



WEYERHAEUSER COMPANY LIMITED

Report on Fighting Against Forced Labour and Child Labour in Supply Chains

FOR THE FINANCIAL YEAR ENDED DECEMBER 31, 2023

ABOUT THIS REPORT

Weyerhaeuser Company Limited ("WYL"), a Canadian forest and wood products manufacturing entity, has prepared this report (the "Report") pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ended December 31, 2023. All references in this Report to the "Company", "Weyerhaeuser Company Limited", "WYL," "we", "us", or "our" refer to Weyerhaeuser Company Limited unless otherwise indicated. This Report has not been externally assured. WYL does not report under similar legislation in any other jurisdiction; however, Weyerhaeuser Company ("Weyerhaeuser"), a U.S. entity and the ultimate parent company to WYL, reports pursuant to the *California Supply Chain Transparency Act*.

INTRODUCTION

Weyerhaeuser and the Weyerhaeuser-affiliated group of companies (the "Weyerhaeuser Group"), including WYL, oppose all forms of modern slavery, including child and forced labour. As part of the Weyerhaeuser Group, we are committed to respecting human rights throughout our operations and strive for our supply chains to be free of forced and child labour. Fundamental to our vision is the importance we place on people and treating everyone with dignity and respect.

As part of the Weyerhaeuser Group, our operations are guided by the United Nations Universal Declaration of Human Rights, the International Labour Organization Labour Standards, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the United Nations Declaration on the Rights of Indigenous Peoples. We aim to identify modern slavery risks, including forced and child labour risks, and address those risks in our supply chains and operations through a process of continuous improvement and collaboration with relevant stakeholders across our operations.

This Report describes the steps taken by Weyerhaeuser, at the parent level, that are directly applicable to WYL's supply chains and efforts to assess and address our risks with respect to forced labour and child labour. Monetary amounts included in this Report are expressed in U.S. dollars, unless otherwise stated.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Structure

Weyerhaeuser is a Washington state, U.S. corporation listed on the New York Stock Exchange and is the ultimate parent of the Weyerhaeuser-affiliated group of entities, including WYL. WYL is an indirect, wholly owned subsidiary of Weyerhaeuser and is a federally amalgamated company under the laws of Canada. WYL is extra-provincially registered in all provinces and territories in Canada with its head office located at 10277 154th Street, Suite 200, Surrey, BC V3R 4J7.



WYL owns and operates manufacturing facilities in Canada and is the long-term license holder of forestlands in Canada. Beginning October 1, 2023, WYL sold wood products to Canadian customers and performed some logistics and distribution functions. During all of 2023, WYL also sold wood products to Weyerhaeuser SC Company (“WYSC”), a wholly owned subsidiary of another Weyerhaeuser subsidiary, Weyerhaeuser NR Company (“WNR”), for sale and distribution within Canada and to WNR for sale and distribution into the U.S. Both WYSC and WNR are incorporated in the U.S. During the same year, WNR, which owns and operates Weyerhaeuser manufacturing and distribution facilities in the United States, manufactured and sold wood products to WYSC for sale into Canada. Neither WYSC nor WNR are reporting entities in this Report.

As of December 31, 2023, WYSC is no longer operational and has ceased all sales and other activities. WYSC was legally dissolved in May 2024. For the next reporting year (calendar and financial year 2024), all finished product imports into Canada will be reported under WYL due to the dissolution of WYSC.

As of December 31, 2023, WYL had approximately 1,400 employees, almost all of whom were employed on a permanent basis. Fifteen of its employees were based out of WYL’s head office in Surrey, Canada, in 2023. The remaining employees are based out of other locations in Canada, including approximately 660 employees in Alberta, 335 employees in British Columbia, 230 employees in Ontario, and 175 employees in Saskatchewan.

