

WEST FRASER UK
ANNUAL STATEMENT
(MODERN SLAVERY)

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together**



West Fraser

Introduction

This statement is published in accordance with the Modern Slavery Act 2015. It summarises the steps taken by Norbord Europe Ltd, to prevent Modern Slavery and Human Trafficking occurring within our business or supply chain.

Norbord Europe Ltd are committed to ensuring that our business interactions with all parties are conducted in line with our Business Code of Conduct and as such treat customers, suppliers and employees with integrity and respect at all times. We are committed to the elimination of slavery in any form.

Modern Slavery is the exploitation of people who have been forced, deceived, or coerced into a life of labour and servitude. It is a crime hidden from society where victims are subjected to abuse, inhumane and degrading treatment. It can take many forms.

Organisational Structure

Norbord Inc was acquired by West Fraser Lumber Company Ltd on 1st Feb 2021. West Fraser now collectively has 63 production facilities (Lumber Mills, Engineered Woods, Pulp and Newsprint) across Canada, the USA and Europe and employs a total of c.10,000 employees. Although integration of the combined business is now underway, Norbord Europe Ltd is continuing to operate relatively unchanged at present. Our legal entity has not transitioned to date.

Norbord Europe Ltd is a large-scale producer of wood-based panels whose principal products comprise OSB, MDF and Particleboard. It also manufactures kitchen furniture. Norbord Europe employs 800 people across 4 mills - 3 in the UK and 1 in Belgium. Norbord Europe's most recent reported annual turnover was £555m (2022).

Our Business

Our business has 2 OSB mills (Inverness and Genk), 2 Particle Board Mills (Cowie and South Molton), 1 MDF Mill (Cowie) and a furniture factory at South Molton.

Our People

We have reviewed our Recruitment Policy and retrained all employees and recruiting managers on the importance of face-to-face checks with original copies of right to work documents. This year we have also increased our awareness through preparation for changes in the right to work system.

We have also upskilled the HR Team in how to identify fraudulent documents. We have set out our expectations with Strategic Agency Partners for temporary staff and have asked them to adopt the same standards. We have an established Preferred Supplier List for UK Recruitment (reviewed annually) and in addition ensure compliance with Agency Worker Regulations. We continue to develop our Personal Details Form to ensure it includes relevant bank details (e.g.name) and any anomalies are flagged and investigated where the primary account is different.

Our Learning Management System from Dupont, Nortrain, houses our Modern Slavery Act Commitment Statement and Modern Slavery Awareness Training. All line supervisors and managers are required to undertake awareness training annually.

In addition all employees complete a tool box talk written in conjunction with the latest guidance from our expert advisor. We also carry out independent reference checks to understand each individual's employment history. Any issues identified at site level are raised with Group HR.

Our Supply Chain

We have a large number of suppliers, all of whom must comply with the Modern Slavery Act and are subject to **pre-qualification** checks including disclosure of the following:

- any previous offences under the Modern Slavery Act 2015 (an “MSA Offence”);
- any previous investigations they have been subject to relating to an alleged MSA offence or prosecution under the Modern Slavery Act 2015;
- any knowledge that a member of their supply chain could give rise to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015.

Our supply chain agrees that it will:

- notify the Company promptly in writing if it becomes aware or has reason to believe that it, or any of its affiliates, officers, employees, agents or subcontractors have breached or potentially breached any of the Supplier’s obligations under this Condition. Such notice shall set out full details of the circumstances concerning the breach or potential breach of Supplier’s obligations.
- Conduct a programme of regular training for its affiliates, officers, employees, agents, subcontractors and other members of its supply chain to the extent required for its compliance with the Modern Slavery Act 2015.
- Keep a record of all training offered and completed by its affiliates, officers, employees, agents, subcontractors and other members of its supply chain to the extent required for its compliance with the Modern Slavery Act 2015 and shall make a copy of any such records available to the Company on request.
- Indemnify, defend and hold harmless the Company and its directors, officers and employees in full and on demand from and against any and all liabilities, claims, fines, demands, damages, losses or expenses (including legal and other professional adviser fees and disbursements), interest and penalties incurred by them resulting from a breach by the Supplier of the Modern Slavery Act 2015.
- Fully understand that any breach of this condition by the Supplier shall be deemed a material breach of the contract and shall entitle the Company to terminate the contract in accordance with Condition 48.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking does not take place anywhere in our supply chains. To date no issues have been identified.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we conduct due diligence checks as detailed above and include systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers. We have a confidential and dedicated Whistleblowing Hotline which has been in operation for a number of years and all employees are made aware of this at their induction. They can make contact in three ways: by phone, website or email.

Supplier adherence to our Values and Ethics

We adopt a policy of zero tolerance of Slavery and Human Trafficking. To ensure all those in our supply chain and contractors comply with our Values and Ethics we have in place a rigorous supply chain compliance programme as previously detailed.

Training

To ensure a high level of understanding of the risks of Modern Slavery and Human Trafficking in our supply chains and business, we provide training to all our staff via toolbox talks and poster campaigns. Line Managers are also asked to undertake additional training as are the Purchasing and HR Teams. In addition, this year we updated the whistle blowing hot line and reference details through a poster campaign.

Our effectiveness in combating slavery and human trafficking

To ensure there is no slavery or human trafficking in our supply chains we:

- Annually engage with STRONGER TOGETHER, to ensure that Managers complete the latest awareness course
- Issue an annual toolbox talk to all employees to increase awareness of Modern Slavery,
- Incorporate checks and red flags in our supply chain as part of our supplier audits.
- All Key supply chain partners were invited to attend an awareness session with Scotland Against Modern Slavery. Slides were issued to those who could not attend the virtual session.

In addition, we have fulfilled our previous commitment to create safe spaces across our sites which includes posters and information in relation to the warning signs our employees should watch out for. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Norbord Europe's Slavery and Human trafficking statement for the financial year ending March 2022.



Alan McMeekin
Managing Director & SVP of Norbord Europe (West Fraser)