



**Legislation:** *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

**Reporting Year:** 1

**Period:** January 1, 2024 – December 31, 2024

**Accountable Signing Authority:** Kent Ramsay, President

**Date of Submission:** May 31, 2024

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## Company Overview

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Canadian Act”), this statement outlines the measures implemented by Thunder Bay Pulp & Paper Inc. to address the risks of modern slavery, including but not limited to forced and child labour<sup>1</sup> within our operations and supply chain.

This submission is solely for Thunder Bay Pulp & Paper Inc. that represents one legal entity operating one facility located at 2001 Neebing Avenue, Thunder Bay ON P7E 6S3.

At Thunder Bay Pulp & Paper Inc., we actively uphold human rights and work to prevent any violation of others’ human rights through the policies and procedures we have established. The relevant policies that exist are as follows:

- Code of Business Conduct
- Human Rights Policy
- Ethics Reporting Policy
- Indigenous Peoples Policy
- Health & Safety Policy
- Health & Safety Code of Conduct
- Workplace Violence, Domestic Violence & Harassment Policy
- Environmental Policy
- Disconnecting from Work Policy
- Procurement Policy
- Guidelines for Suppliers

We are committed to establishing safe, inclusive, and respectful work environments wherever we conduct business. We value the fundamental rights of our employees and all who work within our supply chain, which encompass freedom from slavery and child labour, equal opportunities for all, a safe and healthy workplace, and freedom from discrimination and harassment.

Thunder Bay Pulp & Paper Inc. continues to develop and expand our understanding of the risks associated with the complex issue of modern slavery and to identify areas within our operations and broader supply chain that may be impacted by such challenges. We collaborate across our business and supply chain to implement appropriate practices that mitigate and address potential risks.

Modern slavery is completely unacceptable within our organization and supply chains. Thunder Bay Pulp & Paper Inc. acknowledges our responsibility to uphold the rights of individuals working for our organization, as well as those associated with suppliers and business partners who prioritize human rights for their own employees. Recognizing that human rights issues require multifaceted approaches, we consider it crucial to engage with all stakeholders to promote awareness and foster understanding.

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<sup>1</sup> As these terms are defined pursuant to section 2 of the Canadian Act.

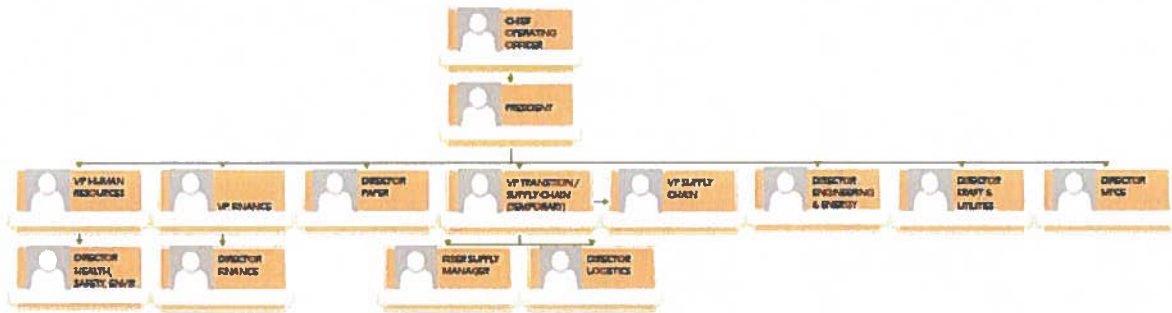
## Part I – Structure, Operations and Supply Chains

### Our Structure

Thunder Bay Pulp & Paper Inc. is a subsidiary of Atlas Holdings, LLC.

Thunder Bay Pulp & Paper Inc. receives wood chips from various sources and converts those chips into pulp and paper for the commercial market.

Thunder Bay Pulp & Paper’s organizational structure is as follows:



Thunder Bay Pulp & Paper Inc. (the reporting entity) is an entity in accordance with the Canadian Act due to the following:

- it has assets that exceed \$20 million CAN\$, as of December 31, 2023;
- it has Sales Revenue exceeded \$150 Million in CAN\$ in 2023; and
- as of December 31, 2023, employed more than 300 people in Canada.

