

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

The West Fraser Timber Co. Ltd. and its subsidiaries and affiliates (“**West Fraser**” and/or the “**Company**”) is committed to conducting its business in an honest and ethical manner reflecting the highest standards of integrity and in compliance with all applicable laws and regulations.

This Anti-Bribery and Anti-Corruption Policy (the “**Policy**” or “**ABAC Policy**”) is intended to help West Fraser directors, officers and Employees (collectively, “**West Fraser Personnel**”) better understand and manage the bribery and corruption risks that can arise in our business dealings. All West Fraser Personnel must familiarize themselves, and comply, with this Policy.

Capitalized terms used in this Policy, which address key terms relevant to compliance with anti-bribery and anti-corruption laws, are defined in **Section 14** below.

### 1. SCOPE

A range of applicable laws prohibit bribery and corruption in connection with a company’s business dealings, including its interactions with government entities, Public Officials, and private persons. This Policy contains the Company’s mandatory standards to achieve compliance with such applicable laws. West Fraser operates in markets around the world and applicable laws include, without limitation, the *Canadian Corruption of Foreign Public Officials Act*, the *Canadian Criminal Code* the U.S. *Foreign Corrupt Practices Act* (“FCPA”), and the U.K. *Bribery Act 2010*. In some countries, local laws and regulations may be more stringent than the principles set out in this Policy, in which case the more stringent provisions apply.

West Fraser strictly prohibits bribery and corruption in any form and in all our operations. Bribery is illegal, harms our business and the communities we work within, undermines fair trade, and exposes the Company and its Personnel to significant financial, legal, and reputational risk. West Fraser will not pursue business opportunities where the business cannot be won ethically and legally.

### 2. OVERSIGHT AND RESPONSIBILITY

The Anti-Bribery and Corruption Committee comprised of the Chief Executive Officer, the Chief Financial Officer and the Senior Vice-President, Corporate and Government Relations (the “**ABAC Committee**”) shall be responsible for overseeing the Company’s compliance with this Policy.

2.1. The ABAC Committee shall ensure that:

- a) this Policy remains up-to-date and reflects changes to the Company's business activities, and to applicable laws and regulations;
- b) this Policy is properly implemented and operating effectively, including by ensuring compliance reviews or audits are performed at reasonable periodic intervals (in any event no less than every two years).
- c) all West Fraser Personnel are aware of and trained in compliance with this Policy in accordance with their respective responsibilities;
- d) a version of this Policy and suitable training materials are available in local languages to ensure all West Fraser Personnel can readily understand the requirements and expectations placed upon them;
- e) all West Fraser Personnel have access to support and advice when confronted with situations involving potential risk; and
- f) this Policy is enforced by way of appropriate discipline.

2.2. ABAC Committee shall report to the Board of Directors on the Company's compliance with this Policy periodically as requested by the Board of Directors.

**3. PROHIBITION OF IMPROPER PAYMENTS**

3.1. West Fraser Personnel must never promise, authorize, offer or provide a Bribe. As reflected in the Definitions at Section 14 below, and at a practical level, this prohibits the promise, authorisation, offer or provision of:

- 3.1.1. Anything of Value
- 3.1.2. to or from any person, whether a Public Official or in the private sector
- 3.1.3. directly or indirectly (e.g., through an Intermediary)
- 3.1.4. to achieve an improper purpose or advantage related to the business of West Fraser.

3.2. While all forms of bribery and corruption are strictly prohibited under this Policy, West Fraser Personnel are cautioned that bribery is particularly egregious and damaging

when it involves Public Officials. As a result, this Policy contains special rules for dealings with Public Officials, and the utmost vigilance must be exercised in any engagement with such persons.

3.2.1. The term "Public Official" is fully defined in Section 14 below, and it is critical that West Fraser Personnel are familiar with the full scope of this definition, as it is not always obvious who may fall within it. In this regard, West Fraser Personnel should be mindful that, among others, employees of government-owned or controlled entities will generally be Public Officials, as will leaders of First Nations and other indigenous groups or organisations.

