



Domtar Corporation

2025 CDP Corporate Questionnaire 2025

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C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☒ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☒ USD

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☒ Privately owned organization

(1.3.3) Description of organization

Domtar is a leading, privately held manufacturer of diversified forest products, with a workforce of roughly 14,000 employees in more than 60 locations across North America. The company has an annual capacity of 7.2 million metric tons of pulp, paper, packaging and tissue annually, and has an annual production capacity of about 3 billion board feet of lumber and other wood products. Domtar's principal executive office is located in Fort Mill, South Carolina, with offices in Montreal, Quebec and Richmond, British Columbia. The company is owned by Jackson Wijaya. Domtar's vision is to be the global leader in the forest products sector, setting new standards for industry excellence through quality products, transparent practices and strong customer relationships. Our mission is to produce industry-leading forest products with a commitment to our employees, customers and communities, and a dedication to sustainability. Our products are marketed in over 90 countries worldwide and we operate three business units: Paper and Packaging, Pulp and Tissue and Wood Products. Our Paper & Packaging business unit is comprised of 11 integrated pulp and paper mills and supported by converting and manufacturing operations. It produces a wide variety of paper, including office papers, printing and publishing papers, digital and production inkjet papers, technical and specialty papers and converting papers. It also manufactures fully recycled linerboard, corrugated medium packaging materials, fluff pulp and baled market pulp. Our Pulp & Tissue business unit operates 15 facilities, including six pulp mills that produce softwood, recycled bleached kraft and fluff pulp. It also manufactures newsprint and specialty uncoated mechanical papers. Three of our mills produce a range of tissue products for the retail and away-from-home markets, spanning ultra, premium, and value grades. Our Wood Products business unit operates 20 wood products facilities, including 15 sawmills that produce dimension spruce-pine-fir lumber. These sawmills are a major source of wood chips in both Canada and the U.S., as well as dimension lumber and decking. They also generate wood residue used as renewable fuel for electricity and steam production across our operations. In addition, we operate two remanufactured wood products facilities, two engineered wood products facilities and one wood pellet facility. Domtar also manages directly or indirectly 20 million hectares of forest across North America through our woodlands operations. All of these woodlands are third-party certified to independent, internationally recognized forest management standards. We also maintain ISO 14001-certified environmental management systems at all of our woodlands operations. Domtar strives to put sustainability at the heart of everything we do. In May 2025, we released a detailed new roadmap, our 2030 Sustainability Strategy, to guide our sustainability efforts over the next five years. The Strategy is founded on three pillars – Environmental Stewardship, Our People and Communities and Responsible Business – defined in our Sustainability Policy: <https://www.domtar.com/wp-content/uploads/2025/03/GLOBAL-SUSTAINABILITY-POLICY-ENGLISH-March-10-2025-1.pdf> Our three pillars are supported by 12 sustainability objectives that build on our long established commitment to the environment and socioeconomic impact in our operating communities. Each objective is reinforced by a comprehensive program of performance indicators and 2030 targets that demonstrate the level of ambition we are committed to putting into action over the next five years. Our 2026 targets are vital steps toward making our aspirations a reality, several of which are related to forests, climate and water security: 100% of wood and fiber sourced from responsibly managed forests by 2030 Increase landowner engagement in our fiber value chain compared to 2025 on practices that deliver social, environmental and economic value by 2030 Ensure Domtar is recognized as a collaborative partner in advancing the status of critical habitat for threatened species by 2030 Develop a science based policy and monitoring system for assessing biodiversity related risks and opportunities by 2026 Ensure 100% of operations with risks in high value areas have action plans in place within one year of completed assessments by 2030 Advance the development of our Scope 3 GHG emissions inventory by 2026 Establish a science based reduction target for our Scope 1, 2 and 3 GHG emissions by 2026 Be on track to meet our 2035 (or earlier) GHG emissions reduction target by 2030 Reduce water use intensity by 20% over 2020 baseline in the Paper & Packaging business unit by 2030 Ensure 100% of facilities have water related risk mitigation plans in place within one year of completing risk assessments by 2030 Ensure a significant and growing share of innovation related investments support sustainability objectives compared to 2025 by 2030

[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/31/2024

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

☒ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

☒ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

☒ 1 year

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:

☒ 1 year

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:

☒ 1 year

[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

7640000000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

- ☒ Canada
- ☒ United States of America

(1.8) Are you able to provide geolocation data for your facilities?

	Are you able to provide geolocation data for your facilities?	Comment
	Select from: <input checked="" type="checkbox"/> Yes, for all facilities	N/A

[Fixed row]

(1.8.1) Please provide all available geolocation data for your facilities.

