# *Modern Slavery*

West Fraser 2026

West Fraser

## *Introduction*

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by West Fraser Europe Ltd, to continuing to ensure that Modern Slavery and Human Trafficking is not taking place within our business or supply chain. We recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking and are committed to preventing it in our activities and that of our supply chains. This statement relates to actions and activities during the year 2024.

West Fraser 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.

## *Organisational Structure*

West Fraser 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 in July 2023

West Fraser Europe Ltd is a large-scale producer of wood-based panels whose principal products comprise OSB, MDF and Particleboard.
West Fraser Europe employs 600 people across 3 sites.

## *Our People*

We verify that all employees have the right to work in the UK before they commence employment with us and we make all employees aware of their working hours, working time regulations, holiday and leave entitlements and all other entitlements via policies and procedures.

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.

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 Learning Management System, West Fraser Academy, houses our Modern Slavery Training Course. All employees will complete.

## *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. Suppliers are assessed based on factors including geographic location, industry sector, use of temporary labour, subcontracting arrangements and previous compliance performance. This risk-based approach enables us to focus our monitoring and assurance activities on areas where the potential risk of modern slavery may be higher.

Our systems include:

- 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.

## *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 West Fraser Academy, to ensure that Managers complete the latest awareness course
- Issue an annual training course to employees
- Incorporate checks and red flags in our supply chain as part of our supplier audits. Supplier assessments in 2025 included both desk-based reviews and on-site inspections, with no violations identified.

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 West Fraser Europe's Slavery and Human trafficking statement for the financial year ending December 2025.

**Alan McMeekin**

**Managing Director**

**January 2026**