

Whitecourt Newsprint Company Limited
Partnership

Modern Slavery Report

For the Financial Year Ended December 31, 2024

2024 Modern Slavery Report

1. Introduction

This is the 2024 Modern Slavery Report issued by Whitecourt Newsprint Company Limited Partnership operating as Alberta Newsprint Company, a joint venture (“ANC”) for the activities during its financial year ended December 31, 2024 (the “Reporting Period”), in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9) (the “Act”). This Report only covers the activities and actions of ANC.

2. Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

ANC maintained its Core Labour Requirements Policy which includes a section on Abolition of Child Labour. ANC will establish a list of forward-looking measures to ensure the ongoing effectiveness of the Core Labour Requirements Policy and to strengthen our commitments to reducing risks of forced labour and child labour in our activities and supply chains.

3. Structure, Activities, and Supply Chains Structure

ANC is a limited partnership located in Alberta, Canada. ANC is a key economic engine and for the Whitecourt Area. Today, the mill employs over 200 people and is a significant contributor to the local (rural) economy of Alberta. The millsite began development in 1988, with the startup of the pulp and paper mill in 1990. A subsequent addition of a 60-megawatt power plant in 2014. ANC is a leading manufacturer of premium newsprint and high bright paper in North America. The Company manufactures up to 270,000 metric tonnes of paper annually. The mill site was started in 1989 with the start-up in 1990. The mill manages over 374,000 hectares of Crown land in western Alberta and is independently certified under the Sustainable Forest Initiative (SFI) for forest management and fiber supply, FSC Chain of Custody and PEFC Chain of Custody. The Company strives to balance its approach under four key focus areas: Environmental, Social, Cultural and Economic. As such, their forests are managed for a very diverse set of values including but not limited to wildlife, conservation and protection, recreation, fibre supply, Indigenous and carbon. In addition to business activities occurring in Alberta, ANC also conducts business with companies throughout Canada, the United States and Europe.

The majority of ANC’s sourcing from a value standpoint is wood fibre, which is solely sourced from Alberta. ANC strives to focus on local sourcing in Canada when possible, with quality goods and services being paramount. The company continues to operate as a high quality producer of newsprint and other paper products, sold in North America and throughout the world. ANC supports 600 suppliers, 300 of which are local to Alberta. 80% of our supplier spend is done in the province of Alberta. The remaining 20% is the rest of Canada, the United States and Europe. Services from suppliers include repair and maintenance; transportation; stevedoring; environmental; electrical; construction; and specialized trades. Goods acquired by ANC from its

suppliers include parts and equipment (e.g. machine parts, equipment and its parts, motors, bearings, vehicles, building supplies); and chemicals and other raw materials (wood fibre, various chemicals, finishing materials). Goods are sourced and shipped via ship, rail and truck.

4. Due Diligence Processes in Relation to Forced Labour and Child Labour

ANC's certification under FSC Chain of Custody includes Core Labour Requirements specifically addresses the Company's position and commitments in relation to forced labour and child labour and was in place within the reporting period. We at ANC are committed to demonstrating the highest level of ethical principles. We are fair in our procurement dealings and avoid any adverse conduct. It is the responsibility of all our employees, to maintain and exhibit faultless standards of integrity in all aspects of our business, both internally and externally, and firmly to reject those practices that may reasonably be deemed improper, ensuring that we are trusted and respected and that we are known for carrying out business efficiently in a fair and reasonable manner, and with integrity. The FSC Certification requirements include the following elements:

- The organization shall not use child labor
- The organization shall eliminate all forms of forced or compulsory labour
- ANC's human resources, finance, purchasing, and operations teams were responsible for ensuring compliance requirements

5. Forced labour and child labour risks

Due to the nature and location of its operations and suppliers being predominantly located in Canada (as discussed in further detail above at section 3.) ANC considers the risk of use of forced labour or child labour practices in its operations and supply chains to be low based on the jurisdictions where its suppliers operate. Similarly, ANC considers the risk of involvement in modern slavery practices by its suppliers to be low. ANC remains committed to taking steps to identify and address potential incidents of forced labour or child labour in our supply chains. Our suppliers are in countries with high standards of protection for employees and the rights of individuals, and do not pose a high degree of risk of forced labour or child labour practices. We acquire goods and equipment and services from reputable, established suppliers. Our suppliers are located in Canada, the United States and Europe. The majority of our suppliers have been doing business with the Company for more than 15 years.

6. Remediation Measures

ANC has not discovered the use of forced or child labour in its supply chain, and accordingly, has not had to undertake remediation activities.

7. Training During the Reporting Period,

In 2024, ANC's "Human Rights Policy" was approved and is assigned as mandatory training for all employees on a 3-year renewal schedule with individual employee sign off

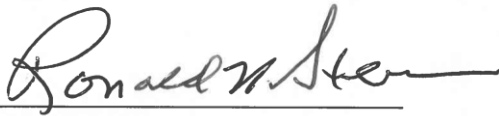
8. Assessment

ANC will continue to assess the ongoing effectiveness of its Core Labour Requirements and will consider the appropriate measures by which to evaluate the effectiveness of its new Human Rights Policy.

9. Approval and Attestation

This Report was approved by the Board of Directors of Whitecourt Newsprint Company Ltd., in its capacity as the general partner of the Whitecourt Newsprint Company Limited Partnership, for the financial year ended December 31, 2024, pursuant to paragraph 11(4)(a) 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 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.



Ronald N. Stern
Director