

December 12, 2023

## **SUPPLIER CODE OF CONDUCT**

### **Introduction and Scope**

This Supplier Code of Conduct (“Code”) sets out the minimum requirements that West Fraser Timber Co. Ltd., its subsidiaries and affiliates (collectively referred to herein as “West Fraser”) expects its suppliers to meet including labour and human rights, health and safety, environmental responsibility, business integrity, supplier diversity, privacy and cyber security, in connection with any business directly or indirectly involving West Fraser. At West Fraser, we strive to partner with suppliers that have a strong commitment to our values and stated policy commitments.

This Code is aligned with [the United Nations \(UN\) Global Compact ten universally accepted principles](#), and other internationally recognized standards. This Code also reflects our commitment to support the UN’s Sustainable Development Goals which address the world’s most significant development challenges.

Suppliers must read, understand and ensure that their business and supply chain meet these standards.

Suppliers must also communicate this Code to related entities, their own suppliers and subcontractors who support them in supplying to West Fraser, so that they are aware of, understand and comply with this Code.

Suppliers’ ability to meet or exceed standards detailed in this Code will be an important consideration for procurement decisions. This Code does not preclude West Fraser from including additional social, environmental, ethical, privacy or cyber security requirements into procurement contracts to address specific risks associated with a transaction or business relationship.

In this Code, “supplier” means any individual or entity (including consultants and channel partners) that supplies goods or services to West Fraser or its related companies anywhere in the world. In

this Code, “workers” refer to employees, contractors, agencies, migrants, students and temporary staff of the supplier and of its related entities.

## **Requirements**

### **1. Compliance with Laws**

Suppliers must comply with the law in all countries where they operate.

### **2. Labour and Human Rights**

At West Fraser, we respect and support human rights. This includes the ten principles of the UN Global Compact, which are in line with the UN Guiding Principles on Business and Human Rights and that includes the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work (ILO). We expect suppliers to respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

Should suppliers become aware of an incident within their company or supply chain, which is in breach of this Code, they must disclose this breach to West Fraser.

### **3. Bullying, Harassment and Disciplinary Practices**

Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment, or sexual abuse, and harsh or inhumane treatment are prohibited. West Fraser and its work environments are to be free of violence, bullying and harassment in all forms.

### **4. Freedom of Association**

Suppliers must respect workers’ freedom of association, recognize, and protect their right to collective bargaining and to form, join and administer workers’ organizations.

Suppliers must protect against acts of interference with the establishment, function, or administration of workers’ organizations in accordance with applicable laws. Where the right to freedom of association and collective bargaining is restricted under the law, suppliers must allow workers to freely elect their own representatives.

## **5. Working Hours**

Must comply with local laws regarding worker's hours.

## **6. Wages and Benefits**

Suppliers must comply with applicable laws relating to wages and benefits (including minimum wage, overtime pay, and piece rates). Suppliers must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner, which will be within the limits of the local law.

## **7. Forced and Compulsory Labour**

Suppliers must not use any form of forced, bonded, indentured, compulsory or prison labour, slavery, or human trafficking in any part of their business operations. Involuntary labour includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to persons having control over other persons.

## **8. Child and Underage Labour**

Child labour is strictly prohibited. Suppliers must implement appropriate mechanisms to verify the age of suppliers' workers are in accordance with applicable law.

## **9. Health and Safety**

Our suppliers play a significant role in our business and our commitment to keep each other, our customers, and communities safe, secure, and well. Suppliers must identify and comply with relevant workplace and product health and safety laws and ensure their workers understand and follow health and safety policies, standards, and procedures that apply to their work. Suppliers must provide a safe and healthy workplace for their workers and anyone that could be impacted by their activities. As a minimum, suppliers must:

- Take reasonable steps to identify workplace hazards and minimize the risk of workplace injury, illness and disease for workers;
- Provide appropriate equipment, resources, instruction, education, and training for workers to safely carry out their duties, including personal protective equipment; and,

- Implement effective systems to ensure the delivery of products and services meet relevant standards and legislative requirements, and safety considerations are taken into account throughout the product life cycle.

