

**Norbord Europe Ltd.  
(Operating as part of West Fraser Timber Co Ltd.)**

**Gender Pay Reporting 2023**

Norbord Europe Ltd. (a subsidiary of West Fraser Timber Co Ltd., hereinto referred to as “West Fraser”) believes inclusive, diverse teams build a more vibrant workforce, safer operations, and a stronger company overall. We strive to create workplaces and leadership teams that are reflective of the communities where we live and work. This is reinforced through our global [Diversity, Equity, and Inclusion \(DEI\) policy](#), as well as the Company [Indigenous Peoples’ policy](#), [Code of Conduct](#), UK Equal Opportunity policy (attached), and UK Bullying & Harassment policy (attached).

West Fraser is a diversified wood products company with more than 60 facilities in Canada, the United States and Europe. From responsibly sourced and sustainably managed forest resources, the company produces lumber, engineered wood (OSB, LVL, MDF, plywood, particleboard), and other products including pulp, newsprint, wood chips and renewable energy. We have four facilities operating in the UK as well as the Cowie Head Office.

Our UK-manufactured products are used extensively in the construction, DIY and furniture sectors. Our brands, SterlingOSB Zero, CaberFloor and CaberMDF, are well known in the construction industry and are commonly specified by architects, national housebuilders and specifiers.

**Definitions**

1. **Mean Gender Pay Gap:** The difference between the mean (average) hourly pay rate for all men and women in an organisation and the pay rate for women as a percentage of the mean hourly rate for men.
2. **Median Gender Pay Gap:** The difference between the median (mid-point) hourly pay rate for all men and women in an organisation and the pay rate for women as a percentage of the median hourly rate for men.
3. **Mean Bonus Pay Gap:** The difference between the mean (average) value of bonus for all men and women as a percentage of the mean bonus for men.
4. **Median Bonus Pay Gap:** The difference between the median (mid-point) value of bonus for all men and women as a percentage of the median bonus for men.
5. **Bonus Payment:** Proportion of male and females receiving a bonus.
6. **Quartile pay distribution:** The proportion of men and women in each 25% quartile of an employer’s pay structure. The hourly pay rates for men and women are ordered from lowest to highest and divided into four equal sections – lower, lower-middle, upper-middle and upper. The number of women and men in each quartile are calculated as a percentage of the total employees within the quartile that impacts our data at West Fraser.

## 2022 Data for West Fraser UK Operations

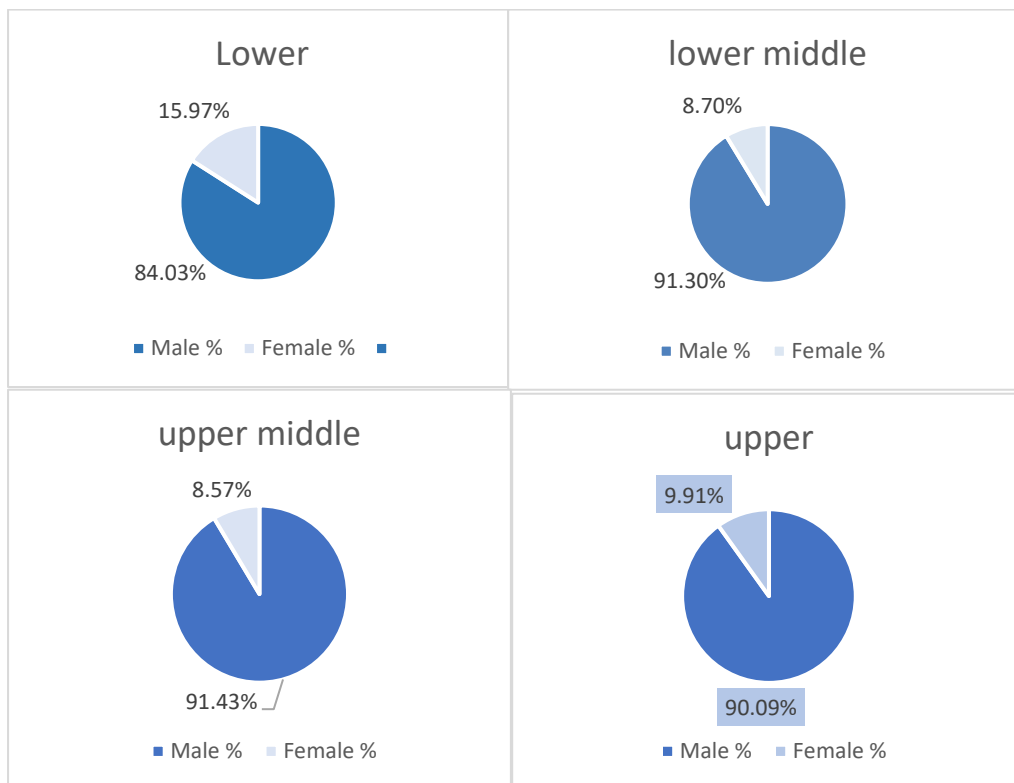
The following table separates our entire workforce into four quartiles based on the salaries that are paid to these employees. These Quartiles are then further broken down into the number and proportion, expressed as a percentage, of male and female employees in each quartile.

