# Fighting Against Forced Labour and Child Labour in Supply Chains Act

Report for fiscal year ended 2024



# 1. REPORTING OBLIGATION

Cascades does not tolerate, in any circumstance, human trafficking, slavery, forced labour, corporal punishment or child labour. Recognizing the importance of protecting and promoting fundamental human rights, Cascades has implemented due diligence procedures to prevent and reduce the negative impacts of forced and child labour, both in its facilities and in its supply chain.

This report is issued in accordance with the obligations established by the *Fighting against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c.9 (the "Act") concerning the activities of Cascades Inc. ("Cascades") and its subsidiaries subject to the Act, namely Cascades Canada ULC, Cascades CS+ (2023) Inc., Cascades Holding US Inc., Cascades Transport Inc., Cascades Sonoco Inc., and Greenpac Mill, LLC ("subsidiaries"). Unless the context indicates otherwise, the terms "Cascades", the "Company", or "us" collectively refer to Cascades and its subsidiaries.

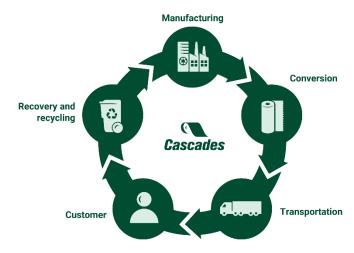
This joint report for all of Cascades is submitted to the Minister of Public Safety and Emergency Preparedness of Canada and encompasses the measures taken by Cascades during the fiscal year ending December 31, 2024 ("2024 financial year"), in order to prevent and reduce the risk that forced labour or child labour is used by the Company or in its supply chains at any stage of the production of goods in or outside of Canada, or during their importation into Canada. When used in this report, the terms "forced labour" and "child labour" have the meanings assigned to them by the Act. Unless otherwise indicated, the data and information presented in this report are current as of May 1, 2025. Cascades' Board of Directors has delegated the responsibility for reviewing and overseeing this report to its Governance, Social Responsibility and Nominating Committee.

### 2. STRUCTURE AND COMMERCIAL ACTIVITIES

Established in 1964, Cascades is the parent company of a North American group of companies involved in the production, conversion and marketing of packaging products and tissue papers principally composed of recycled fibres. As of December 31, 2024, Cascades had nearly 9,700 employees working across its network of 68 production units in Canada and the United States.

With more than half a century of experience in recycling, continuous efforts in research and development, and participatory management as driving forces, Cascades continues to deliver the innovative products that customers have come to rely on, while contributing to the well-being of people, communities and the planet.

Cascades' business model is based on the concept of a circular economy since the Company prioritizes the recovery of residual materials to convert them into new responsible and innovative products.



Today, Cascades is one of the leading collectors of recycled fibres in Canada and a North American leader in sustainable packaging and hygiene solutions.

Cascades' activities are divided into two main business sectors:

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Containerboard Packaging Group Containerboard manufacturer and major corrugated converter in North America.

Specialized Products Group
Manufacturer of industrial packaging and consumer products.

issue.

Tissue Group

Manufacturer and converter of tissue paper for the Away-from-Home and residential markets.

As of December 31, 2024, Cascades' employees and operating facilities were distributed across North America as follows:



# 3. THE SUPPLY CHAINS

Cascades' supply chain is an integral part of its efforts to reduce its environmental impact and to prevent forced labour and child labour. The Company promotes collaboration with suppliers that share its values and are committed to respecting human rights. To meet the needs of its manufacturing, processing and other complementary activities, Cascades' supply chains primarily consist of raw materials, equipment, and machinery. Consequently, the majority of imported goods include paper, chemicals, plastic resin, and other production supplies. All of the Company's direct suppliers are located in North America. As of the end of the 2024 financial year, 56% of the goods and services used in Cascades' supply chains came from the United States, 43.99% from Canada, and 0.01% from Europe.

Cascades' supply chain center of expertise ("Center of Expertise") is a support team whose mission is to provide assistance throughout the Company with the different purchasing steps, both tactical and strategic. The team is composed of buyers who act as contacts for several purchase categories and support the employees in the identification of needs, the preparation of bids, the research and analysis of suppliers, and the negotiation of contracts and purchase orders, all while respecting Cascades' requirements. Suppliers of goods and services managed by the Center of Expertise are designated as preferred for all of Cascades' needs, as the tactical buyers and category managers who maintain business relationships with these suppliers can assist them in their EcoVadis assessment and in implementing resulting improvement measures. For more information, please refer to Section 5: Measures Taken to Identify, Mitigate, and Manage Risk. The operating facilities and the services also have access to pre-established master agreements to proceed with their usual orders and for all operational necessities.

The majority of purchases of goods and services are done through this centralized process, allowing for better control and monitoring of supplier practices. Other buying categories, such as small-scale service contracts, wastepaper, pulp, wood and energy, as well as major capital investments (CAPEX) complete the portrait of the Company's supply chain. The procurement steps for these categories are distinct from one another and vary depending on the specific product or service.