3.3. West Fraser Personnel must never, directly or indirectly, request or accept a Bribe from any person or organization.

3.4. West Fraser Personnel must never offer or pay Kickbacks, nor request or accept a Kickback from another contracting party.

3.5. West Fraser Personnel must never make or offer a Facilitation Payment (as defined in Section 14). While legal in certain jurisdictions, Facilitation Payments are illegal under laws applicable to West Fraser (including the laws of Canada) and are therefore strictly prohibited by this Policy.

#### 4. EXTORTION

4.1. The Company and its Representatives shall not, directly or indirectly, engage in or be party to any acts of extortion in connection with the Company's business interests. Any attempts at or instances of Extortion, whether directed at the Company or its Representatives shall be immediately reported to the ABAC Committee and the General Counsel.

4.2. **However**, in circumstances where there is an **immediate** and **serious** threat to the personal **health and safety** of one or more persons, or of **catastrophic physical damage** to a material West Fraser asset or to the environment, and there is no reasonable safe opportunity to consult the ABAC Committee and the General Counsel prior to taking action, West Fraser Personnel may take reasonable and proportionate steps to avert the threat, including by taking steps that might, in other circumstances, amount to a violation of this Policy. In all such cases, the circumstances of the threat and the steps taken to avert it must be reported to the General Counsel as soon as reasonably possible.

## **5. HIGH RISK JURISDICTIONS**

- 5.1. The Company recognizes that some jurisdictions present greater risks than others regarding Bribery, Kickbacks and Extortion. West Fraser must be alert to bribery and corruption risks in all places that the Company does business, but heightened vigilance is required for business transactions that may be connected to jurisdictions with widespread corruption or a history of bribery violations, where the local government or government officials are heavily involved in the local economy, or where state-ownership is prevalent. Up-to-date and country-by-country analysis of corruption levels is available in the Transparency International Corruption Perceptions Index at [www.transparency.org/research/cpi](http://www.transparency.org/research/cpi).

## **6. GIFTS, HOSPITALITY AND ENTERTAINMENT**

- 6.1. Building long-term relationships based on trust and mutual respect is an important objective for the Company. The Company recognizes that providing reasonable and proportionate hospitality can be an appropriate means of promoting this legitimate objective. Equally, however, gifts and hospitality also present a bribery and corruption risk if used excessively or otherwise inappropriately.
- 6.2. Small gifts or mementos, such as West Fraser branded items (pens, ball caps, mouse pads, golf balls etc.), and modest hospitality and entertainment in the context of business meetings or functions, may be given or accepted on the Company's behalf if they are:
- (a) Infrequent;
  - (b) of small value.
  - (c) given in a direct and transparent manner.
  - (d) permissible under local law; and
  - (e) are clearly and accurately recorded, and where applicable (such as for meals, drinks or events), are documented with supporting evidence (such as receipts or invoices).
- 6.3. Cash or cash equivalents (e.g., gift cards or vouchers) are never permissible as gifts.
- 6.4. Gifts, hospitality and entertainment must not be intended or appear to be intended to influence any business act or decision of the recipient. Put differently, gifts, hospitality or entertainment must not be given in exchange for or as a "quid pro quo" for a benefit of any kind or to create a sense of obligation on the part of the recipient.
- 6.5. As a general matter, heightened caution and care should be exercised prior to giving or offering any gifts or hospitality to Public Officials, since what may be acceptable in

the private sector may not be acceptable when dealing with Public Officials. Public Officials are generally subject to stricter rules regarding what they can accept as gifts or hospitality, reflecting the public nature of their role and duties. In addition, in certain circumstances such as in the context of communications or discussions with Public Officials about a proposed law, policy, program or contracting opportunity, lobbying rules may apply in addition to bribery and corruption laws, which may further restrict the offering of gifts and hospitality. If in any doubt, consult with a member of the ABAC Committee, one of the Company's legal counsel, or your supervisor to obtain guidance.