Suppliers must prepare for, respond to, manage, and report workplace incidents, injuries, and emergencies, providing medical assistance to impacted parties as required.

Suppliers must have systems, training, and emergency equipment in place to effectively respond to and manage incidents and emergencies. Emergency drills must be conducted at least annually or as required by local law, whichever is more stringent.

## **10. Supplier Diversity**

West Fraser values diversity, equity and inclusion as stated in its [Diversity, Equity and Inclusion Policy](#). Diversity includes unique and valued attributes related to gender, age, cultural background, disability, religion, and sexual orientation, as well as differences in perspective and life experience, interpersonal and problem-solving skills. It is expected that suppliers will make efforts to advance and promote diversity, equity, and inclusive behaviours, aligning with our policy and commitments.

## **11. Environmental Responsibility**

Suppliers should strive to adopt sustainable business and operating practices, including responsible product sourcing, conservation of resources, and minimize overall impacts related to land, air, water, and soil. At minimum, suppliers must minimize the adverse environmental impacts of their operations, products, and services and comply with West Fraser's [Environmental Policy](#) and applicable West Fraser environmental management system requirements.

## **12. Environmental Laws & Permits and Reporting**

Suppliers must comply with applicable environmental laws, standards, and notices from regulators. Suppliers must obtain, maintain, keep current and comply with necessary environmental permits, approvals, and registrations.

## **13. Business Integrity**

Suppliers must act ethically and be honest, transparent, and trustworthy in all their dealings with others.

#### **14. Conflicts of Interest**

Suppliers must avoid actual, potential, or perceived conflicts of interest with West Fraser employees. If potential or actual conflicts of interest exist, they must be disclosed to ensure appropriate steps are taken to manage the conflict.

#### **15. Bribery and Corruption**

Suppliers must comply with applicable anti-bribery and anti-corruption laws and with the standards set by West Fraser's Anti-Bribery and Anti-Corruption Policy. Suppliers must also have adequate policies and procedures in place to monitor compliance with such laws and standards.

#### **16. Intellectual Property and Fair Competition**

Suppliers must respect the intellectual property rights of West Fraser and other third parties. Any transfer of technology and knowledge must be handled in a manner that protects intellectual property rights.

Suppliers must conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws. Falsification of records or misrepresentation of conditions or practices is unacceptable.

#### **17. Document and Records**

Suppliers shall maintain appropriate documents and records to support their performance in meeting these requirements for West Fraser. Document control, including record retention, shall comply with all applicable legal and regulatory requirements.

#### **18. Training and Communication**

Supplier shall implement or maintain processes for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers and sub-contractors related to this policy.

## **19. Audit & Reporting of Violations**

West Fraser may at any time review or audit a supplier's compliance with this Code. In such an event, the supplier must co-operate by providing information, documents, and access to staff as West Fraser reasonably requires.

## **20. Continuous Improvement**

Suppliers are encouraged to go beyond compliance with applicable laws and take responsibility to continually improve social and environmental conditions and ethical behaviour.

## **21. Whistleblowing**

Suppliers must provide workers, their suppliers, and members of the community in which they operate in or provide services to with a confidential means to report violations of this Code.

West Fraser's confidential and anonymous whistleblowing service can be accessed either by:

- leaving a voice report with West Fraser'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
- 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.

## **22. External Communications**

Suppliers must obtain prior written permission from West Fraser before publicly discussing, endorsing, reviewing, referencing, or otherwise commenting on WF's businesses, products, services, relationships, programs, or brand.

## **23. Information Privacy**

Suppliers shall collect, use, disclose and retain information in accordance with applicable privacy law.

## **24. Cyber Security Risk Management**

Suppliers must implement processes to identify and manage emerging and evolving cyber security risks. This must include reviews at least annually to develop, update and/or implement procedures and policies to prevent, detect and respond to all cyber security risks. Suppliers must make best efforts to minimize the risks of cyber security incidents that affect the products and/or services provided to West Fraser.