

## 2024 Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

#### Introduction

This report has been prepared by Nelson Lumber Company Ltd (Nelson Lumber) in response to the requirements under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) for our financial year ending February 28, 2025.

Our approach to preventing and reducing the risk of forced labour and child labour in our building materials production and supply chains has focused on monitoring the health and safety of workers on our sites and requiring our suppliers and contractors to comply with applicable laws relating to Canadian employment, labour relations, human rights, and safety.

#### Organizational structure, activities, and supply chain

Nelson Lumber has operated in Alberta for over 10 years. Our head office is in Edmonton, Alberta.

We supply quality lumber products, including sheet goods, engineered wood products (EWP), framing materials and other building materials, hardware, trusses, and ready-to-move homes. We own and operate three manufacturing plants in Alberta where we produce our floor and roof trusses and wall panels. We sell our products in Western Canada and the United States.

We have 225 employees in Alberta. Most of our employees at our manufacturing plant are unionized. We do not hire temporary workers or use labour intermediaries.

Our supply chain consists of sourcing lumber and EWP products and equipment, tools and parts used in our operations from Canadian and, at times, U.S. distributors. Our supply chain is closely aligned with the location of our operations in Alberta.

# Steps to prevent and reduce the risks of forced labour and child labour

In this reporting year, Nelson took the following steps to prevent and reduce the risks of forced labour or child labour in our operations and supply chain:

- Continue implementing workplace safety and human rights programs and verifying age requirements in accordance with applicable Canadian employment laws
- Use questionnaires, declarations and contractual clauses to ensure direct suppliers and subcontractors follow safety requirements and comply with employment, human rights and safety laws on our sites
- Procure most production materials from reputable, long-term Canadian and U.S. suppliers

#### Policies and due diligence processes

Nelson's policies and processes focuses on the impact of workers in our manufacturing activities in Alberta and engaging with suppliers and contractors to ensure compliance with applicable employment, human rights and safety protections for workers.

To prevent the use of forced labour and child labour in our operations, Nelson has adopted procedures to comply with applicable laws relating to health and safety, human rights, and employment standards regulations governing our hours of work, safe working conditions, and age of employment. These procedures apply to all employees, temporary workers, and contractors.

In our supply chains, we are committed to doing business with reputable, ethical suppliers. We rely on our suppliers to adopt responsible business practices. Our suppliers are in Canada and the United States and therefore subject to provincial, state, and federal laws governing working conditions and age of employment. We select our suppliers based on their reputation as well as the quality of their goods and services. We use questionnaires, declarations and contractual clauses to ensure the suppliers and subcontractors on our worksites follow our safety requirements and comply with employment, human rights and safety laws.

#### Assessing the risk of forced labour and child labour

Nelson's operations and most of its direct suppliers operate in Canada, where worker rights are protected under the employment, labour, human rights and safety laws. For these reasons, we have identified the risk of forced labour and child labour in our operations and direct supply chains to be low.

We do not have visibility over our suppliers' extended supply chain and rely on our suppliers to adopt due diligence processes and policies to ensure no forced labour or child labour is used in the production of their goods.

#### Remediation measures and remediation of loss of income

Nelson has established policies and processes that encourage workers to report concerns relating to health and safety or other human rights. This includes a whistleblower hotline and anonymous caution cards which are available at all branches and reviewed weekly. To date, we have not received any complaints relating to forced labour or child labour in our operations or supply chain, and as such has not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

### **Employee training**

All workers are required to undergo site safety briefings prior to entering site and to attend mandatory training relating to compliance with health and safety regulations. In this reporting year, we did not provide training to employees specifically on the risks of forced labour or child labour in the supply chain.

#### **Assessing effectiveness**

Nelson monitors compliance of our workers and contractors with the standards set out in our Safe Work Environment Policy and Harassment Policy. In this reporting year, we did not adopt assessment measures relating to forced labour or child labour in our supply chain.

#### Approval and 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 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.

Dated in the City of Edmonton, Alberta, this 26th day of May, 2025.

Erick Hamdan, Director I have the authority to bind Nelson Lumber Company Ltd.