| Difference % Men -v- Women |  | Mean Hourly Rate | Median Hourly Rate | Mean Basic pay | Median Basic pay | Mean Bonus / SMIS | Median Bonus SMIS | Mean Earning Basic + Bonus | Median Earnings Basic + Bonus |
|----------------------------|--|------------------|--------------------|----------------|------------------|-------------------|-------------------|----------------------------|-------------------------------|
| All                        |  | 4.00%            | -5.00%             | 4.00%          | 0.00%            | 4.00%             | 0.00%             | 3.00%                      | 2.00%                         |

This data shows the difference between the average earnings of all male and female colleagues, regardless of their role or seniority, and has been submitted to the UK Government.

### Understanding our Pay Gap

The split across each percentile group is fairly evenly spread.



A pay gap exists because of an imbalance in the proportion of men and women across all levels of the organisation. We have a greater proportion of men in higher paid roles and employed across the UK Business. Therefore, the average rate of pay for a man is higher than a woman's, resulting in a pay gap.

This is not the same as equal pay where it is the legal requirement for men and women to be paid the same for performing the same work or work of equal value.

At West Fraser our approach is that we pay all employees fairly for the roles performed, regardless of gender.

We remain committed to increasing the diversity of our workforce at all levels.

### **West Fraser UK DEI Plan**

Gender equality continues to be a focus area within West Fraser's DEI strategy; this is outlined in our 2022 Sustainability Report, which describes our commitment to implement

DEI plans and actions at every level in the organization to improve representation of our leadership and workforce.

West Fraser is undertaking initiatives to further progress in this area across our operations in the UK. In 2022, this included:

- Company-wide DEI policy released and communicated (an evolution of our previous DEI statement)
- Leveraged job fairs (attended 10) and external partnerships to grow our talent pool in a manner reflecting our operating communities, including the UK Graduate Programme, Modern Apprenticeships, and Career Ready
- Continued to promote individual ownership and completion of annual personal development plans with all employees
- Established and shared Company-wide DEI goals (in our 2022 Sustainability Report)
- Implemented welfare rooms in each facility, which contain brochures on the Employee Assistance Program and Company resources on wellbeing

Looking forward to 2023, planned DEI initiatives include:

- Launching DEI and Unconscious Bias training for all employees
- Enhanced consistency of reporting through the integration of a centralized payroll system
- Expanding West Fraser leadership training to UK employees
- Partnership with Strathclyde University in Glasgow to support the Engineering the Future for Girls Programme
- Completing a review of corporate policies and guidelines
- Assessing job titles to ensure gender neutral language
- Making plan to increase divisional commitment and results

Our diversity, equity, and inclusion approach is foundational to achieving our strategic objectives to attract and retain engaged, talented, and high-performing people. Creating a culture of belonging for all employees is a goal at West Fraser, and we are focused on better understanding and evolving our employee experience.

I, Steve Roebuck, EHS Director, confirm that the information in this statement is accurate.