- 6.6. Representatives shall not provide gifts, entertainment or hospitality to persons who accompany Public Officials to Company business meetings, congresses or comparable events where the attendance of such persons does not have a legitimate business purpose.

## **7. PAYMENT OF TRAVEL EXPENSES OF PUBLIC OFFICIALS**

- 7.1. In rare circumstances, the Company may be asked to pay or reimburse travel or lodging reasonable expenses incurred in good faith by or on behalf of a Public Official in relation to the performance or execution of a contract. Such occasions might include a site visit or inspection of company facilities, attending necessary training, or the attendance of an opening ceremony for a Company project. Any such travel or lodging expenses require the prior written approval of a member of the ABAC Committee, which will only be given if:
  - (a) there is a clear, justifiable purpose for such expenses which is directly related to the demonstration or performance of Company products or services;
  - (b) the payment of such expenses is legal under all applicable laws, and any rules or policies applicable to the Public Official; and
  - (c) steps are taken to ensure the expenses are properly recorded in the Company's books and records in reasonable detail such that they accurately and transparently reflect the true nature and amount of the transaction.
- 7.2. Expenses for "side trips", such as leisure excursions or unnecessary stopovers in destinations unrelated to the business purpose of the trip are prohibited and will not be approved.
- 7.3. Travel and lodging expenses of spouses, children, companions, or friends of Public Officials or private parties will not be paid or reimbursed by the Company, unless there are truly exceptional circumstances that provide a compelling and legitimate basis for the travel, and West Fraser's General Counsel has been able to verify that the payment of the expense complies with all applicable laws.

## **8. POLITICAL CONTRIBUTIONS AND DONATIONS**

- 8.1. As reflected in West Fraser's [Code of Conduct](#), (while acting on behalf of the Company) political contributions, including money, assets, property or other things of value (such as employee working hours spent on campaigns), must not be provided by the Company or any person acting on its behalf, unless such donation has the prior approval of the Board Chair or President and Chief Executive Officer.
- 8.2. In all cases, such political donations shall only be made in accordance with applicable law, and all requirements for public disclosure of such contributions shall be fully complied with. To ensure compliance with these requirements, prior to giving any approval, it may be necessary to obtain legal advice to confirm the legality and propriety of any such proposed expenditures.
- 8.3. Nothing in this Policy is intended to restrict or limit the ability of West Fraser Personnel to engage in the political process in a purely personal or private capacity (including by donating using their personal time or resources), provided any such activity is unrelated to the business of West Fraser.

## **9. CHARITABLE DONATIONS AND SOCIAL CONTRIBUTIONS**

- 9.1. West Fraser invests in the communities where our employees live and work. Donations and contributions will be may be made in accordance with West Fraser's policy and guidelines for investment and should meet these requirements:
  - 9.1.1. The organization is not affiliated with a Public Official who has decision-making authority or other influence relevant to the Company's business;
  - 9.1.2. The contribution is made in accordance with applicable laws;
  - 9.1.3. The contribution is made, recorded and reported in accordance with applicable accounting or expense policies or rules.
- 9.2. As a matter of general policy, the Company and its Representatives shall not give grants or donations at the request of any Public Official who may be in a position to provide a benefit to the Company.

## 10. HIGHER RISK COUNTERPARTIES

10.1. West Fraser deals with a variety of counterparties, including customers, Contractors, Joint Venture Partners, and Intermediaries. For the purposes of managing and mitigating bribery and corruption risks associated with its counterparties, West Fraser conducts background screening and due diligence on a risk-based approach. This means that the level of due diligence required in relation to a counterparty should be in proportion to the level of risk presented - the higher the risk, the more extensive the due diligence.