# 4. POLICIES AND DUE DILIGENCE PRACTICES

Cascades recognizes the principles of the Universal Declaration of Human Rights and the Declaration of the International Labour Organization. Cascades also adheres to the Ten Principles of the United Nations Global Compact regarding human rights, international labour norms, environment, and fight against corruption.

### SUSTAINABLE PROCUREMENT POLICY

Sustainable development is an approach that is directly rooted in the Company's values and those of its founders. Since 2010, the Company has outlined its sustainable development approach in a plan that specifies the various areas of intervention, many of which relate to responsible procurement.

The aim is to enable Cascades to work with suppliers who share its values of respect for the environment, its employees and the community, accountability with respect to its products and services, and the transparency of its governance.

#### COMMITMENT ON HUMAN RIGHTS

As previously mentioned, Cascades recognizes the importance of protecting and promoting fundamental human rights. Cascades' commitment on human and labour rights is consistent with its values and its socially responsible management approach. The Company is aware of the role it can play in upholding these rights, both within its facilities and in its supply chain, as well in its business practices and decisions.

#### SUPPLIER CODE OF CONDUCT

Cascades previously invited its suppliers to adhere to the principles of its Code of Ethics and Business Conduct. However, the Company has recently adopted a new Supplier Code of Conduct ("Supplier Code") that outlines Cascades' expectations regarding the conduct of its suppliers, agents, subcontractors, and other business partners. Suppliers are expected to act in accordance with Cascades' approach to respecting human rights, responsible sourcing, and due diligence in the supply chain. The Supplier Code will be integrated into the Company's commercial agreements with its suppliers, and by signing any contract or purchase order containing the Supplier Code, suppliers will accept the provisions and commit to complying with its requirements.

The Supplier Code will be submitted to all suppliers at all levels of Cascades' supply chains, and Cascades will expect its direct suppliers to communicate and enforce these expectations within their own supply chains.

### CODE OF ETHICS AND BUSINESS CONDUCT

The Code of Ethics and Business Conduct (the "Code") always applies, without exception, to all members of the Board of Directors and all Cascades employees (regular, temporary, contractual, full-or part-time). It is required that every employee demonstrates honesty, integrity and equity during the marketing and sale of Cascades' products and services, in the purchase of goods and services as well in general business conduct.

Promoting respect, teamwork, autonomy, and initiative in the work environment are fundamental values for the Company. Considering these values and Cascades' commitment to ethics and compliance excellence in all its business activities, the Code outlines its position and expectations regarding appropriate corporate and individual conduct expected of employees as well as those individuals working on Cascades' behalf.

# TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

The California Transparency in Supply Chains Act requires the retailers and manufacturers doing business in California to provide consumers with information regarding their efforts to eradicate slavery and human trafficking from their direct supply chains. Cascades adheres to and supports the objectives of this act.

# 5. MEASURES TAKEN TO IDENTIFY, MITIGATE AND MANAGE THE RISK

Although the Company has not yet completed a full mapping of its suppliers and an in-depth analysis of these risks, Cascades remains committed to fighting against forced labour and child labour in its operations and supply chains.

### **EVALUATION OF SUPPLIERS**

In order to evaluate the practices of its suppliers, Cascades works with EcoVadis, an independent and recognized firm. The Company wishes to collaborate with suppliers that share its values and whose practices are sustainable and responsible. Cascades regularly proceeds with the evaluation of a targeted number of suppliers chosen based on criteria established at the corporate level.

The assessed suppliers must complete a questionnaire covering a series of criteria grouped into four themes: environment, social practices, ethics, and supply chain. At the end of the assessment, Cascades is able to identify where they stand against market comparables, their strengths and weaknesses, as well as their labour practices and respect for human rights. This biennial evaluation allows Cascades to identify the suppliers at risk.

Cascades favours collaboration rather than a coercive approach. Within this framework, suppliers who do not meet Cascades' expectations will be asked to produce and implement an action plan for improvement and will be assessed once more. If no improvement is observed with respect to these suppliers, Cascades reserves the right to replace them with suppliers focused on sustainability who do meet the expectations.

Furthermore, Cascades reserves the right to terminate any business relationship with a supplier that fails to comply with international human rights and labour conventions and refuses to take steps to improve compliance.

When negotiating its procurement contracts, Cascades' suppliers are asked to adhere to the principles outlined in its Supplier Code and in its Commitment on Human Rights. In these documents, the Suppliers undertake to uphold the laws of the countries in which they operate and to respect human rights. They also affirm that they will not under any circumstances tolerate human trafficking, slavery, forced labour, corporal punishment, or child labour.

#### WITHIN THE ORGANIZATION

The considerations linked to the respect of human rights are an integral part of the strategic decisions taken by Cascades' senior management, such as the update of internal policies, the development of new projects and employee working conditions. The Company considers the risk of forced labour or child labour as a negligible risk within the organization. The standardized recruitment processes ensure Cascades' compliance with labour standards and other applicable laws in effect in North America where the Company's employees are based.