Sign 

Dated: April 2023

|                       |   |
|-----------------------|---|
| <b>Site:</b>          | <b>All UK sites (Inverness, Cowie and South Molton)</b> |
| <b>Procedure:</b>     | <b>Bullying and Harassment Policy</b>                   |
| <b>Issued By:</b>     | <b>Alan McMeekin</b>                                    |
| <b>Date of Issue:</b> | <b>March 2023</b>                                       |
| <b>Reference:</b>     |   |

### 1. PURPOSE

West Fraser is committed to providing a safe, healthy and productive working environment that is free of harassment and bullying and where everyone is treated, and treats others, with dignity and respect. The Company will not permit or condone any form of bullying or harassment.

This policy covers bullying or harassment of or by anyone engaged to work at the Company, and also by third parties such as customers or suppliers. The policy encompasses bullying or harassment that occurs in the workplace, and also out of the workplace, such as on business trips or at work-related social events.

This policy does not form part of your contract of employment, and we may amend it at any time.

### 2. SCOPE

This policy applies to anyone engaged to work at the Company and third parties such as customers or suppliers.

### 3. WHAT IS HARASSMENT?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. A single incident of this nature can amount to harassment if sufficiently serious.

Unlawful harassment may involve sexual harassment, or it may be related to any other of the Protected Characteristics, ie age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. The Company's stance is that harassment is unacceptable, whether or not it is targeted at any of these categories.

Examples of harassment may include (but are not limited to) the following:

- Display or circulation of sexually suggestive material or material with racial overtones;
- Use of slang names for racial groups, or age groups, or for disabled persons;
- Professional or social exclusion;
- Unwanted physical contact such as touching, pinching, pushing and grabbing;
- Unwelcome sexual advances or suggestive behaviour;
- Offensive emails, text messages or social media content.

It is important to note that harassment occurs even if the harasser perceives his/her behaviour as being harmless and without malice, or 'just a bit of fun'. What matters is how the behaviour makes the recipient feel and not what the perpetrator's intentions were. Also, a person may be harassed even if they were not the

intended 'target' of the behaviour. For example, a man may be harassed by sexist jokes about women if the jokes create an environment that is offensive to him.

#### **4. WHAT IS BULLYING?**

Bullying is a sustained form of psychological abuse. It is defined as offensive, intimidating, malicious or insulting behaviour, involving the abuse or misuse of power, which has the purpose or effect of belittling, humiliating or threatening the recipient.

Workplace bullying usually takes one of three forms; physical, verbal or indirect. It can range from extreme forms such as violence and intimidation, to less obvious actions, such as professional or social exclusion.

Examples of bullying may include (but are not limited to) the following:

- Shouting or swearing at people in public or private;
- Spreading malicious rumours;
- Inappropriate derogatory remarks about someone's performance;
- Physical or psychological threats;
- Constantly undervaluing effort;
- Rages, often over trivial matters;
- Ignoring or deliberately excluding people;
- Overbearing and intimidating levels of supervision;
- Deliberately sabotaging or impeding work performance.

Please note that managers are duty-bound to give their team members feedback and to generally manage their performance. Legitimate, reasonable and constructive criticism of a team member's performance or behaviour, or reasonable instructions given to an employee in the course of their employment, will not amount to bullying on their own.

#### **5. WHAT TO DO IF YOU ARE BEING HARASSED OR BULLIED**

##### **Informal Approach**

It may be possible to sort out matters informally. The person may not know that their behaviour is unwelcome or upsetting, so an informal discussion may help them to understand the effects of their behaviour and agree to change it.

If you feel able to, tell the person what behaviour you find offensive and unwelcome, and say that you would like it to stop immediately. You should keep a note of the date and what was said and done. This will be useful if the unacceptable behaviour continues and you wish to make a formal complaint.

If this is too difficult for you, then please talk to your manager, or a trusted colleague, for advice and assistance. They may, for example, speak to the person concerned on your behalf, or accompany you when you speak to them.

If the informal approach is not appropriate, or has not been successful, you should raise a formal grievance.

##### **Formal Procedure**

When an individual feels that they need to deal with an issue of harassment or bullying formally, they should do so according to the Company's grievance procedure.

