

Purpose and Scope

The purpose of the Modern Slavery Policy (the Policy) is to set out the approach of OfficeMax New Zealand Limited (OfficeMax) to the identification, assessment, and prevention of modern slavery risks in our operations and across our supply chain.

Modern slavery is the severe exploitation of a person who cannot leave due to threats, violence or deception. It includes forced labour, debt bondage, forced marriage, slavery, and human trafficking.¹

The Policy is informed by the UN Declaration of Human Rights and the ILO Core Labour Standards and establishes the minimum expectations that suppliers must meet as a condition of doing business with us. The Policy is to be implemented alongside all applicable local laws and will be subject to regular verification through audits and on-site inspections.

The Policy applies to all people working for OfficeMax and suppliers we work with directly, including all employees, temporary workers, Tier 1 product and overhead suppliers.

Tier 1 product suppliers are those that OfficeMax purchases products from directly to then sell to customers. Tier 1 overhead suppliers provide OfficeMax with products and services to support the day-to-day operations of our business. OfficeMax expects all suppliers to adopt sound labour practices and to treat their employees fairly in accordance with local laws and regulations.

Corporate Governance

OfficeMax's Managing Director has overall responsibility for the approval and administration of the Policy. The implementation of the Policy sits with the respective departments at OfficeMax who deal directly with our employees and suppliers as outlined below. Other interested parties of the Policy are Government, regulators, OfficeMax team members and the communities we work in.

BUSINESS PROCESSES	
<p>People and Capability</p> <p>Responsible for the identification of modern slavery risks within our operations for our employees and temporary workers.</p>	<p>Sourcing</p> <p>Responsible for the day-to-day management of offshore product supplier relationships and supporting implementation of the Policy.</p>
<p>Finance</p> <p>Responsible for the management of overhead supplier relationships and supporting implementation of the Policy.</p>	<p>Merchandise</p> <p>Responsible for the day-to-day management of local product supplier relationships and supporting implementation of the Policy.</p>
<p>Legal</p> <p>Responsible for responding to our whistleblower grievance mechanism, and ensuring compliance with legal and regulatory obligations related to labour rights and modern slavery.</p>	<p>Sustainability</p> <p>Responsible for implementation of our modern slavery mitigation programme.</p>

¹ 2022 Ministry of Business Innovation and Employment definition: <https://www.mbie.govt.nz/have-your-say/modern-slavery>

OfficeMax's operations and suppliers

OfficeMax's primary operations are based in New Zealand and include the sale, warehousing, and distribution of products to customers nationally.

Approximately 90% of the products OfficeMax sell to customers are sourced from local suppliers and 10% from offshore suppliers (based on spend). The inherent risk of OfficeMax's suppliers has been categorised based on geography and product type (informed by Walk Free's Global Slavery Index 2023 report). The following table outlines the types of products and services OfficeMax procures and from which countries.

	OFFSHORE PRODUCT SUPPLIERS	LOCAL PRODUCT SUPPLIERS	OVERHEAD SUPPLIERS
Countries sourced from	China, Hong Kong, Taiwan, Indonesia, Japan, South Korea, Malaysia, India, Germany, Australia, Sweden	New Zealand	Australia, France, Hong Kong, Ireland, Malaysia, North Macedonia, Serbia, Singapore, Switzerland, The Netherlands, United Kingdom, the United States of America
Types of products/ services sourced include but are not limited to	Paper, books, stationery, tissues, cleaning, hygiene, packaging, furniture, textiles (gloves)	Food, beverages, furniture, cleaning, hygiene, paper, books, stationery, packaging, textiles (health & safety apparel), technology	IT services, software, utilities, financial and professional services, entertainment, cleaning, education and training, health and social services, freight

Responsibilities

OfficeMax is responsible for identifying, assessing and preventing modern slavery risks in our operations and supply chain, and for ensuring all business units comply with the Policy and escalate concerns appropriately.

OfficeMax operations

- OfficeMax complies with all applicable employment laws and regulations in New Zealand, as well as internal employment policies.
- All distribution centre workers have the right to freedom of association, including the right to join a union.
- Temporary workers are engaged via approved recruitment agencies and all triangular employment contracts must comply with New Zealand employment laws. The primary relationship is between the temporary worker and the recruitment agency. OfficeMax conducts regular reviews and meetings with these agencies.
- Recruitment agencies must not charge any fees to temporary workers at any stage of the recruitment or employment process.
- OfficeMax may request a copy of contracts from the recruitment agency at any time to ensure terms and conditions are consistent with laws and regulations in New Zealand.
- The health, safety and wellbeing of temporary workers is within OfficeMax's scope of responsibility.

Local product suppliers

- All product suppliers are required to attest and adhere to OfficeMax's Responsible Supplier Code (RSC), which includes requirements related to modern slavery and human rights.
- Non-attesting or one-off product suppliers will be assessed for their compliance with this RSC through equivalent policies and procedures covering the RSC's minimum requirements.
- A self-assessment questionnaire will be completed by suppliers to assess ongoing compliance of the RSC.
- Where a supplier is unable or unwilling to remediate identified issues despite reasonable support and clear timelines, OfficeMax may ultimately determine that termination of the supply relationship is necessary, consistent with responsible exit principles.

Offshore product suppliers

OfficeMax applies additional due diligence requirements to offshore product suppliers.

