice, product or site where there is a gap in knowledge or the measure is outcomes driven. <i>Volume and product assessments of stands, area's treated, area harvested or planted, trials, research.</i>
Performance	Performance refers to monitoring and measurement of performance against set criteria/targets. <i>Objectives, targets and indicators, quality control standards.</i>
Progress	Progress is monitoring and measurement of progress towards a set objective. <i>Operations, Programs, Plans, Budgets.</i>
Quantity	Quantity is a measure of stock or amount of something. <i>Amount of chemical used, number of animals controlled.</i>
Site	Site refers to the monitoring or measurement of a site. <i>Road drainage, inventory processes, forest health, workplace inspections.</i>

GPFL ensure that our plantations are monitored consistently and systematically to ascertain preventative, protective and remedial measures through out the life of the plantation. GPFL undertake the following monitoring:

- Operational Monitoring
- Resource Monitoring
- Financial Monitoring
- Stakeholder Monitoring
- Personnel Monitoring
- Management System Monitoring
- Workplace Monitoring

GPFL has a **Monitoring Procedure** in place which fully outlines how, when and why monitoring and measuring is undertaken and how it is used to inform continuous improvement.

19 Review

The GPFL Management Plan will be reviewed every 5 years or following significant changes to operations, standards or legislation, taking into account results from monitoring and stakeholder input. The review will be complimented by results of independent third party audit programs.

Version Control

Date reviewed/approved	Version	Main changes
February 2025	1.0	Document development and issue
June 2026	1.1	Minor changes in area and trademark standard

NB: All printed copies of this document are uncontrolled. Refer to the electronic copy on the Management System for the latest version.

MS:
Created: 22/12/2023
Printed: 27/06/2026

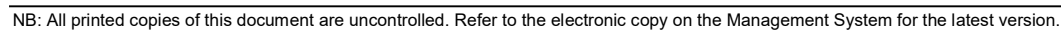
GPFL_Management_Plan_V1.1
Last Update: June 2026
Custodian: Certification Consultant

Version Number: 1.1
Review Date: June 2027
Page 10 of 11



Authorised by: Director

Appendix 1. Estate Map



GPFL_Management_Plan_V1.1
Last Update: January 2024
Custodian: Certification Consultant

Version Number: 1.0
Review Date: January 2026
Page 11 of 11