10.2. Certain counterparties present a potentially higher degree of bribery and corruption risk. A non-exhaustive list of higher risk indicators, or “red flags”, appears at Appendix A to this Policy, and West Fraser Personnel should familiarize themselves with it. However, at a general level, the level of risk associated with a counterparty may be elevated by factors such as:

10.2.1. The inherent risk associated with the jurisdiction in which the counterparty is based or headquartered, and/or in which the transaction between West Fraser and the counter party is to be conducted;

10.2.2. Whether the counterparty is a government-owned entity, or may be required interact with Public Officials on behalf of West Fraser or to further West Fraser’s business interests;

10.2.3. The volume or value of business conducted with the counterparty (high-value transactions or relationships warrant more robust due diligence);

10.2.4. Whether the counterparty has any association with a Public Official, or a family member or other close associate of a Public Official;

10.2.5. Whether the counterparty, or its affiliates or beneficial owners, have any association with a country that is targeted by applicable economic sanctions laws (for information as to which countries are targeted by Canadian sanctions, see: <https://www.international.gc.ca/world-monde/international-relations-relations-internationales/sanctions/current-actuelles.aspx?lang=eng> )

10.3. It is the obligation of West Fraser Personnel to identify higher risk counterparties and ensure that appropriate due diligence is undertaken, including in accordance with any guidance or protocols implemented by the Company from time-to-time. For higher risk counterparties, due diligence should include at least the following:

- 10.3.1. Determining the directors, officers, key employees, and significant beneficial owners of the counterparty;
- 10.3.2. Screening the directors, officers, key employees, and significant beneficial owners of the counterparty against applicable economic sanctions lists, such as those of Canada, United Kingdom, USA, the European Union and the United Nations;
- 10.3.3. Assessing reputation, qualifications and past performance of the prospective counterparty;
- 10.3.4. Identifying the existence and extent of anti-bribery/anti-corruption policies and procedures adopted by the counterparty;
- 10.3.5. Ongoing monitoring of the relationship after contracting, to identify any increase in the risk profile of the counterparty or the emergence of new red flags.

#### ***Intermediaries***

- 10.4. By virtue of their interaction with Public Officials, Intermediaries (as defined in Section 14 below) generally pose elevated bribery and corruption risks. As such, in addition to conducting enhanced due diligence, all Intermediaries must be engaged using a written agreement, which must contain provisions designed to promote ethical business practices, and to entrench the Intermediary's obligation to comply with the letter and spirit of this Policy, as well as applicable anti-bribery and anti-corruption laws.

#### ***Joint Venture Partners***

- 10.5. The Company expects its Joint Venture Partners to uphold the principles established in this Policy, and West Fraser Personnel shall ensure that they draw the attention of Joint Venture Partners to the provisions of this Policy. In addition, specific requirements may be placed on Joint Venture Partners, such as through Joint Venture Agreement terms, to entrench their commitment to complying with the letter and spirit of this Policy and all applicable anti-bribery and anti-corruption laws.

#### ***Entities Associated with Public Officials or their Family Members/Associates***

- 10.6. The Company shall exercise the utmost caution when entering any contract or other business relationship with a counterparty associated with a Public Official, including any business entity owned by a Public Official or by their close relatives or associates (such as current or former business partners). All such contracts or business relationships require, at a minimum:



- 10.6.1. confirmation that any such contract or business relationship complies with applicable laws;
  - 10.6.2. confirmation that the contract or business relationship is commercially justified on objective grounds, and is conducted at arms-length and without any intent to influence the actions of a Public Official in their official capacity;
  - 10.6.3. measures to ensure transparency vis-à-vis the relevant public entity for which the Public Official performs their official public duties.
- 10.7. In most scenarios, entering contracts or business relationships with counterparties that are associated with Public Officials, or their family members/associates will not be appropriate, and accordingly these transactions will not be approved lightly. However, there may be circumstances where such relationships have a legitimate and appropriate rationale or context:
- 10.7.1. For example, consistent with West Fraser's commitments to increasing the participation of Indigenous Peoples in our business (per the Company's [Indigenous Peoples' Policy](#)), West Fraser may identify contracting or business opportunities that are of interest to entities that employ or are owned by family members of the Indigenous community leadership, especially where the community is small and/or comprised of a several groups sharing common family bonds. It may be unfair, arbitrary and/or practically unworkable to exclude entities associated with family members of community leaders from such business opportunities, and in such circumstances, some flexibility may be required. However, in all cases, applicable laws must be adhered to, and the required approval of the Company's General counsel must be obtained to ensure compliance.
  - 10.7.2. , West Fraser Personnel must ensure they review, consider and provide all relevant factual information to inform the analysis and corresponding decision making in accordance with applicable laws.

## **11. BOOKS AND RECORDS**

- 11.1. The purpose of this Section is to prevent the concealment of Bribes and to discourage fraudulent accounting practices.

- 11.2. The Company and its Representatives shall ensure that the Company's books and records accurately reflect the Company's transactions, and that such transactions are recorded with sufficient detail so that knowledgeable third parties can understand the purpose, amount, and counterparties involved in any transaction.
- 11.3. "Off-the-books" accounts, and false or deceptive entries in the books and records, are strictly prohibited. Secret accounts or unmonitored "slush funds" are strictly prohibited.
- 11.4. Key contract documents and approvals are to be retained, either in hardcopy or in secure electronic format, in line with the Company's regional and local record retention policies.
- 11.5. West Fraser Personnel must retain a record of all communications with Public Officials and must ensure such records are saved and stored to company systems (instead of purely personal devices, or via messaging apps that are not readily accessible to the Company).

## **12. VIOLATIONS**

- 12.1 West Fraser Personnel who violate this Policy will face disciplinary action, up to and including dismissal. Depending on the circumstances, violations also may result in the loss of benefits under the Company's incentive plans, including loss of incentive compensation, bonuses, or other awards. In addition, bribery and corruption is a serious criminal offence and law enforcement agencies may hold West Fraser Personnel liable in their individual capacity for violating such laws, resulting in imprisonment and/or significant fines or penalties.

## **13. COMPLIANCE AND REPORTING OF VIOLATIONS: "WHISTLEBLOWING"**

- 13.1 It is the responsibility of each representative to promptly report any suspected contraventions of this Policy or applicable law in accordance with the "Compliance and Reporting" provisions of West Fraser's [Code of Conduct](#), either by:
  - 13.1.1 leaving a voice report with the Company's Director of Internal Audit at (604)895-2763 or by mailing or couriering a report to the Company's head office at 885 West Georgia Street, Suite 1500, Vancouver, BC, V6C 3E8, addressed to the Director of Internal Audit and marked "Personal and Confidential"; or

13.1.2 through our reporting hotline managed by ClearView Connects, which is set up to receive confidential and, if required, anonymous reports, via [www.clearviewconnects.com](http://www.clearviewconnects.com) , or via the North American Hotline: 1 (866) 608-7287 or European Hotline: 00 800 9643 9643.

13.2 West Fraser does not permit retaliation of any kind for reports of misconduct by others made in good faith. Any instances of such retaliation will result in disciplinary action.

