

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Western Forest Products Inc. (“Western” or the “Corporation”) and its subsidiaries are committed to upholding the highest standards of legal and ethical conduct in the operation of its business.

Western will not tolerate bribery or corruption. Western’s Code of Business Conduct and Ethics (“Code of Conduct”) provides a guiding framework for our employees, officers, directors, contractors and suppliers on how to prevent and address conflict of interest, which may include bribery and corrupt practices. Our employees, officers, directors, contractors and suppliers are expected to know and comply with the Code of Conduct and the supplemental requirements presented in this policy.

Anti-Corruption and Bribery Legislation

We obey the law in all countries where we do business, including anti-corruption and bribery laws such as the Corruption of Foreign Public Officials Act (Canada) and the Foreign Corrupt Practices Act (United States), collectively referred to as the “Acts”. The Acts were adopted to prevent:

- Improper payments made by multi-national companies to foreign public officials; and
- Improper recordkeeping and accounting engaged by reporting companies.

It is Western’s policy to comply with the Acts and conduct its business in such a way as to not appear to conflict with the Acts. To this end, Western shall make and keep records and accounts that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the Corporation’s assets. Western’s legal and corporate finance departments maintain a system of internal accounting controls providing reasonable assurances that Western is conducting its business in strict compliance with the Acts, and to assure that none of Western’s employees bribe public officials to influence official action to help Western obtain or retain business.

Sensitive Domestic Payments

Western strictly complies with the Acts. It is the Corporation’s policy to also ensure that no improper or illegal payment or other advantages or consideration (including gifts and excessive entertainment), whether monetary or non-monetary or tangible or intangible, are made, directly or indirectly, to public officials, civil servants, real estate agents, lumber or timber brokers, suppliers, customers, or anyone else to induce favorable action or inaction on the part of the recipient. Accordingly, it is against Western policy for any employee, officer, director, contractor or supplier to make or receive a bribe, kickback, facilitation payment, improper payment, gifts (other than nominal gifts or hospitality generally acceptable as part of doing business) to or from a public official, civil servant, supplier, customer, etc. For the purposes of this policy, a “facilitation payment” means payments typically of small amounts to secure or expedite the performance of routine non-discretionary government action or other services to which a person is legally entitled to without having to make such payments.



All employees, officers, directors, contractors or suppliers shall comply with all federal and local laws, regulations and ethical standards of business conduct. Except as specifically permitted by federal, state, provincial and local law and in accordance with the Corporation's Lobbying Policy and related guidelines, no Western funds shall be used to make contributions or payments to candidates or causes.

In the event that a violation of this policy is suspected, it must be reported immediately to Western's Vice President, Legal and General Counsel and Corporate Secretary (the "General Counsel"). The General Counsel will investigate all reports received and treat all information confidentially.

Penalties and Consequences

Violations of anti-bribery or corruption laws can result in both civil and criminal penalties for both the Corporation and individual employees, officers and directors. Individuals may be fined and imprisoned as the result of criminal prosecution. In addition, employees and officers violating this policy are subject to disciplinary action, up to and including termination of employment.

Training

We strive for the highest standard of ethics and are committed to fostering an environment where employees, officers, directors, contractors and suppliers are aware of and understand their responsibility under this policy. Recognizing the potential for policy violations, how to respond and procedures for reporting are included as a component of employee training.

Policy Oversight

This policy is a supplement to Western's Code of Conduct and other Western policies. Potential violations of this policy must be immediately reported to the General Counsel, who is responsible for communicating such violations to the President and Chief Executive Officer and the Corporation's Board of Directors. The General Counsel is responsible for the administration and interpretation of this policy, and all questions should be referred to the General Counsel.

Reporting Concerns

Western is committed to investigating and addressing concerns for which we are made aware and taking corrective action in response to any violation.

If you would like to report a potential violation of the Corporation's Code of Conduct, policies (including this policy), applicable laws or regulations, you may contact **Western's Compliance and Code of Conduct Hotline at 1-866-895-4113**. This resource is available toll-free 24-hour a day, seven days a week. Western does not tolerate acts of retaliation (including demotion, discipline or discrimination) against any employees, officers or director that raises concerns in good faith.

Dated as of July 31, 2024