WYL’s president has the ultimate responsibility for risk management for WYL under the oversight of WYL’s Board of Directors, including forced and child labour risks. The president of WYL is supported by Weyerhaeuser’s corporate functions for legal, enterprise risk, and ethics & compliance, which are responsible for the management and governance of compliance with applicable laws in all countries in which Weyerhaeuser and its subsidiaries operate. WYL is assisted in its identification, assessment and management of forced and child labour risks in WYL’s supply chains by the cooperative effort of Weyerhaeuser’s corporate legal, corporate procurement and business segment procurement teams. Similarly, the Company’s legal and human resources departments and business division departments identify, assess and manage forced and child labour risks in WYL’s workforce.

Weyerhaeuser’s enterprise risk management function evaluates the likelihood of various risks and determines the potential magnitude of impact to Weyerhaeuser and its subsidiaries, including WYL. The analysis, applicable to WYL, is conducted under the guidance of Weyerhaeuser’s chief compliance officer, who reports to Weyerhaeuser’s senior vice president and general counsel and the Governance and Corporate Responsibility Committee of Weyerhaeuser’s Board of Directors, with assistance from other members of the management team, and is reviewed by Weyerhaeuser’s Board of Directors. Weyerhaeuser also conducts internal audits regularly to ensure compliance with environmental, safety, financial, disclosure and other regulations, voluntary standards, and its and its subsidiaries’ company policies. When noncompliance issues are identified, Weyerhaeuser develops, implements and tracks corrective action plans to ensure timely resolution. As a subsidiary of Weyerhaeuser, WYL’s supply chains and the assessment of its risks benefit from and rely on the steps taken by Weyerhaeuser, as set out in this Report.

Activities and Operations

Weyerhaeuser is one of the world’s largest private owners of timberlands. The Weyerhaeuser Group owns or controls 10.5 million acres of timberlands in the U.S. and manages an additional



14 million acres of timberlands under long-term licenses in Canada. WYL manages the Canadian timberlands, which like the rest of the Weyerhaeuser Group's timberlands are managed on a sustainable basis in compliance with internationally recognized forestry standards. The Weyerhaeuser Group's objective is to maximize the long-term value of the timberlands it owns.

The Weyerhaeuser Group is also one of the largest manufacturers of wood products in North America, manufacturing and distributing high-quality wood products, including structural lumber, oriented strand board ("OSB"), engineered wood products and other specialty products. These products are primarily supplied to the residential, multi-family, repair and remodel, industrial and light commercial markets. Weyerhaeuser's affiliates operate 28 manufacturing facilities in the United States and seven in Canada, which are those operated by WYL. Sustainability and citizenship are part of the Weyerhaeuser Group's core values and have been foundational to Weyerhaeuser Group and its culture from its early days. The Weyerhaeuser Group is the only company in its sector listed on the Dow Jones Sustainability North America Index in 2024.

WYL produces wood products and manages timberland licenses under two business segments, Wood Products and Timberlands. We manage Timberlands under long-term licenses that serve as the primary source of raw material for our manufacturing facilities in various provinces. When we harvest trees, we pay the provinces at stumpage rates set by the government. We transfer logs to our manufacturing facilities at cost and do not generate any significant profit from the harvest of timber from our licensed acres in Canada. These licenses are in Alberta, British Columbia, Ontario and Saskatchewan.

WYL's Wood Products segment manufactures high-quality structural lumber, oriented strand board, engineered wood products and other specialty products for the residential, multi-family, industrial, light commercial and repair and remodel markets. In addition, WYL exports some structural lumber and engineered wood products, primarily to Asia.

Our Supply Chains

WYL primarily procures Canadian sourced timber and veneer to process through its mills to manufacture lumber, OSB or other engineered wood products. Timber harvest in Canada is a highly regulated activity that is subject to legislation and regulations both provincially and federally. As a result, detailed harvest plans are required to be completed and approved prior to commencing any harvesting operations. The planning and approval process varies by province, and in general foresters develop a plan for the proposed cutting area that takes into consideration applicable laws and regulations, stakeholder values and sustainable forest management practices. A total of 90 percent of timber sourced by WYL is procured by WYL under our long-term timber licences with the Canadian government. The remaining 10 percent is sourced from third-party timber growers within Canada.

