

# Forced and Child Labour Statement



Glatfelter Gatineau Ltée. (“Glatfelter Gatineau”) operations have taken steps to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business.

This report (the “Report”) has been prepared pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and sets out the steps that Glatfelter Gatineau has taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business. This statement is in respect of our financial year ended 31st December 2023 and was approved by the Board of Directors in May 2024.

## What is modern slavery?

Modern slavery is an international crime, affecting millions of people around the world - a growing global issue that transcends age, gender and ethnicities. Sadly, vulnerable people from around the world are forced to work illegally against their will. Modern slavery can take many forms, with forced labour and child labour being the most common. Therefore, businesses clearly have a key role to play in addressing the risks associated with forced labour and child labour.

## Our organization structure and supply chains

Glatfelter Gatineau is a subsidiary of Glatfelter Corporation, which trades on the New York Stock Exchange under the ticker symbol GLT and is headquartered in Charlotte, North Carolina, USA. It, and its affiliates (together “Glatfelter”) have operations across the Americas, Europe and Asia, including in Canada through Glatfelter Gatineau. Glatfelter Gatineau is headquartered in Gatineau, Quebec., Canada.

Glatfelter Gatineau is a leading supplier of engineered materials. Our production processes and those of our main suppliers are highly automated, run by highly skilled technical personnel. Glatfelter’s global procurement group in Switzerland will negotiate the majority of Glatfelter Gatineau’s procurement, although some procurement occurs locally.

## Our policies and practices in relation to slavery and human trafficking

Glatfelter has a zero-tolerance approach to violations to the anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation.

Glatfelter’s Core Values of Integrity, Financial Discipline, Mutual Respect, Customer Focus, Environmental Responsibility and Social Responsibility are the pillars of our company culture. These Core Values embody everything that we do, and how we do business. They outline the expectation of our people’s behaviour and interactions with colleagues, customers, vendors and people around the world.

We seek to treat everyone fairly and consistently at Glatfelter, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to modern slavery are in line with our culture and Core Values.

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## Our specific policies to address modern slavery risk include:

- An “Anti-Slavery & Human Trafficking Statement” setting forth policies and practices and due diligence processes in these areas.
- Our Code of Business Conduct (the “Code:”) connects our Core Values to the choices we make, ensuring we conduct our business legally, ethically, and responsibly.
- We offer multiple options for Glatfelter employees and partners to report concerns or ask questions on anything that appears to violate the law, our Core Values, or the Code. This includes the Integrity Helpline, which can be accessed by phone, website URL or QR code. The Integrity Helpline is free, confidential and untraced. Concerns and questions can also be raised to the Legal team, the Board of Directors’ Audit Committee Chair, any senior leader of Human Resources or an employee’s manager. Glatfelter will promptly, objectively, and thoroughly investigate all reports and will take action to correct the situation, as appropriate.
- Robust recruitment processes in line with relevant employment laws.
- Wellbeing strategy and initiatives to support our people’s physical and mental wellbeing.
- A Supplier Code of Conduct sets out our global expectations for our business partners with respect to how they conduct business with us and on our behalf; this includes a strict prohibition that suppliers must not use any forced labour or exploitative working conditions. Furthermore, based on the child and forced labour principles of the International Labor Organization conventions, suppliers are expected to restrict employment to those aged 15 or older or the local minimum employment age or the mandatory school age, whichever is higher.
- Our Human Rights Policy covering a range of topics, such as safety and health, labour standards and prohibition of forced labour and child labour, diversity and equal opportunity, and access to safe drinking water.
- A Statement of Principles on Child Labor and Forced Labor.

## Due diligence processes, risk assessment and management

The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with our Supplier Code of Conduct (which is available on our website), which was updated in 2022. In addition, our suppliers are also subject to Glatfelter’s Human Rights Policy; should we have concerns of noncompliance, we would take action to address them with requests for performance improvement, or we would elect not to do business with that customer or supplier.

## Key performance indicators to measure effectiveness of steps being taken and remediation efforts

We log complaints received via our Integrity Helpline system or through other sources, together with the actions taken. To the date of this statement, Glatfelter has had no identified instances of modern slavery and has, therefore, not taken any remediation measures. If we identify any instances of child or forced labour we will work to put in place appropriate remediation measures.

Glatfelter has also incorporated our Environmental, Social and Governance & Ethics (“ESG”) responsibilities into our organization structure with a refreshed approach to reporting and multi-year goals.

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## Training on modern slavery and trafficking

Glatfelter employees, officers, agents, and directors receive periodic training on the contents and importance of the Code and related policies and are asked to certify they are in full compliance with, and will uphold, the Code and related policy statements.

All salaried employees, including the management team, are required to complete quarterly compliance and ethics training and pass a test with at least an 80% score or fulfill certain other requirements to demonstrate their understanding of the training topics and compliance with Glatfelter's expectations.

Our Human Resources team, which is responsible for recruitment, maintain up-to-date knowledge and awareness of modern-day slavery to ensure that our recruitment and screening practices are fit for purpose. The Human Resources team undertakes checks that all employees can demonstrate their eligibility to work freely.

The Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Glatfelter Gatineau Ltée.

In my capacity as a Director of Glatfelter Gatineau Ltée, and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

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. I have the authority to bind Glatfelter Gatineau Ltée.

Signed,

Handwritten signature of Patricia A. Sargeant in blue ink.

Patricia Sargeant

14/05/24

Handwritten signature of Paul Wolfram in blue ink.

Paul Wolfram

14/05/24

Handwritten signature of Jean-Francois Cartie in blue ink.

Jean-Francois Cartie (May 14, 2024 13:25 EDT)

Jean-Francois Cartie

14/05/24











# Forced and Child Labour Statement (Canada) 5-14-2024

Final Audit Report

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