We will investigate complaints in a timely, confidential and sensitive manner. The investigation will be conducted where possible by someone with appropriate seniority and experience, and no prior involvement in the complaint. Details of the investigation, and the names of the people involved, will only be disclosed on a 'need to know' basis. We will consider whether any steps are necessary to manage the ongoing working relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform both parties (separately) of our decision. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

## **6. CONSEQUENCES OF A BREACH OF THIS POLICY**

If after due investigation we consider that a team member has been harassed or bullied by an employee, the matter will be dealt with under the disciplinary procedure as a case of possible misconduct or gross misconduct. The person concerned may be suspended on full pay during the disciplinary investigation until any eventual disciplinary proceedings have been concluded. If the complaint of bullying or harassment is upheld, a disciplinary penalty may be imposed up to and including dismissal, depending on the seriousness of the offence and all relevant circumstances.

Some bullying or harassment will constitute unlawful discrimination if it relates to any of the Protected Characteristics as detailed above. Such behaviour could constitute a criminal offence, punishable by a fine and/or imprisonment.

Where it is found that an employee has been harassed by a third party, such as a customer, supplier or independent contractor, the Company will take such steps as are reasonably practicable to prevent any recurrence.

If someone makes a complaint which is not upheld, and the Company has good grounds for believing that the complaint was not made in good faith, the Company will take disciplinary action against the person making the false complaint.

## **7. PROTECTION AND SUPPORT FOR THOSE INVOLVED**

Individuals who make complaints in good faith, or who participate in any investigation, must not suffer any form of retaliation or victimisation as a result. Any employee engaged in retaliation will be subject to disciplinary action.

## **8. RECORD-KEEPING**

Information about a complaint by or about an employee may be placed on either parties personnel file, along with a record of the outcome and any other notes or documents compiled during the process. These will be processed in accordance with our Data Protection policy.

## **9. HOW WE CAN ALL HELP TO STOP BULLYING AND HARASSMENT**

We all have a shared responsibility to help create and maintain a working environment free of bullying and harassment. You can do this by:

- Considering how your own behaviour may affect others, and changing it;
- Being receptive, rather than defensive, if asked to change your behaviour;
- Treating your colleagues with dignity and respect;

- Taking a stand if you think inappropriate jokes or comments are being made;
- Making it clear to others when you find their behaviour unacceptable;
- Intervening, if possible, to stop harassment or bullying, and giving support to victims;
- Reporting harassment or bullying to your manager or another appropriate officer of the Company;
- Being open, honest and objective in any investigation of complaints.

Managers have a particular responsibility to:

- Set a good example by their own behaviour;
- Ensure that there is a supportive working environment in their team;
- Communicate to team members what standards of behaviour are expected from them;
- Intervene to stop bullying or harassment;
- Report promptly to HR or senior management any complaint of bullying or harassment.

Signed:

|   |  |
|---|--|
| Alan McMeekin, Managing Director & SVP: |  |
| Date:                                   |  |

|                         |  |
|-------------------------|--|
| Carol Brown, Head of HR |  |
| Date:                   |  |

|                       |   |
|-----------------------|---|
| <b>Site:</b>          | All UK Sites (Cowie Site , Cowie Group, South Molton and Inverness) |
| <b>Procedure:</b>     | Equality Policy   |
| <b>Issued By:</b>     | Alan McMeekin   |
| <b>Date of Issue:</b> | 1 <sup>st</sup> April 2023  |
| <b>Reference:</b>     | HR/POL/008  |

## 1. PURPOSE

Norbord Europe Ltd is committed to encouraging equality and diversity among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

In addition 'the company' recognise the benefits of being an Inclusive and diverse workplace which include: improved team performance and delivery, attractive to a wider talent pool, lower staff turnover rates, improved customer service and enhanced reputation.

## 2. SCOPE

This policy applies to all employees and potential employees. Although Norbord Europe expect the standards described to be displayed to all those who our employees engage with.