- OfficeMax requires all offshore product suppliers' factories to be audited annually by a third-party to an internationally recognised social compliance standard². Suppliers must submit audit reports to OfficeMax annually for review.
- Suppliers are required to close out material corrective actions within a reasonable timeframe if compliance is not met.
- Where major corrective actions are not addressed, OfficeMax will follow up and support suppliers in resolving these.
- If a supplier refuses to cooperate, fails to remediate major risks, and misconduct is confirmed, OfficeMax will terminate the supply relationship in line with responsible exit principles.

Overhead suppliers

- OfficeMax will identify and assess modern slavery risks amongst its overhead suppliers, using a tiered approach, and targeting offshore suppliers first.
- Overhead suppliers are required to demonstrate compliance with the modern slavery standards set out within OfficeMax's Responsible Supplier Code (RSC).

Reporting, investigation and escalation of breaches

All actual and suspected breaches of the Policy can be reported by anyone via [OfficeMax's Whistleblower Hotline](#). The Whistleblower Policy, managed by the Group General Counsel & Company Secretary, undergoes annual review by the Legal team to ensure its currency and compliance. Reports can be made by any individual, including employees, suppliers, contractors, and members of the public. All reports are handled in strict confidence. Non-retaliation measures are clearly outlined to protect whistleblowers, encouraging all employees and suppliers to report concerns about unethical, illegal or improper behaviour.

Internal investigation responsibilities

- Breaches relating to OfficeMax workers will be investigated by the Director of People and Capability, and the Group General Counsel & Company Secretary.
- Findings may result in disciplinary action, corrective measures, or escalation to external authorities raised by the Director of People and Capability and the Group General Counsel & Company Secretary where required.

² Accepted standards include: SA8000; Industry Council of Toy Industry Certification (Class A, B, C); World Responsible Accredited Product Certification (Platinum and Gold Levels); Business Social Compliance Initiative (Good, A, B or C Grading Level); Responsible Business Alliance Certification; Sedex Members Ethical Trade Audit.

Supplier related breaches

- Breaches involving suppliers will be investigated by the Senior Sustainability Advisor with support from the relevant department lead.
- Investigations will assess the nature and severity of the breach and whether the supplier has acted in accordance with relevant OfficeMax policies.
- Following an investigation, OfficeMax may require immediate corrective action, increased monitoring, temporary suspension, or termination of the supplier relationship, as approved by the Director of the department responsible.

Media or third-party allegations

- If OfficeMax is made aware of instances of modern slavery in our supply chain via media channels, OfficeMax will contact the supplier to obtain information, request evidence of remediation, and assess the integrity of their response.
- If the supplier cannot demonstrate effective remediation or shows no intention of addressing root causes, OfficeMax will terminate the supply relationship, in line with responsible exit principles.

Record keeping

OfficeMax will maintain records of all reported, investigated, and substantiated breaches of the Policy for a minimum of six years, in accordance with legal and internal governance requirements.

Remediation

OfficeMax is committed to ensuring that any instance of modern slavery identified within our operations or supply chain is addressed promptly, appropriately and in a manner that prevents recurrence, protecting affected workers. The actions taken to remediate instances of modern slavery will depend on the severity of the breach and the circumstances surrounding it.

Remediation in our operations

In instances where modern slavery has been identified in our own operations, OfficeMax's People and Capability team will ensure appropriate and timely remediation for affected workers, either directly or in coordination with relevant third parties.

Remediation in our supply chain

In instances where modern slavery has been identified within a product or overhead supplier's operations, OfficeMax will require the supplier to undertake and complete effective remediation within a reasonable and clearly defined timeframe.

Root Cause Analysis

When serious non-compliance or modern slavery risk is identified, OfficeMax may undertake a root cause analysis to understand the systemic factors contributing to the issue.

This analysis may examine underlying causes such as:

- Failures in processes or oversight
- Gaps in training or competence
- Misaligned management systems or contractual practices.

The purpose of the analysis is to ensure that any subsequent actions address the root cause rather than the symptoms. Findings from the analysis will inform future risk mitigation, supplier engagement, or internal capability-building efforts.

Corrective action plan

Where required, OfficeMax may mandate a formal Corrective Action Plan (CAP). A CAP outlines the actions a supplier must take to rectify the issue, prevent recurrence and demonstrate sustained alignment with relevant OfficeMax policies and modern slavery expectations.

CAPs must:

- Clearly define required actions and responsibilities
- Include realistic but enforceable timeframes
- Be developed in consultation with relevant stakeholders, including affected suppliers
- Be monitored by OfficeMax to ensure implementation and effectiveness.

Progress may be subject to additional oversight, audits or verification activities as appropriate.

Communication with customers

If a significant or serious incident of modern slavery is confirmed, OfficeMax will notify customer groups that regularly purchase products from the affected supplier. Customers will be provided with clear information about:

- The nature of the incident
- The remediation steps being undertaken
- Any implications for product availability.

Customers will be offered the option to continue purchasing the product or transition to an alternative.

Reporting

OfficeMax will prepare and disclose actions we have taken to identify, assess, and prevent modern slavery risks across our operations and supply chain. This information will be included in OfficeMax's annual Sustainability Report of which will be made publicly available on the OfficeMax [website](#).