### Our Canadian Operations

Thunder Bay Pulp & Paper Inc. is a leading northern bleached softwood kraft and northern bleached hardwood kraft, paper, newsprint and directory producer. Located on Lake Superior, the Thunder Bay mill has been a landmark company of northwestern Ontario since 1924. In August 2023, Atlas Holdings LLC established Thunder Bay Pulp & Paper Inc. as an independent pulp and paper operation, joining Atlas’ global family of manufacturing and distribution businesses.

The Canadian Business Number for Thunder Bay Pulp & Paper Inc. is 102381548.

### Our Supply Chains

The facility purchases raw forest products and material / equipment needed for the manufacturing process primarily from Canadian sources. The raw forest products come from local harvesting in and around the Thunder Bay area. The material / equipment is generally sourced from within Canada.

## Part II – Policies and Due Diligence Processes

Thunder Bay Pulp & Paper Inc. has in place a robust set of policies, codes, and procedures addressing its obligations to treat our team members, clients and suppliers with the highest possible

level of dignity and respect, as well as our expectations that our contractors, vendors, and suppliers do the same. These documents are:

- Code of Business Conduct
- Supply Chain Code of Conduct
- Human Rights Policy
- Ethics Reporting Policy
- Indigenous Peoples Policy
- Health & Safety Policy
- Health & Safety Code of Conduct
- Workplace Violence, Domestic Violence & Harassment Policy
- Environmental Policy
- Disconnecting from Work Policy
- Procurement Policy
- Guidelines for Suppliers

In addition, Thunder Bay Pulp & Paper Inc. has put in place a new policy specifically to address the complex problems of forced labour, child labour, human trafficking, and modern slavery. The document is as follows:

- Policy against Forced Labour, Child Labour, Human Trafficking and Modern Slavery

Our policies and practices are guided by international and industry-leading standards, such as:

- UN Global Compact
- International Bill of Human Rights
- ILO Declaration on Fundamental Principles and Rights to Work
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights

Thunder Bay Pulp & Paper Inc. further requires its suppliers to adhere to its Supplier Code of Conduct, which aligns with the Code of Business Conduct and applies to all employees. Thunder Bay Pulp & Paper Inc. supports the goals of the Canadian Act and takes seriously our responsibility to act with due diligence to avoid infringing on the human rights of others and address any impact on human rights if they occur.

### **Code of Business Conduct**

Thunder Bay Pulp and Paper Inc.'s Code of Business Conduct establishes the fundamental ethical values and standards of behavior that we are expected to demonstrate in all our work and business activities. As you would expect, this Code cannot address every possible situation we encounter in our daily activities, but it does provide the basic rules and guidelines for ethical conduct and compliance based on our core values.

While this Code sometimes refers to "employees", it applies to all employees, officers and directors of Thunder Bay Pulp and Paper Inc., including anyone who works for the Company, at any level whether on a full-time, part-time, contractual, seasonal, temporary, or other basis.

## **Human Right Policy**

At Thunder Bay Pulp and Paper Inc., our purpose is that each of our constituencies – employees, customers, investors, and the communities in which we operate – are respected and enriched through their engagement with us.

Our vision is to enrich our organization through diversity, refuse to tolerate any form of discrimination, and create a culture where employees operate safely each day, without compromise, and watch over each other.

Thunder Bay Pulp and Paper Inc. shares the United Nations' (UN) vision for a more inclusive, peaceful and prosperous future. We recognize the importance of protecting human rights and our purpose and vision are informed by the internationally recognized principles set out in the International Bill of Human Rights as well as the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Our commitment to the UN's Sustainable Development Goals (SDGs) positions us to be a more efficient and competitive company, a better employer, a stronger business partner, and even more deeply engaged in the communities in which we live and work. The SDGs are a call for action to promote prosperity while protecting the planet. They recognize that ending poverty goes hand-in-hand with strategies that build economic growth and address a range of social needs including education, health, social protection, and job opportunities, while tackling climate change and environmental protection.

## **Ethics Reporting Policy**

It is essential to our company's success that we each comply with our Code of Business Conduct which establishes the fundamental ethical values and standards of behaviour that we are expected to demonstrate in all our work and business activities. Business results should never be achieved at the expense of unethical conduct or non-compliance.

This Ethics Reporting Policy is an important complement to our Code of Business Conduct. It confirms that each one of us has a duty to raise and report our questions, complaints and concerns relating to the application or potential or suspected breaches of the law, the Code of Business Conduct, this policy, or other applicable policies and procedures dealing with ethics and compliance. This policy also provides details on the process for raising and reporting concerns about any ethical issues as well as information on how concerns will be handled.

