



2024

Report

Fighting Against Forced Labour and Child Labour In Supply Chains



PRODUITS FORESTIERS
GREENFIRST
FOREST PRODUCTS

About this Report

This report constitutes the second annual report prepared by GreenFirst (as defined below) pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**").

This report is a joint report ("**Report**") submitted by GreenFirst Forest Products Inc. ("**GreenFirst**") on a consolidated basis, including all of its subsidiaries and the following entities: GreenFirst Forest Products (Ontario) Inc., and GreenFirst Forest Products (QC) Inc. (collectively with GreenFirst, the "**Company**") for the financial year ended December 31, 2024 (the "**Reporting Period**").

The Report is published annually and reviewed each year as we enhance our processes and procedures in response to the Act.

Our Business and Structure

GreenFirst is the parent company of the entities covered in this Report and is headquartered in Toronto, Ontario. The Company is a forest-first business committed to sustainable forest management. Our operations include the manufacturing, marketing, distribution and sale of lumber products. We believe that sustainable forest practices, paired with the long-term carbon-sequestration benefits of lumber, position GreenFirst to meet both cyclical and long-term demands for environmentally responsible building materials. The Company's long-term vision remains focused on being a green leader in the global forestry industry. We are a team of approximately 750 employees.



Our Supply Chain

Trees harvested from public forest lands in northeastern Ontario are the primary raw material used in the Company's softwood lumber sawmills. The Company's supply chain remains straightforward and traceable.

Local contractors from the communities surrounding our facilities in Chapleau, Hearst, Kapuskasing, and Cochrane- alongside Company personnel- carry out timber harvesting and product transportation to Company operations. The Company holds long-term forest licenses and is subject to oversight from the Ontario Ministry of Natural Resources and Forestry and third-party forest certification bodies.

Forest renewal activities, including tree planting, site preparation, and monitoring, are managed by the Company and executed by experienced Canadian suppliers. Product transportation within Canada and to the United States is handled by major northern Ontario-based rail and trucking companies.

Procurement activities- including sourcing of contractors and maintenance services- are managed by internal personnel, with a strong reliance on service providers located across northeastern Ontario, including Sudbury, Timmins, North Bay, and Sault Ste. Marie.



Policies and Due Diligence Processes to Prevent and Reduce Risk

To prevent and reduce the risk of forced labour or child labour in our operations or supply chains, GreenFirst has taken the following steps:

- i. Conducted updated internal assessments of forced and child labour risks;
- ii. Reviewed and enhanced external assessments of risk exposure across supply chains;
- iii. Continued to enforce internal controls over voluntary recruitment practices;
- iv. Strengthened and implemented due diligence frameworks for identifying and mitigating forced or child labour;
- v. Maintained and promoted grievance mechanisms available to all workers and stakeholders.

These measures reflect GreenFirst's ongoing commitment to human rights and supply chain integrity.

Policies and Standards

The Company's *Code of Conduct and Ethics Policy* ("CCEB") applies to all covered entities and affirms our legal and ethical standards. It fosters a culture of integrity, accountability, and respect. The CCEB provides clear mechanisms for employees to raise concerns—including potential incidents of forced or child labour—via the Confidence Line, accessible 24/7 by phone or online.



In alignment with these values, the Company completed four Forest Stewardship Council (FSC) audits in 2024. These audits addressed both forest management and the Chain of Custody systems that connect our managed forests with our four sawmills.

Each audit reviewed compliance with applicable legislation, including provisions of the International Labour Organization standards, and included interviews with government, First Nations, stakeholders, unionized and management personnel to confirm the Company's compliance. They also examined any concerns, complaints, or disputes related to forest operations.

The Chain of Custody audit specifically assessed company policies on child labour, labour relations, and employment conditions. In preparation for this audit and in alignment with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, our Code of Ethics was revised in fall 2024 to explicitly state:

Forced Labour and Child Labour

GreenFirst does not permit or condone any aspect of forced labour or child labour within our business operations and is committed to compliance with all laws and regulations to ensure it fosters only the highest standard of conduct.

Looking ahead, the Company will strive to enhance its practices related to supply chain due diligence and responsible sourcing. As part of this effort, we aim to explore and work toward the development of processes that:

- Introduce anti-forced labour and anti-child labour clauses into applicable new third-party agreements;
- Establish a framework to assess supplier risk based on factors such as country, industry, and supplier-specific characteristics;
- Incorporate the review of publicly available information to help identify supplier risk indicators.

These planned efforts reflect the Company's commitment to continuous improvement in strengthening alignment with the principles of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Addressing and Mitigating Risks and Remediation Measures

As of the end of the Reporting Period, GreenFirst has not identified any instances of forced labour or child labour within its business operations or supply chains. However, we recognize that risk evolves and remains vigilant in monitoring.

In the event that forced or child labour is detected, the Company will activate its remediation protocols, which may include supplier disengagement, stakeholder consultation, and reporting to authorities. Internal policy updates are being developed to support our commitment to not condoning nor participating in any aspect of child labour within our business operations.

Approval and Attestation

The Report was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the Company's Board of Directors.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this joint Report for the entity specified below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the joint Report is true, accurate and complete in all material respects, for the purposes of the Act, for the Reporting Period listed above.



Paul Rivett
Chair of the Board of Directors
May 20, 2025

I have authority to bind GreenFirst Forest Products Inc.