WYL also receives imported wood products manufactured by WNR in the U.S. All timber sourced by WNR is U.S. or Canadian origin fiber, with approximately 40 percent harvested from Weyerhaeuser-owned and managed land and 60 percent derived from third-party timber growers within the U.S.

WYL procures goods to support its manufacturing and operations from several jurisdictions globally, with the vast majority of its first-tier suppliers located in Canada and the U.S. WYL has a small number of first-tier suppliers located in Europe and Australia. In 2023, WYL made payments to 1,345 separate suppliers. Of these, 1,345 first-tier suppliers, a total of 99 percent



(1,335), were located in either Canada or the U.S. The remaining 1 percent of first-tier suppliers (10) were located across six countries: Australia, Germany, Ireland, Israel, Italy and the United Kingdom. According to the Global Slavery Index 2023, of these eight first-tier supplier countries of origin, 100 percent of our first-tier suppliers are based in low-risk countries.¹

Weyerhaeuser and its subsidiaries, including WYL, are committed to continuously evaluating the supplier due diligence program to further develop our understanding of child and forced labour risks across the geographical locations and industries applicable to the multiple tiers of our supply chains.

POLICIES AND DUE DILIGENCE

Weyerhaeuser has several regularly reviewed policies, standards and procedures that support its efforts to respect human rights in its operations and supply chains, including mitigating risks related to modern slavery, forced and child labour. These policies apply to WYL and all Weyerhaeuser subsidiaries.

Board Governance

Weyerhaeuser has a standing Governance and Corporate Responsibility Committee of its Board of Directors that takes a leadership role in shaping the governance of the corporation and provides oversight of Weyerhaeuser Group's programs for enterprise risk and ethics and business conduct. At least annually, the Committee reviews processes for administering Weyerhaeuser's Code of Ethics and Compliance Program, oversees the Weyerhaeuser Group's ethics and business conduct practices, trends and issues, and reports the Committee's findings to the Weyerhaeuser Board of Directors.

WYL's Board of Directors maintains the corporate records and operations of WYL in Canada and is responsible for oversight of WYL's compliance with laws and ethical practices.

Code of Ethics

The Weyerhaeuser Group has a demonstrated culture of ethics and integrity at every level of the organization. Since its founding in 1900, the Weyerhaeuser Group has consistently been recognized for its ethical business practices, compliance and high standards. In 2024, our parent company, Weyerhaeuser, was named for the 15th time as one of the World's Most Ethical Companies® by Ethisphere Institute, a global leader in defining and advancing the standards of ethical business practices.

The Weyerhaeuser Group's Integrity program and [Code of Ethics](#) apply to all employees across all members of the Weyerhaeuser Group, including board members, and it is an expression of a commitment and shared responsibility to conduct our business affairs ethically with stakeholders, including employees, communities, customers, suppliers, contractors and shareholders. WYL employees participate in regular compliance and ethics training, model and promote ethical behavior and are instructed on how to communicate concerns of unethical behavior. Weyerhaeuser maintains an EthicsLine system on behalf of the Weyerhaeuser Group, which permits any person, internal or external, to communicate ethics or compliance concerns to the Weyerhaeuser Group. The Weyerhaeuser Group's Code of Ethics contains clear

¹ See the Walk Free, Global Slavery Index 2023, available at [Global Slavery Index | Walk Free](#).



statements and requirements about fair working conditions and the prevention of forced and child labour.

