



Forced Labor and Child Labor in Canadian Supply Chains Report 2024

As required by the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”), Hampton Lumber Mills – Canada, Ltd. (“Hampton”) submits this joint Forced Labor and Child Labor in Supply Chains Report 2024 (“the Report”) on behalf of itself and two subsidiaries, namely:

Hampton Lumber Mills – Canada, Ltd.
9600 SW Barnes Road Suite 200
Portland, Oregon 97225
USA

TRAPA Forest Products Ltd. (“TRAPA”) (BC0940926)
#368 – 13091 Vanier Place
Richmond, BC V6V 2J1
Canada

Babine Forest Products Ltd. (“Babine”) (BC0122477)
19479 Highway 16 East
Burns Lake, BC V0J 1E0+
Canada

The Report covers the reporting year of 2024. To date, this is the only report filed for these entities and is not a revised version of a previously filed report. The Report is submitted on December 31, 2024. The terms “we” and “our” refer to all entities listed above.

Entity Details

Hampton is the owner of TRAPA and Babine. TRAPA and Babine meet the two following thresholds, thus meeting the definition of “entity” under the Act:

- Have at least \$20 million in assets for at least one of its two most recent financial years AND
- Have generated at least \$40 million in revenue for at least one of its two most recent financial years.

Hampton is headquartered in Portland, Oregon, USA, and is the ownership entity for its Canadian operations. Hampton does business in Canada and has assets in Canada. Both TRAPA and Babine are headquartered in British Columbia, Canada, and operate in the forestry industry. TRAPA is a reseller and importer of wood products, and Babine is a manufacturer of wood products. Both companies have their place of business in Canada, do business in Canada, and have assets in Canada.

We are not subject to reporting requirements under supply chain legislation in another jurisdiction.

Commitment to Ethical Business Practices

We are firmly committed to ethical business practices. We are managed by a Board of Directors and executive and senior leadership teams. The Board and management set the policies and practices. As such, we have a firm Business Ethics Policy in which employees are held to high standards of honesty and integrity. Furthermore, our Global Anti-Corruption Policy prohibits any form of bribe or unethical practices with vendors. These policies reflect our values of conducting business in an ethical and legal manner and respecting the communities in which we live.

Supply Chain

We take steps to ensure that its vendors also meet our standards for ethical business practices. Such due diligence steps may include requiring suppliers to complete questionnaires, verification of information, credit review, on-site audits, and independent review.

As part of our commitment to ethical and sustainable forestry business practices, TRAPA and Babine are PEFC Chain of Custody certified. PEFC is a third-party certification standard for sustainable, ethical forest practices and trading. As required by the PEFC standard, we have affirmed their commitment to not purchase materials that come from forced and/or child labor. In addition to sourcing a significant percentage of raw materials from our forest lands, the majority of Babine's outside vendors are PEFC-certified. TRAPA also regularly purchases products from PEFC-certified vendors or vendors with a similar third-party certification.

Risk Exposure

We have conducted internal assessments of the risks of forced labor and/or child labor in activities and supply chains and concluded that there is no evidence of such. Therefore, no mitigation or remediation measures have been taken.

We will continue to strive to identify emerging risks. In the event that we learn of any allegations of forced labor and/or child labor in our activities and supply chains, we will take appropriate steps to further investigate.

Training and Awareness

Our policies are enforced by our senior management. In order to ensure compliance with these policies, we provide regular training to employees on policies and appropriate practices. This training also includes training on labor issues, including forced labor and child labor, in supply chains.

Effectiveness

Our Board of Directors affirms its commitment to not purchasing products that come from forced and/or child labor. The Board and management regularly review policies and procedures to ensure that our business practices align with our ethical standards. All employees are encouraged to report any suspected policy violations to management.

Attestation

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 Hampton Lumber Mills – Canada, Ltd., TRAPA Forest Products Ltd., and Babine Forest Products Ltd. 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.

Chris Walton, Chief Financial Officer

By signing below, I affirm that I have the authority to bind Hampton Lumber Mills – Canada, Ltd. and its subsidiaries.

Signature: _____

