



Fighting The Forced Labour and Child Labour in Supply Chains Statement and Policy

Introduction

This Policy and Statement sets out Centurion Lumber's actions to understand the potential forced labour risks related to its business and to put in place steps that are aimed at ensuring there is no forced labour or child labour in its business or its supply chain.

Centurion Lumber Ltd. (BN 10089 5069) fully supports the aims of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) and makes this statement as a single reporting entity in accordance with Section 11 of the Act. Our organization is absolutely committed to preventing forced and child labour in our corporate activities, and to ensuring that its supply chains are free from these issues.

This report addresses each or the requirements included in section 11 of the Act as it relates to actions and activities during the 2025 fiscal year.

Organizational Structure

This statement covers the activities of Centurion Lumber Ltd., a wholesale lumber and wood products Corporation. Established in 1968, in Chemainus, BC, Centurion Lumber is a third-generation family run business that markets a wide variety of building and specialty lumber products.

Countries of Operation and Supply

Centurion Lumber currently operates in Canada, the United States and China. Alongside Canadian lumber, Centurion imports from Europe and the United States to supply North American and Asian markets. We have cross-referenced these suppliers against the Global Slavery Index, identifying Ukraine as the geographic area that has the potential to pose the greatest risk of forced or child labour in Centurion's supply chain. The organization recognizes elevated supply-chain risks associated with timber harvested in Ukraine due to the ongoing conflict-related governance challenges. The organization mitigated those risks through document verification and supplier declaration processes to improve traceability and legality assurance. During the reporting year we onboarded 2 suppliers who presented with moderate risk. Following the review of the supplier questionnaire and raw material source disclosure, we assessed the risk to be low-moderate.

The company also sells plywood, veneer, oriented strand board and wood mats to Canadian and United States customers. These products are produced in facilities or suppliers with whom we have long-standing relationships.

Centurion Lumber Ltd. became PEFC certified in 2025, further aligning its sourcing practices with the intent of the Act.

The following is the process by which the Company assesses whether or not particular activities or countries are high risk in relation to forced and child labour.

Although forced and child labour can be found in all countries, there are certain countries associated with a higher risk. We use the Global Slavery Index to assess the prevalence of modern slavery in the countries we source from. We reviewed the current 'List of Goods Produced by Child Labor or Forced Labor' published by The Bureau of International Labor Affairs. Centurion Lumber does not source timber from any of the countries identified on the



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list. Our products have not been identified as inputs used in the production of downstream goods at risk. We are cross-referencing new suppliers with the UFLPA Entity List. Centurion Lumber will continue to monitor any changes or developments in risk factors.

Responsibility

Responsibility for our prevention and reduction of forced labour initiatives is as follows:

- **Policies:** Our policies communicate our organization's values and standards, making it clear that we do not tolerate any level of human right violations including forced labour and child labour. We are committed to continuously improving our approach to reflect our commitment to acting ethically in all business relationships.
- **Risk Assessment:** Assessing and understanding risks is a critical step in ensuring that our operations prevent and address the issue. Centurion Lumber conducts internal analysis and assessments at a global level to help identify any potential risks of human rights violations across the entirety of our business operations.
- **Due Diligence:** Our human resources and compliance teams are responsible for the due diligence of assessing and mitigating our risk factors. Investigations in relation to known or suspected instances of forced or child labour would be carried out by our legal team.

Relevant Policies

- **Code of Conduct.** Our code makes clear to employees the actions and behaviour expected of them when representing our organization. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating domestically and abroad and managing its supply chain. It's expected that all individuals working for or under Centurion Lumber Ltd. comply with the code.
- **Respectful Workplace policy.** Our respectful workplace policy is an extension of our code of conduct and ethics dedicated to ensuring that Centurion Lumber presents a supportive, respectful, and safe work environment free of bullying, harassment, discrimination, and violence. We are committed to treating our employees, contractors, customers, and partners with respect, dignity, and in accordance with all applicable legislation.
- **Whistleblowing policy.** We encourage all employees, customers, and other business partners to report any concerns related to the direct activities, or the vendors and suppliers, of our organization. This includes any circumstances that may give rise to an enhanced risk or forced or child labour.
- **Forced and Child Labour Policy.** This policy reaffirms our commitment to respecting and promoting human rights, and to eliminating all forms of forced and child labour in our operations and supply chains. This policy outlines our expectations, responsibilities, and procedures to prevent, identify, and respond to any such risks.

Due Diligence

We undertake due diligence when taking on new suppliers, as well as employee related processes. Our due diligence and reviews include:

May 15, 2026



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- Evaluating the forced and labour risks of each new supplier.
- Monitoring of forced and child labour lists from global organizations.
- Verifying that all individuals are eligible to work at Centurion Lumber Ltd. and meet all applicable age requirements during the pre-employment screening. Centurion Lumber follows all applicable wage and labour, laws and provides ethics and compliance training as part of the onboarding process.

Remediation Measures

No incidents of forced or child labour were identified in 2025. As such, no remediation measures have been taken to date. Centurion will continue to assess its activities and supply chains and consider appropriate means of remediation for forced or child labour should they arise.

Continuous Improvement

Centurion Lumber Ltd. continues to review the strategic objectives outlined in its prior report and considers these goals to remain relevant to its ongoing approach to identifying and mitigating risks related to forced labour and child labour within its operations and supply chain.

- Improving our due diligence by requiring suppliers to provide a declaration as supporting evidence of their compliance with our standards. Periodically reviewing supplier performance to maximize compliance.
- Moving beyond Tier 1 Due Diligence
- Maintaining a continuous review system of all products and suppliers and assessing its effectiveness in ensuring that forced labour and child labour are not being used in our business or supply chains.
- Requiring all employees to complete training on assessing and identifying risks of forced labour and child labour in relation to various aspects of the business, and what steps should be taken if it's suspected.
- Develop specialized training for our purchasing and sales teams on upstream and downstream risk indicators.