Supplier Code of Ethics

Weyerhaeuser maintains a [Supplier Code of Ethics](#), which highlights the Weyerhaeuser Group's clear expectations for suppliers throughout its supply chains. The Supplier Code of Ethics emphasizes that the Weyerhaeuser Group's suppliers are expected to comply with all applicable laws, including laws relating to employment, human rights, the environment, and health and safety. It prohibits the use of forced and child labour and provides confidential resources for anyone to report ethics concerns or questions. The Weyerhaeuser Group, including WYL, expect that suppliers accept the performance standards contained in the Supplier Code of Conduct, including the expectation that each supplier will flow the Weyerhaeuser Group's expectations through its own operations and within its supply chains.

Human Rights Policy

The Weyerhaeuser Group's [Human Rights Policy](#) is guided by the United Nations' Universal Declaration of Human Rights and is part of Weyerhaeuser's Code of Ethics. The Weyerhaeuser Group has policies and programs in place to promote the protection of these rights. Our human rights program is periodically reviewed to identify any areas of improvement, and any major concerns are reported to Weyerhaeuser's Board of Directors. The policy states the Weyerhaeuser Group's commitment to respecting human rights in all Weyerhaeuser Group companies and supply chains.

Supply Chain Due Diligence Procedures

Weyerhaeuser, on behalf of the Weyerhaeuser Group, maintains several controls and processes to assess and address the risk of occurrences of child and forced labour, including communicating its standards and expectations to suppliers through the Supplier Code of Conduct and incorporating that Code into supplier agreements. These controls and processes are managed by corporate functions at Weyerhaeuser and apply to WYL.

Procured timber is WYL's most critical manufacturing raw material. To prove our forest management and wood fiber procurement practices are sustainable, we participate in independent certification programs for forest management, fiber sourcing and chain of custody. All the timberlands Weyerhaeuser and WYL own and manage are certified to the [Sustainable Forestry Initiative® \(SFI\) Forest Management Standard](#). In addition to our forests, Weyerhaeuser and its subsidiaries certify all our manufacturing facilities in Canada to the SFI Fiber Sourcing or Certified Sourcing standards, and select sites are certified to the SFI and PEFC Chain of Custody standards. The SFI Forest management standard requires adherence to the International Labour Organization's ("ILO") standards, including those applicable to forced and child labour. The Fiber Sourcing, Certified Sourcing and Chain of Custody programs require a due diligence system and risk assessment related ILO Declaration on Fundamental Principles and Right to Work, and analysis of areas without effective social laws and conflict timber.

Weyerhaeuser's procurement functions also conduct risk-based due diligence of the Weyerhaeuser Group's suppliers, including WYL's. As part of this process, Weyerhaeuser maintains an annual subscription with a third-party vendor, which collects data and



questionnaire responses about thousands of suppliers. Weyerhaeuser has access to those responses while making sourcing decisions to determine whether the suppliers have human rights compliance programs, and whether those suppliers have policies that address the use of forced and child labour in their business operations and those of any subcontractors and/or sub-suppliers.

The Weyerhaeuser Group utilizes a contractor qualification questionnaire for services contractors. The qualification questionnaire, last updated in 2023, has mandatory compliance elements requiring contractor candidates to disclose their compliance with child or forced labour laws and regulations. Responses to this questionnaire are managed by the third-party vendor supporting our supplier due diligence.

POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

In 2023, Weyerhaeuser took multiple actions to prevent or reduce the risk of child and forced labour in the Weyerhaeuser Group's operations and supply chains, including but not limited to:

- Monitored the latest governmental requirements and guidance on modern slavery risks, forced labour and child labour;
- Completed third-party audits to maintain our SFI certification by demonstrating adherence to all applicable standard requirements, including validation that its operations are at low risk of sourcing wood from forest activities where the spirit of the ILO Declaration on Fundamental Principles was not met or from areas without effective social laws;
- Conducted a supply chain mapping analysis in high-risk regions to evaluate risks regarding second-tier suppliers and to abide by the U.S. Uyghur Forced Labor Prevention Act;
- Updated its contractual terms in its Master Services Agreement, which specifically references compliance with laws and identifies "compliance with... child welfare, human rights, wage, and hour and other workplace laws and regulations;"
- Conducted an enterprise and compliance risk assessment companywide that included supply chain topics;
- Reviewed, updated and republished the Human Rights Policy; and
- Reviewed, updated and republished the Code of Ethics.