## **Indigenous People Policy**

Thunder Bay Pulp and Paper Inc. recognizes and respects the cultural and social significance of the land, water and forests of Canada to Indigenous peoples. We also understand these resources are critical to the future prosperity and economic sustainability of Indigenous communities. We share a common interest in ensuring that the forests we rely upon continue to provide for cultural, environmental and economic needs of future generations.

Thunder Bay Pulp and Paper Inc. is committed to support and maintain constructive relationships with Indigenous peoples in our operating region and to explore employment and business development opportunities of mutual benefit.

## **Health & Safety Policy and Health & Safety Code of Conduct**

At Thunder Bay Pulp and Paper Inc., we believe that no part of our operation is more important than preventing occupational injuries and illnesses. Our most important overall company objective is to ensure the occupational health, safety and welfare of our employees, visitors and others who may be affected by our undertakings.

At Thunder Bay Pulp and Paper Inc., we are committed to maintaining safe and healthy working conditions at all times and to integrate safety and health measures into each task so they become embedded in our overall operations.

### **Workplace Violence, Domestic Violence & Harassment Policy**

At Thunder Bay Pulp and Paper Inc., it is our policy to maintain a professional working environment for all employees, free of any form of violence and/or harassment and/or workplace sexual harassment against any employee by anyone, including co-workers, supervisors, executives, officers, directors, vendors, contractors, clients, customers, or agents. Workplace violence, threats of workplace violence or workplace harassment, and workplace sexual harassment are contrary to the Ontario *Occupational Health and Safety Act* and will not be tolerated.

Everyone is responsible for helping ensure that our work environment, either on or off premises, is free from violence and/or harassment and/or workplace sexual harassment. Everyone is expected to avoid any behaviour or conduct that could reasonably be interpreted as violence and/or harassment and/or workplace sexual harassment.

Thunder Bay Pulp and Paper Inc. firmly believes that every employee is entitled to be treated with respect. This policy aims to prevent and put an end to situations of violence and/or harassment and/or workplace sexual harassment and provide support to persons who feel they are victims of violence and/or harassment and/or workplace sexual harassment.

### **Environmental Policy**

Sustainability and environmental stewardship are top priorities at Thunder Bay Pulp and Paper Inc. We believe that the long-term viability of our company and the community in which we operate depends on managing environmentally significant aspects from our site as well as the overall performance of our operation.

At Thunder Bay Pulp and Paper Inc., we are committed to meeting or exceeding all applicable legal and other regulatory compliance requirements.

### **Disconnecting from Work Policy**

The health and wellbeing of our employees is very important, and we, as a company, encourage and support our employees in prioritizing their own wellbeing. Disconnecting from work is vital for a person's wellbeing as well as sustaining a good work-life balance.

All employees are encouraged to conduct their assigned work within their working hours, to the extent it is reasonably possible to do so.

### **Procurement Policy**

By developing a regional supply chain, Thunder Bay Pulp and Paper Inc.'s objective is to obtain goods and services at the best possible value, taking into account quality, price, and support and services, while encouraging the growth and development of regionally based and citizen-owned companies in the procurement of such goods and services.

The ultimate goal is to create efficiencies in our supply chain and to ensure reliable access to critical suppliers and service providers by building a critical mass within our operating region.

### **Guidelines for Suppliers**

At Thunder Bay Pulp and Paper Inc., we value our relationships with our customers, suppliers, fellow employees, the communities in which we do business and our shareholders. To maintain these relationships, it is imperative that all our business be conducted with absolute integrity in an atmosphere of candor and good faith. Compliance with the law is a given. Our aims are considerably higher. These Guidelines set out the principles and standards applicable to each supplier that wishes to establish or maintain a commercial relationship with Thunder Bay Pulp and Paper Inc. will not knowingly do business with any persons or entities that operate in violation of any applicable laws and regulations. Thunder Bay Pulp and Paper Inc. confirms its intention to do business solely with suppliers who demonstrate high standards of business integrity and ethical conduct. We therefore take steps to ensure that our suppliers understand the standards we apply to ourselves and that we expect from them.

Our Guidelines apply to Thunder Bay Pulp and Paper Inc.'s direct suppliers, such as individuals and entities providing products or services to Thunder Bay Pulp and Paper Inc., as well as to any consultant, employee, agent or intermediary acting on behalf of any such supplier. These direct suppliers shall ensure that their respective suppliers and subcontractors comply with these Guidelines.

