

## **COMPLIANCE AND CODE OF CONDUCT PROGRAM**

Western Forest Products Inc. and its wholly-owned subsidiaries (“Western” or the “Company”) are committed to upholding the highest standards of legal and ethical conduct in the operation of its business. Western’s Code of Business Conduct and Ethics (“Code of Conduct”) provides a guiding framework for our employees, officers, directors, contractors and suppliers on:

- **Compliance with Laws and Regulations**
- **Avoiding Conflicts of Interest**
- **Confidentiality**
- **Ethical Conduct**

The Company’s employees, officers, directors, contractors and suppliers are expected to know and comply with the Code and the supplemental requirements presented in Western’s other relevant policies.

### **Seek Guidance and Report Concerns**

Making the right decision in every situation is not always straightforward. If you are ever involved in a situation in which the right course of action is unclear, you are encouraged to seek guidance. If you are uncomfortable speaking directly with a superior or representative at Western, we invite you to contact Western’s Compliance and Code of Conduct Program:

#### **TO CONTACT THE WESTERN FOREST PRODUCTS INC. COMPLIANCE AND CODE OF CONDUCT PROGRAM**

**CALL 1-866-895-4113 (TOLL-FREE) OR ACCESS  
[HTTPS://WESTERNFIRST.NAVEXONE.COM/INTAKE ONLINE](https://westernforest.navexone.com/intake)**

### **Common Questions**

#### **What is the Compliance and Code of Conduct Program (the “Program”)**

The Program is a way to voice concerns or seek guidance. Employees, contractors or customers may call this toll-free service or access the online intake twenty-four hours a day, seven days a week, to ask a question, or to report possible violations of the Code of Conduct, the Company’s policies or applicable laws, rules and regulations.

The Program is **not** designed to question financial or business decisions taken by the Company as part of its normal business operations.

### **What kind of violations should be reported?**

Contact the Program to report or obtain guidance about ethical concerns or to report possible violations relating to:

- Compliance with Laws and Regulations
- Use of Confidential Information
- Conflicts of Interest
- Receiving and Giving Business Gifts beyond a Nominal Value
- Compliance with Safety and Environmental Laws
- Discrimination or Harassment
- Workplace Violence
- Family and Personal Relationships on the Worksite
- Financial Integrity
- Securities and Insider Trading
- Improper Use of Company Name or Property

It is important to remember that while the Program is a valuable tool, Western has many internal processes in place to address workplace issues, including through its various policies and collective agreements ("Reference Materials"). Before contacting the Program, employees are encouraged to speak to their supervisor or the Company's Human Resources department ("HR") or determine if the Company's Reference Materials can be used to address the employee's issue.

### **What happens if you contact the Program?**

A trained specialist who is employed by an outside organization, **not** Western, answers you. If you call in, the specialist takes notes as you describe your concern and may ask for more information. You are given an identification number and a specific date to contact the Program to check on the status of your concern or to receive a response to your question. If you have provided your name, you may be contacted by someone from Western.

### **What if English is not your first language?**

The service provider for this program can provide support for over 1,500 languages within 2 to 3 minutes of the initial contact.

### **Do you have to give your name?**

Although you are encouraged to give your name to help in the investigation process, you do not need to give your name and can instead make a report anonymously.

### **What if you do not know all the details?**

Employees, contractors or customers can contact about any behaviors or compliance issues that concern them. Even if your information is incomplete, the details you share could keep a serious situation from occurring.

### **Are calls recorded or traced?**

Calls through the Program are never traced, and recording devices are never used.

### **What happens after you contact?**

- A report is created based on the information you provide.
- The report is forwarded to the Chair of the Audit Committee and Western's designated contacts representing Legal, Human Resources, Safety and Finance (currently comprised of the Senior Vice President, General Counsel and Corporate Secretary; Director, Human Resources; Senior Manager, Talent and Rewards; Senior Vice President, Human Resources and Corporate Affairs; and the Chief Financial Officer) via e-mail. Notwithstanding the above, the report will not be forwarded to anyone who the report is about, including a designated contact.
- The report is reviewed by the Company's HR to determine if the complaint should be addressed through established Company Reference Materials or if an investigation outside the scope of the Reference Materials is required. HR may call on other Company personnel or retain third party consultants or advisors to assist in the evaluation of the complaint. Following which:
  - If it is determined that the complaint is one that should be addressed by the Company's Reference Material, the response will direct the complainant to the appropriate document; or
  - If it is determined that the complaint is one that is outside the scope of the Company's Reference Materials, the Company's HR and/or Legal department will commence an investigation into the allegation.

The investigation will include:

- Identifying and assessing all pertinent issues and concerns that are being raised. If a complainant has provided their name, this step may require that the complainant be contacted for additional information.
  - Determining the steps and actions that are needed to follow-up on the issues and concerns raised. This step may require interviews with the complainant (if a complainant has provided their name), witnesses and others associated with the complaint. It may also require a review of documents and/or other relevant evidence.
  - Reaching a finding from the information received and drawing recommendations.
- Once the investigation is completed, the Company will respond to the complainant with their findings and any corrective action taken if a complainant has provided their name. If a complainant has not provided their name, then the complainant will need to contact the Program to determine the status of their issue/concern.

### **Will there be retaliation for making the report?**

Any employee, contractor, or customer can raise concerns without fear that they will be disciplined or terminated for doing the right thing. Western prohibits retaliation against any person making reports in good faith, which means telling the truth as you know it to be.

### Compliance

All officers, directors, employees, consultants and agents of the Company have an obligation to cooperate and comply with any review or investigation initiated. Quarterly activity reports are also provided to the Chair of the Audit Committee, the President & CEO, the Chief Financial Officer, the Senior Vice President, Human Resources and the Senior Vice President, General Counsel and Corporate Secretary.

If you have any questions or concerns regarding this document or the Program please contact:

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