Potential Risks in Our Operations

WYL maintains operations solely within four provinces of Canada, including Alberta, British Columbia, Ontario and Saskatchewan. WYL considers its wholly owned operations in Canada to carry a low risk of modern slavery given our workforce and human resources policies and procedures. The employees within our reportable operating segments work in Canada only, where there is a low prevalence of forced or child labour, a low risk of vulnerability to modern slavery and a reasonably robust government response to reports of concerns of modern slavery. Our directly employed and contracted workforce largely consists of skilled, qualified and experienced individuals. Moreover, WYL's workforce is governed by the applicable Canadian



federal and provincial labour and employment standards, in addition to our policies and procedures that govern recruitment, labour sourcing, working conditions and the ethical treatment of our employees.

Weyerhaeuser maintains procedures and internal controls applicable to the Weyerhaeuser Group, designed to safeguard the rights of its employees. These include its internal policies and practices pertaining to recruitment, employee background screening processes, surveys on employee engagement, Weyerhaeuser EthicsLine system, and evaluation of compensation practices. WYL conducts background screens on new employees through an independent third-party vendor, which vets for both age and parental consent.

To promote the reporting of all possible misconduct or illegal behavior, the Weyerhaeuser Group maintains an ethics and compliance program. Weyerhaeuser contracts with an independent third party to provide its EthicLine and reviews and investigates reported concerns, including those pertaining to any violations of laws. In 2023, there were 155 reported concerns to the EthicsLine, of which none related to forced or child labour. Of these 155 reports, a total of five were from WYL locations.

In addition, WYL has grievance resolution processes, which are applicable at its unionized locations. A total of 30 percent of WYL employees are members of unions. Weyerhaeuser's procedures emphasize its commitment to all employees, suppliers, customers and other stakeholders and affirm that Weyerhaeuser and its subsidiaries respect and observe human rights in accordance with applicable law and the principles set forth in international standards.

Potential Risks in Our Supply Chains

Based on the Weyerhaeuser Group's enterprise and compliance risk assessments conducted in 2023, we consider the overall risk of forced or child labour in our supply chains to be low. As noted above, WYL sources the vast majority of raw materials, supply chain goods and services from low-risk countries per the Global Slavery Index 2023.² These risk assessments indicated that the majority of the goods we purchased were from low-risk jurisdictions, and none of our first-tier suppliers was identified as being high risk based on a review of information provided by global providers of risk data and publicly available information.

We understand that certain manufacturing regions and materials carry higher risk of forced and child labour by virtue of the prevalence of such illegal activities in particular countries. There are also risks linked to certain industries such as manufacturing and agriculture even in countries considered to have lower risks. We recognize that some of our first-tier suppliers are likely to rely on extensive global supply chains for the goods and/or services provided to us, which makes it challenging for us to have meaningful visibility across our supply chain beyond our first-tier suppliers. Weyerhaeuser, on behalf of the Weyerhaeuser Group, monitors the U.S. Department of Labor's "2022 List of Goods Produced by Child Labour or Forced Labor" and has not identified any directly procured goods from countries flagged as high risk, generally or in respect of WYL's supply chains.³

² Walk Free, Global Slavery Index 2023, available at [Global Slavery Index | Walk Free](#).

³ The U.S. Department of Labor 2022 List of Goods Produced by Child Labour or Forced Labor is available at https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TPVRA-List-of-Goods-v3.pdf.



The governance, policies and due diligence, as well as the ethics and compliance program, help WYL, as part of the Weyerhaeuser Group, to mitigate the potential risks in its supply chains. We intend to continuously evaluate our due diligence processes and, where applicable, make changes to the processes, including refining our risk assessment processes as required, to evaluate and manage the risk of forced and child labour in our supply chains.