Our Guidelines apply to all current or potential suppliers in the context of commercial and contractual negotiations and agreements with Thunder Bay Pulp and Paper Inc. and/or any of its subsidiaries and affiliates.

### **Our Due Diligence Processes**

Thunder Bay Pulp & Paper Inc. has implemented a number of due diligence measures, to ensure layers of review. As described in our policies, our standard terms of engagement/contracts with suppliers include clauses that require the suppliers to abide by our Policy against Forced Labour, Child Labour, Human Trafficking and Modern Slavery, conduct due diligence relevant to the possibility and risks of forced labour and child labour, and specify that breaches of the same will be grounds to terminate the contract, with damages to us.

In addition, we intend to implement a new practice of distributing an annual or semi-annual questionnaire to all of our suppliers, to ascertain their risks and due diligence practices regarding forced labour and child labour. In this questionnaire, each supplier's structure, their supply chain, their employees, policies and procedures, history, and general awareness regarding forced labour and child labour in their organization or supply chain.

### **Part III – Risks of Forced Labour and Child Labour in Operations and Supply Chains**

Our potential exposures to indirect association of modern slavery practices is limited given the local sourcing of raw forest product and material / equipment.

However, we expect all suppliers, regardless of the cultural, social and economic context, to meet expectations of fundamental rights for all people. This means treating their employees with fairness, respect and dignity, and following practices that protect health and safety for the people working for them.



Thunder Bay Pulp & Paper Inc. assesses low to minimal risk of forced labour or child labour in our supply chain. Thunder Bay Pulp & Paper Inc. is not aware of any forced labour or child labour in our supply chain. Both statements are subject to the limitations of Thunder Bay Pulp & Paper Inc. risk identification activities as described in more detail above and below.

#### **Part IV – Measures to Remedy Forced Labour and Child Labour**

Thunder Bay Pulp & Paper Inc. is not aware of any incidents of forced labour or child labour in our activities or supply chain in our past financial year, subject to the limitations of our risk identification activities as described in more detail above and below. Accordingly, Thunder Bay Pulp & Paper Inc. has not had to take any remedial measures in response to incidents of forced labour or child labour.

Should such a risk materialize, Thunder Bay Pulp & Paper Inc. will follow the policies and processes described above and below to ensure that it is holding the appropriate party responsible and remedying the said risks.

#### **Part V – Measures to Remediate the Loss of Income to those Impacted by the Elimination of Forced Labour and Child Labour**

Thunder Bay Pulp & Paper Inc. has not as of the date of this report become aware of any loss of income to vulnerable families resulting from our measures to eliminate the use of forced labour and child labour in our activities and supply chains.

#### **Part VI – Training Provided to Employees**

Thunder Bay Pulp & Paper Inc. develops annual training plans and has included Mandatory Training for all Managers (Senior and Operations Team), Purchasing Department Staff. This training includes an annual review of the policies below and orientation supported by a sign off from the trainees.

- Code of Business Conduct
- Human Rights Policy
- Ethics Reporting Policy
- Indigenous Peoples Policy
- Health & Safety Policy
- Health & Safety Code of Conduct
- Workplace Violence, Domestic Violence & Harassment Policy
- Environmental Policy
- Disconnecting from Work Policy
- Procurement Policy
- Guidelines for Suppliers

Optional internal or external training will be made available for awareness of international child labour, forced labour, human trafficking, and modern slavery. The training may include identification, risk assessment and mitigation.

**Part VII – Assessing Effectiveness of Actions against Forced Labour and Child Labour**

Thunder Bay Pulp & Paper Inc. has not taken any actions to assess the effectiveness in preventing and reducing risks of forced and child labour in its activities and supply chains in the previous financial year. We are currently examining how best to conduct these assessments.

We recognize the need to implement effective measures to identify and mitigate the risk of forced and child labour within our operations and supply chains. We are currently examining how best to conduct these assessments.

We will review annually our reporting document and update as necessary to ensure that it reflects the emerging consensus on best practices to address these complex issues. We also will annually review our questionnaire with our suppliers, and process to ensure continued compliance and implement any improvements required to ensure we are accurately obtaining and retaining information from our external and indirect suppliers.

**Attestation**

In accordance with the requirements of the Canadian 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.

By signing the below, I hereby confirm I have the authority to bind Thunder Bay Pulp & Paper Inc.



Kent Ramsay

President – Thunder Bay Pulp & Paper Inc.

05-27-24

Date