## 14. DEFINITIONS

<i>Anything of Value</i>	This refers to any material benefit and should be interpreted broadly, but examples include: <ul style="list-style-type: none"> <li>• cash or equivalent payments;</li> <li>• loans, gifts and favours;</li> <li>• jobs or consulting arrangements (whether phony or genuine);</li> <li>• donations to preferred political or charitable causes;</li> <li>• benefits of any kind granted to related third parties (such as family members); and</li> <li>• Entertainment, travel and other forms of non-cash incentives.</li> </ul>
<i>Bribe or Bribery</i>	The giving, offering or promising to give, whether directly or indirectly, Anything of Value, to a person (whether a Public Official or in the private sector) in order to obtain or retain business or gain a business advantage for the Company.
<i>Contractor</i>	A person or an entity who supplies materials, labour or services to the Company.
<i>Employee</i>	A temporary or permanent employee of the Company, including independent contract workers and interns.
<i>Extortion</i>	Obtaining or attempting to obtain something of value by force, threats or persistent unjustified demands.
<i>Facilitation Payments</i>	Also known as “grease” payments, these may be generally defined as modest, unofficial payments to a Public Official in their personal capacity to secure or expedite a routine, non-discretionary government action (e.g., speeding up customs clearance)
<i>Joint Venture Partner</i>	An entity with whom West Fraser is jointly collaborating to pursue or operate a particular project
<i>Intermediaries</i>	Consultants or Contractors who interact with foreign governments or their agencies and instrumentalities (including state-owned or controlled entities) on the

	Company's behalf. Non-exhaustive examples include freight forwarders, customs brokers, tax consultants, lobbyists, or other third parties who assist West Fraser in obtaining licenses or similar government approvals or consents.
<i>Improper Payment</i>	A Bribe, Kickback, or extortion-related payment, or any other provision of a gift or benefit that is contrary to this Policy.
<i>Kickback</i>	The secret or non-transparent payment of consideration to an agent (including an employee or consultant) of another contracting party. This includes the improper or secretive use of sub-contracts, purchase orders, consulting agreements, or gifts in order to channel payments to representatives of another contracting party, or to their relatives or business associates.
<i>Public Official</i>	<ul style="list-style-type: none"><li>• Any person holding a legislative, administrative or judicial office of a state or any subdivision of a state (including a province or municipal government);</li><li>• Any person exercising a public function, paid or unpaid, including a person employed by a board, commission, company or other body or authority that is established to perform a duty or function on behalf of a state or subdivision of a state (including a province or municipal government);</li><li>• Any official or agent of a public international organization (e.g., International Monetary Fund, United Nations, World Bank);</li><li>• A political party, an official of a political party, or a candidate for political office; and</li><li>• Any person who by virtue of law, culture or traditions exercises influence on the decision making of persons described above, including First Nations Chiefs, Councillors and Tribal Elders, and leaders of other indigenous bodies.</li></ul>

*Approved by the Board of Directors on December 12, 2023.*

## **APPENDIX A**

### **"RED FLAG" DUE DILIGENCE ITEMS**

In the event any West Fraser Personnel identifies one of the red flags listed below, they should seek direction from a member of the ABAC Committee, one of the Company's legal counsel or any Vice-President of the Company, or your supervisor. The list below is not exhaustive, and West Fraser Personnel should use sound judgment to assess issues as they arise.

#### **TRANSACTION RED FLAGS**

- The counterparty refuses to confirm in writing that it will abide by applicable bribery laws or is ignorant of or indifferent to local laws and regulations.
- Evidence of family or business ties between a counterparty and a Public Official.
- The counterparty has a bad reputation or is the subject of credible and substantial rumors or media reports of inappropriate behavior.
- The counterparty requests that its identity or its relationship with the Company or a Public Official not be disclosed.
- A Public Official recommends the counterparty. This could suggest a coordinated scheme to divide a payoff.
- The counterparty lacks appropriate facilities or qualified staff or appears to be ill-qualified for the job it is supposed to provide.
- The counterparty uses shell companies that obscure ownership without a credible explanation, or refuses to disclose owners, partners or principals.
- There are misrepresentations or inconsistencies in the counterparty's representations, particularly regarding its qualifications, or its owners, partners or principals.
- The counterparty provides a business reference who declines to respond to questions or who provides an evasive response.