MANAGEMENT AND MITIGATION OF POTENTIAL RISKS

Weyerhaeuser conducts ongoing risk management activities that include annual assessments and mitigation actions for human rights, compliance, ethical business conduct, and other critical legal topics. These risk management resources are available to the Weyerhaeuser Group's employees depending on their specific role and location and include risk-based customer and third-party management, targeting those high-risk third parties acting on behalf of Weyerhaeuser and WYL. Weyerhaeuser's companywide procurement, raw material and supply chain functions are primarily responsible for third-party due diligence processes of suppliers, which are supported by the law department and the ethics and compliance team. As noted above, Weyerhaeuser's enterprise risk function conducts detailed assessments each year weighing the likelihood and impact of compliance topics, such as human rights, which then guide the Weyerhaeuser Group's management in the allocation of resources to mitigate such risks through activities designed to promote increased detection, such as monitoring and auditing activities. The Weyerhaeuser Group's compliance subject matter experts participate in all levels of these risk assessments.

In the event that the Weyerhaeuser Group is informed of the potential or confirmed presence of forced or child labour in its supply chains, there are processes in place to facilitate any investigation and implementation of appropriate remedial measures, as necessary. Based on our assessment of our activities and supply chain, WYL has not identified any instances or allegations of forced or child labour within our workforce or our first-tier supply chains. Accordingly, no steps were required in 2023 to remediate child or forced labour or the loss of income to the most vulnerable families associated with remediation efforts.

TRAINING

All WYL employees must complete Code of Ethics training when first hired and then periodically thereafter. In 2023, all new WYL employees completed Code of Ethics training within their first 60 days of employment. In 2023, all WYL employees received communication about the updated Code of Ethics from executive management, which contains provisions regarding the prohibition of forced and child labour. We update and rotate our compliance training topics on a regular basis as part of our risk-based training strategy. We also provide refresher training on a periodic basis to address new or changing legal and compliance risks. Training is provided in multiple formats, including online training supplemented by classroom and webinar sessions provided by Weyerhaeuser ethics and compliance staff and legal counsel.

ASSESSING EFFECTIVENESS

The Weyerhaeuser Group strives to prevent forced or child labour in its operations and supply chains principally through the ethics and compliance program and the incorporation of its Supplier Code of Ethics into our contractual requirements for suppliers and third-party partners. Several mechanisms support the assessment of the effectiveness of these resources for the Weyerhaeuser Group, including WYL, including the oversight of suppliers through background



screening resources by Weyerhaeuser's core procurement functions, participation in annual enterprise and compliance risk assessments, analysis of employee survey responses, and continuous management of the Weyerhaeuser EthicsLine and investigation of any applicable reported concerns.

Weyerhaeuser also maintains a certification with the U.S. Customs Trade Partnership Against Terrorism (CTPAT) Security Program, which is applicable to all seven of WYL's manufacturing locations in Canada. This program requires Weyerhaeuser to maintain a social compliance program that covers forced labour prevention. Weyerhaeuser received revalidation of its CTPAT Security Program certification in 2023 after site audits of its headquarters in Seattle, Washington, and one of WYL's engineered wood product mills located in Kenora, Ontario.

As WYL continues the development of its supply chain compliance program, WYL is committed to continuing to take steps to monitor the effectiveness of our actions to prevent forced and child labour in our business and supply chain. Weyerhaeuser's procurement, ethics and compliance, law, and internal audit departments are engaged with Weyerhaeuser and its subsidiaries, including WYL, to provide support and advice on managing forced and child labour risks in our operations and supply chains.

APPROVAL & ATTESTATION

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 or entities 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.

I have the authority to bind Weyerhaeuser Company Limited.

Kristy Harlan
General Counsel, Weyerhaeuser Company
Director, Weyerhaeuser Company Limited
May 13, 2024