## 3. DEFINITONS

This policy is written in compliance with current legislation including:

- Equality Act 2010
- Equal Pay Act 1970
- Sex Discrimination Act 1975
- Employment Rights Act 1996
- Trade Union and Labour Relations (Consolidations Act) 1992
- Employment Equality (Religion or Belief) Regulations 2003
- Human Rights Act 1998
- Part-time Workers (Prevention of less favourable Treatment) Regulations 2000
- Employment Relations Act 2004
- Employment Equality (Age) Regulations 2006
- General Data Protection Regulation (2016/679 EU)



Discrimination is defined by the Equality Act as less favourable treatment on grounds of any protected characteristics including; age, race, sex, disability, gender reassignment, sexual orientation, marriage or civil partnership, pregnancy, maternity, religion or belief. Norbord Europe Ltd expect all employees to be treated with Dignity and Respect at all times.

Indirect discrimination is also covered by the Equality Act.

## **4. RESPONSIBILITIES**

### **Line Management Responsibilities**

- Familiarise themselves with this policy and procedure and communicating to colleagues for whom they are responsible
- Lead by example and ensure behaviours expected are instilled within their teams.
- Attending any training/briefing sessions which are provided to assist them with the fair and consistent implementation of the policy
- Understand the requirements to make reasonable adjustments where they are putting a job applicant or employee at a substantive disadvantage
- Take immediate action if they see any behaviours which are not acceptable.

### **HR Responsibilities**

- HR will ensure that managers and employees are aware of their responsibilities
- Ensure Policies are reflective of the company standards
- A robust system of monitoring ensures that our recruitment and selection practices not only meet our legal requirements but also actively promote equality of opportunity.
- Data is collected separately by the HR team for equal opportunities monitoring purposes.

### **Employee Responsibilities**

- All employees have a duty to promote this policy to ensure equal opportunities and prevent discrimination.
- Understand they have a right not to be victimised for making a complaint in good faith, even if the complaint is not upheld.
- Treat colleagues, customers and all third parties equitably and with dignity and respect
- Understand they can be held personally liable for acts of bullying, harassment, victimisation and unlawful discrimination against fellow employees, customers, suppliers and the public. Employees who commit serious acts of Harassment may be also be guilty of a criminal offence.
- Understand any allegations of discrimination will be taken seriously and investigated thoroughly which may result in action through the Disciplinary Procedure.
- Except that making a complaint you know to be untrue may lead to disciplinary action being taken against you.

## 5. PROCEDURE

Norbord Europe encourage fair treatment across all areas of employment and some of our provisions include but are not limited to the following:

### Recruitment and Selection

- All job adverts to be advertised through HR who will check for company standard
- Ensuring Line Managers receive training before they are allowed to recruit
- There will be a minimum of two interviews involved to prevent any personal bias.
- Request managers under take unconscious bias training
- Selection for Interview is made on objective sound reasons
- Ensuring Objective Competency Based Questions are used to assess individual's competence
- Recruiting Decisions are based on experience and capability to perform the role and not skewed by bias

### Performance Management

- Performance Targets are agreed with employees ensuring they are SMART. For operators level they may be focused on plant performance and not meet this criteria however they will be rated against their contributions and it will be a transparent process.
- Performance Discussions are around Objectives, Health and Safety and Company Values ensuring everyone is treated in an equitable manner.
- Employees are aware of welfare support available to them and understand they can voluntarily request support
- Ensure line managers are reminded of the support Occupational Health and Health and Safety can provide
- Any issues of underperformance will look at enablers and any reasonable adjustments which may be required.

### Career Development and Succession Planning

- All employees will be given freedom to perform and the opportunity to develop.
- Norbord Europe Ltd will look to identify those internally with high potential and a desire to progress and will help them develop career paths.
- Any employee can approach their line manager or HR for a Career Development Discussion.
- Talent pipeline is based upon both performance and potential.

### Employee Concerns

Any employee who is subject to or witnesses any inappropriate behaviour should raise it immediately to someone they trust in the business. Ideally this should be the employee's line manager or HR in the first instance.

Employees can also raise their concerns through the Grievance Policy.

They may seek support from a number of sources including Trade Unions, HR or Occupational Health.

Employees are also reminded that they can seek support from the Employee Assistance Programme. Details attached.

Signed:

|   |  |
|---|--|
| Alan McMeekin, Managing Director & SVP: |  |
| Date:                                   |  |

|                         |  |
|-------------------------|--|
| Carol Brown, Head of HR |  |
| Date:                   |  |