On an annual basis, Cascades' Board of Directors, through its Human Resources Committee, discusses the Company's human resources strategy with senior management. The same committee examines human resources key performance indicators, including the state of labour relations.

Cascades also recognizes employees' rights to freedom of association. Within the Company, about 30% of the active workforce is covered by a collective bargaining agreement that ensures the respect of working conditions negotiated by union groups. Regarding non-unionized units, company committees are in place to allow employees and members of local management to openly discuss and establish their working conditions. These processes are reviewed annually by senior management at Cascades.

Cascades' standardized recruitment process ensures compliance with strict labour law standards, specifically including provisions related to child labour and forced labour, across all its operational sites. In addition to the regular process of compliance with labour laws applicable by jurisdiction where Cascades operates, an automated control measure has been implemented company wide. This measure is embedded in the database system and ensures that an employee's age can never be recorded as under 16 years of age, failing which the hiring process cannot be completed.

The process of recruiting foreign workers is also governed by a pre-employment due diligence verification to confirm that selected candidates hold a valid work permit issued by the Canadian government. While Cascades initiates the process of hiring abroad, the Company is supported by organizations specialized in international recruitment. These organizations are responsible for the initial verification of foreign candidates' documentation, however, Cascades ensures that these verifications meet its standards for preventing forced labour and that the hiring process complies with legal requirements related to immigration and labor law.

### THIRD-PARTY CONFIDENTIAL ETHICS REPORTING

Cascades wishes to promote a culture of integrity and transparency and, to this end, provides its employees and members of the public with a confidential and anonymous reporting mechanism. This allows them to report any violation or breach of the Code of Ethics and Business Conduct. The governance for ethics reporting is managed by the Audit and Finance Committee of the Board of Directors; the committee is informed quarterly, in the form of an anonymized report on the number and scope of all issues that necessitate specific attention.

Any person can report a violation or breach anonymously by phone or via the secured online portal which is accessible via Cascades' public website and its Intranet site.

### **EXTERNAL AUDITS**

Some of Cascades' operating sites are evaluated by independent external auditors, either at clients' requests, or as part of the Company's proactive audit program. These SMETA audits aim to ensure that the Company respects or exceeds the requirements prescribed by applicable laws and the implementation of best practices in terms of labour law, health, safety and fundamental human rights, in connection with the Ethical Trading Initiative's Code of Conduct (ETI). None of the SMETA audits completed at Cascades operating facilities in 2024 showed any serious deficiencies.

# BUSINESS RISK MANAGEMENT

In the normal course of its activities, the Company is exposed to certain risks that could have an impact on its financial position, its operating results, and its cash flow. The Company manages exposure to market and social risk through an enterprise risk management process ("ERM"). This evaluation is carried out annually by the President and Chief Executive Officer, the Vice President and Chief Financial Officer and the Chief of Strategy and Legal Affairs. The Audit and Finance committee of the Board of Directors reviews the results of management's ERM evaluation and approves the identification of the risks and

uncertainties of the Company. Cascades' ERM evaluation conducted in 2024 concluded that none of the significant risks identified are related to forced or child labour. The detailed information concerning the risk factors of the Company are found in the Risk Factors section of the Annual Report.

# 6. EMPLOYEE TRAINING

All employees must follow a mandatory training program during onboarding, one component being the Code of Ethics and Business Conduct of Cascades. This component of the training must be renewed every three years for all employees, regardless of their status or level of responsibility within the Company. Monitoring of training completion is carried out by the human resources managers of each business unit, using a computerized training management system.

Moreover, all the corporate buyers must follow an additional mandatory training program specific on human rights risks in the supply chain. This training must be repeated every five years and aims to raise awareness and educate buyers about these fundamental issues and equip them to better promote and defend human rights with suppliers.

# 7. CONTINUOUS IMPROVEMENT

Although the assessments and audits conducted in 2024 did not identify any materiel or significant risk of forced labour or child labour in its operations and direct supply chains, the Company recognizes that there is no such thing as zero risk. This is why the Company remains committed to a continuous improvement process that goes beyond mere regulatory compliance.

### 8. APPROVAL AND CERTIFICATION

This report has been approved in accordance with subparagraph 11(4)a) of the Act by the Board of Directors of Cascades Inc. This is a joint report of Cascades Inc. and its subsidiaries subject to the Act as indicated in section 1 *Reporting Obligation*, for the fiscal year ended on December 31, 2024.

In accordance with the requirements of the Act, and in particular Article 11, I hereby certify that I have examined the information contained in the report for the entities listed in Section 1. To the best of my knowledge and having exercised due diligence in accordance with industry standards and applicable regulatory requirements, I confirm that the information contained in the report is true, accurate and complete in all significant material respects for the purposes of the Act for the above-mentioned reporting year.

/s/ Hugues Simon

# **Hugues Simon**

Director and President and Chief Executive Officer

I confirm that I have the authority and powers necessary to legally bind Cascades Inc. and all of its subsidiaries covered by this declaration.

Kingsey Falls, the 30th of May 2025