

CENTURION L U M B E R

Fighting The Forced Labour and Child Labour in Supply Chains Statement and Policy

Introduction

This Policy and Statement sets out Centurion Lumber's actions to understand the potential forced labour risks related to its business and to put in place steps that are aimed at ensuring there is no forced labour or child labour in its business or its supply chain.

Centurion Lumber Ltd. (BN 10089 5069) fully supports the aims of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) and makes this statement as a single reporting entity in accordance with Section 11 of the Act. Our organization is absolutely committed to preventing forced and child labour in our corporate activities, and to ensuring that its supply chains are free from these issues.

This report addresses each of the requirements included in section 11 of the Act as it relates to actions and activities during the 2023 fiscal year.

Organizational Structure

This statement covers the activities of Centurion Lumber Ltd., a wholesale lumber and wood products Corporation. Established in 1968, in Chemainus, BC, Centurion Lumber is a third-generation family run business that markets a wide variety of building and specialty lumber products.

Countries of Operation and Supply

Centurion Lumber currently operates in Canada and the United States. Alongside Canadian lumber, Centurion imports from Europe and the United States to supply North American and Asian markets. We also sell plywood, veneer, oriented strand board and wood mats to Canadian and United States customers. All of these products are produced in facilities or suppliers with whom we have long-standing relationships.

The following is the process by which the Company assesses whether or not particular activities or countries are high risk in relation to forced and child labour.

Although forced and child labour can be found in all countries, there are certain countries associated with a higher risk. According to the Global Slavery Index and indices related to forced labour and child labour, Centurion Lumber does not have any activities or operations in countries assessed as high-risk. We import lumber only from countries with the strongest responses to modern slavery. Our products are not on the List of Goods Produced by Child Labor or Forced Labor, compiled by the Bureau of International Labor Affairs as of September 28, 2022. Our products have not been identified as inputs used in the production of downstream goods at risk. Centurion Lumber will continue to monitor any changes or developments in risk factors.

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Responsibility

Responsibility for our prevention and reduction of forced labour initiatives is as follows:

- **Policies:** Our policies communicate our organization's values and standards, making it clear that we do not tolerate any level of human right violations including forced labour and child labour. We are committed to continuously improving our approach to reflect our commitment to acting ethically in all business relationships.
- **Risk Assessment:** Assessing and understanding risks is a critical step in ensuring that our operations prevent and address the issue. Centurion Lumber conducts internal analysis and assessments at a global level to help identify any potential risks of human rights violations across the entirety of our business operations.
- **Due Diligence:** Our human resources and compliance teams are responsible for the due diligence of assessing and mitigating our risk factors. Investigations in relation to known or suspected instances of forced or child labour would be carried out by our legal team.

Relevant Policies

- **Code of Conduct.** Our code makes clear to employees the actions and behaviour expected of them when representing our organization. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating domestically and abroad and managing its supply chain. It's expected that all individuals working for or under Centurion Lumber Ltd. comply with the code.
- **Respectful Workplace policy.** Our respectful workplace policy is an extension of our code of conduct and ethics dedicated to ensuring that Centurion Lumber presents a supportive, respectful, and safe work environment free of bullying, harassment, discrimination, and violence. We are committed to treating our employees, contractors, customers, and partners with respect, dignity, and in accordance with all applicable legislation.
- **Whistleblowing policy.** We encourage all our employees, customers, and other business partners to report any concerns related to the direct activities, or the vendors and suppliers, of our organization. This includes any circumstances that may give rise to an enhanced risk or forced or child labour.

Due Diligence

We undertake due diligence when taking on new suppliers, as well as employee related processes. Our due diligence and reviews include:

- Evaluating the forced and labour risks of each new supplier.
- Verifying that all individuals are eligible to work at Centurion Lumber Ltd. and meet all applicable age requirements during the pre-employment screening. Centurion Lumber follows all applicable wage and labour, laws and provides ethics and compliance training as part of the onboarding process.

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Looking Ahead

We have reviewed our objectives and have developed a strategy for future improvements including:

- Requiring all employees to complete training on assessing and identifying risks of forced labour and child labour in relation to various aspects of the business, and what steps should be taken if it's suspected.
- Adding a Forced Labour and Child Labour section to our Code of Conduct that explains the following:
 - How to identify prevalent risk factors and indicators of forced and child labour
 - The obligation of all employees, contractors, customers, and partners to report acts of actual or suspected violations
- Improving our due diligence by requiring suppliers to provide a declaration as supporting evidence of their compliance with our standards.
- Maintaining a continuous review system of all products and suppliers and assessing its effectiveness in ensuring that forced labour and child labour are not being used in our business or supply chains.



Employee Code of Conduct

Introduction

This Employee Code of Conduct outlines our expectations for all employees regarding their behavior and responsibilities while working at our organization. It is important that employees understand and adhere to these guidelines to maintain a positive and productive work environment.

Professionalism

All employees are expected to conduct themselves professionally at all times. This includes treating colleagues, clients, and customers with respect, maintaining a neat and appropriate appearance, and acting in a manner that reflects positively on the organization.

Confidentiality

Employees must respect the confidentiality of sensitive information they have access to during their employment. This includes, but is not limited to, customer data, financial information, trade secrets, and intellectual property. Any unauthorized disclosure or use of confidential information is strictly prohibited.

Conflict of Interest

Employees should avoid situations that create a conflict of interest between their personal interests and the interests of the organization. If a conflict arises, employees must disclose it promptly to their supervisor or the appropriate department.

Human Rights, Anti-Discrimination and Harassment

Centurion Lumber affirms its commitment to human rights and the continual improvement of its human rights standards and practices. We are committed to providing a workplace free from discrimination, harassment, and retaliation. Employees must treat others with fairness, respect their diversity, and refrain from engaging in any form of discriminatory or harassing behavior based on race, color, religion, gender, sexual orientation, age, disability, or any other protected characteristic. If you have any concerns of this nature, please refer to our Workplace Bullying and Harassment Policy.

Use of Company Resources

All company resources, including equipment, technology, and facilities, should be used responsibly and for legitimate business purposes only. Personal use of company resources should be minimal and in compliance with applicable policies.

Compliance with Laws and Regulations

Centurion Lumber Ltd. is committed to conducting all its activities in compliance with applicable laws and regulations. All workers including permanent, temporary, casual, student, and contractors are expected to comply fully with the letter and spirit of the laws that govern us.

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PO BOX 480, CHEMAINUS, BC V0R 1K0
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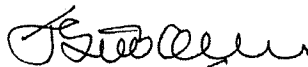
May 28, 2024

Letter of Attestation for Fighting Against Forced Labour and Child Labour in Canadian
Supply Chains Reporting Year 2023

To Whom It May Concern:

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Sincerely,



Jerry G. Doman
President

I have the authority to bind Centurion Lumber Ltd.

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Sincerely,



Ronnie D. Doman

Secretary

I have the authority to bind Centurion Lumber Ltd.