#### **PAYMENT RED FLAGS FOR INTERMEDIARIES AND CONTRACTORS**

The following red flags may indicate that an Intermediary or Contractor is paying or intends to pay bribes or kickbacks in order to accomplish the tasks requested by the Company:

- Excessive or unusually high compensation. The appropriate compensation will vary depending upon the extent of the Intermediary's/Contractor's obligations and expertise, the risk that the Intermediary/Contractor will assume or take on, whether it is committing its own capital to the venture, and representatives must exercise good judgment in assessing its appropriateness. High levels of expenses are a red flag, especially if they are vague or poorly documented.
- Requests for unusual bonuses or extraordinary payments.
- Requests for an unorthodox or substantial up-front payment, a request that invoices be backdated or altered, or requests for unorthodox payment methods.
- Requests that cheques be made out to "cash" or "bearer," or that payments be made in cash, or that invoices be paid in some other anonymous form or to unknown third parties.
- Requests for increase in compensation during the contract term, without a clear and compelling commercial justification.
- Requests for payments to a bank account in a country other than the Intermediary's/Contractor's country of residence or the country of the business activity, into a numbered account or to third parties or their bank account.

**SAMPLE QUESTIONNAIRE – FOR HIGHER RISK THIRD PARTIES**

- 1) Your entity's legal name & address.
  - a) For companies - please list main office, all branches, and subsidiaries.
  - b) For individuals - please list full name, nationality, year of birth, and personal/professional address.
- 2) If incorporated, list your entity's country of incorporation or registration (if applicable, please provide registration number and tax identification number).
- 3) Type of business (e.g., proprietorship, partnership, corporation, individual).
- 4) Nature of business expertise and length of time in business.
- 5) Contact information in connection with your proposed relationship with West Fraser (include any P.O. Box, street address, telephone and fax numbers, e-mail address).
- 6) Please identify the direct owners and shareholders of your entity (including any beneficial owners of the group of companies to which your entity belongs) and provide an organization chart if available.
  - a) If company is publicly traded, please identify:
    - i) The exchange(s) on which the company's securities are traded.
    - ii) any shareholders who hold 20% or more of the company's issued shares; and
    - iii) any shareholders who have a right to appoint or remove one or more Board Directors (such as under a shareholders agreement or similar).
- 7) Identify the company's officers and key employees (meaning those who are expected to play a material role in performing work in relation to the business of West Fraser) by providing the name, nationality, and year of birth for each.
- 8) Are any persons identified in questions 6), or 7) current or former Public Officials? If so, please identify each by name, title, and government entity, department or organization, date of appointment, and, if applicable, last day that such persons held the position of Government or Public Official.
- 9) Do any persons identified in questions 6), or 7) have a close family connection, or other personal, or professional affiliation with current or former Public Officials? If yes, please explain the relationship.
- 10) Does any government department, agency, or instrumentality, or any Public Official or employee of a government department, agency, or instrumentality, have a financial interest in the proceeds of the proposed contracts/business with West Fraser? If so, please describe the financial interest.

- 11) List two references who may be contacted for a business reference, if deemed necessary (ideally including a financial institution with whom you hold accounts).
- 12) Briefly describe the contemplated commercial terms and arrangements, including your proposed (i) payment mechanism (wire transfer, cash, etc.); (ii) location of payment receipt; (iii) material terms & conditions; and (iv) advance payments (if any).
- 13) Are you anticipating using any third-party agents/advisers in connection with your business with West Fraser (other than those already listed above)? If yes, please identify all third-party agents/advisers and explain the anticipated role of the third-party non-deal agents/advisors.

**Representative Certification**

I have completed the above Questionnaire and believe the answers provided above to be true and correct to the best of my knowledge and belief.

\_\_\_\_\_  
Name of Representative Completing Questionnaire

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**[West Fraser Personnel responsible for the relationship should affirm the following in relation to the information provided]:**

Based on my review of the information provided on the above Questionnaire, and any other Integrity Due Diligence conducted on the above Party, I certify that nothing has been brought to my attention that would cause me to believe that the Company's entry into a business relationship or transaction with the Party described above would violate applicable anti-corruption laws.]

\_\_\_\_\_  
Name of Designate

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date