Row 1

(1.8.1.1) Identifier

Coosa Pines - Pulp Mill

(1.8.1.2) Latitude

33.32426

(1.8.1.3) Longitude

-86.35827

(1.8.1.4) Comment

Pulp Mill

Row 2

(1.8.1.1) Identifier

Saint-Félicien - Pulp Mill

(1.8.1.2) Latitude

48.74537

(1.8.1.3) Longitude

-72.51472

(1.8.1.4) Comment

Pulp Mill

Row 3

(1.8.1.1) Identifier

Menominee - Recycled Pulp Mill

(1.8.1.2) Latitude

45.10071

(1.8.1.3) Longitude

-87.60965

(1.8.1.4) Comment

Pulp Mill

Row 4

(1.8.1.1) Identifier

Calhoun - Tissue Mill

(1.8.1.2) Latitude

35.30479

(1.8.1.3) Longitude

-84.75228

(1.8.1.4) Comment

Tissue Mill

Row 5

(1.8.1.1) Identifier

Sanford - Tissue Mill

(1.8.1.2) Latitude

28.8036

(1.8.1.3) Longitude

-81.30826

(1.8.1.4) Comment

Tissue Mill

Row 6

(1.8.1.1) Identifier

Hialeah - Tissue Mill

(1.8.1.2) Latitude

25.85758

(1.8.1.3) Longitude

-80.26066

(1.8.1.4) Comment

Tissue Mill

Row 7

(1.8.1.1) Identifier

Atikokan - Sawmill

(1.8.1.2) Latitude

48.76939

(1.8.1.3) Longitude

-91.33598

(1.8.1.4) Comment

Sawmill

Row 8

(1.8.1.1) Identifier

Comtois - Sawmill

(1.8.1.2) Latitude

49.11179

(1.8.1.3) Longitude

-77.15221

(1.8.1.4) Comment

Sawmill

Row 9

(1.8.1.1) Identifier

Glenwood - Sawmill

(1.8.1.2) Latitude

34.33687

(1.8.1.3) Longitude

-93.56248

(1.8.1.4) Comment

Sawmill

Row 10

(1.8.1.1) Identifier

La Doré - Sawmill

(1.8.1.2) Latitude

48.72378

(1.8.1.3) Longitude

-72.62514

(1.8.1.4) Comment

Sawmill

Row 11

(1.8.1.1) Identifier

Maniwaki - Sawmill

(1.8.1.2) Latitude

46.39025

(1.8.1.3) Longitude

-75.99875

(1.8.1.4) Comment

Sawmill

Row 12

(1.8.1.1) Identifier

Opitciwan - Sawmill

(1.8.1.2) Latitude

48.66899

(1.8.1.3) Longitude

-74.93423

(1.8.1.4) Comment

Sawmill

Row 13

(1.8.1.1) Identifier

Saint-Félicien - Sawmill

(1.8.1.2) Latitude

48.64169

(1.8.1.3) Longitude

-72.44397

(1.8.1.4) Comment

Sawmill

Row 14

(1.8.1.1) Identifier

Saint-Thomas - Sawmill

(1.8.1.2) Latitude

48.91421

(1.8.1.3) Longitude

-72.65101

(1.8.1.4) Comment

Sawmill

Row 15

(1.8.1.1) Identifier

Thunder Bay - Sawmill

(1.8.1.2) Latitude

48.35941

(1.8.1.3) Longitude

-89.23343

(1.8.1.4) Comment

Sawmill

Row 16

(1.8.1.1) Identifier

Château-Richer - Sawmill

(1.8.1.2) Latitude

46.95502

(1.8.1.3) Longitude

-71.04239

(1.8.1.4) Comment

Sawmill

Row 17

(1.8.1.1) Identifier

Cross City - Sawmill

(1.8.1.2) Latitude

29.6383

(1.8.1.3) Longitude

-83.14007

(1.8.1.4) Comment

Sawmill

Row 18

(1.8.1.1) Identifier

Girardville - Sawmill

(1.8.1.2) Latitude

49.12675

(1.8.1.3) Longitude

-72.59494

(1.8.1.4) Comment

Sawmill

Row 19

(1.8.1.1) Identifier

Ignace - Sawmill

(1.8.1.2) Latitude

49.42601

(1.8.1.3) Longitude

-91.74352

(1.8.1.4) Comment

Sawmill

Row 20

(1.8.1.1) Identifier

Larouche - Engineered Wood Products

(1.8.1.2) Latitude

48.44357

(1.8.1.3) Longitude

-71.51182

(1.8.1.4) Comment

Engineered Wood Products

Row 21

(1.8.1.1) Identifier

Mistassini - Sawmill

(1.8.1.2) Latitude

48.88007

(1.8.1.3) Longitude

-72.20003

(1.8.1.4) Comment

Sawmill

Row 22

(1.8.1.1) Identifier

Outardes - Sawmill

(1.8.1.2) Latitude

49.17691

(1.8.1.3) Longitude

-68.40572

(1.8.1.4) Comment

Sawmill

Row 23

(1.8.1.1) Identifier

Saint-Prime - Engineered Wood Products

(1.8.1.2) Latitude

48.59204

(1.8.1.3) Longitude

-72.71667

(1.8.1.4) Comment

Engineered Wood Products

Row 24

(1.8.1.1) Identifier

Senneterre - Sawmill

(1.8.1.2) Latitude

48.38544

(1.8.1.3) Longitude

-77.23339

(1.8.1.4) Comment

Sawmill

Row 25

(1.8.1.1) Identifier

Alma - Paper Mill

(1.8.1.2) Latitude

48.56333

(1.8.1.3) Longitude

-71.65227

(1.8.1.4) Comment

Paper Manufacturing

Row 26

(1.8.1.1) Identifier

Dolbeau - Paper Mill

(1.8.1.2) Latitude

48.8809

(1.8.1.3) Longitude

-72.21976

(1.8.1.4) Comment

Paper Manufacturing

Row 27

(1.8.1.1) Identifier

Grenada - Newsprint Mill

(1.8.1.2) Latitude

33.83269

(1.8.1.3) Longitude

-89.81631

(1.8.1.4) Comment

Paper Manufacturing

Row 28

(1.8.1.1) Identifier

Clermont - Newsprint Mill

(1.8.1.2) Latitude

47.69881

(1.8.1.3) Longitude

-70.22448

(1.8.1.4) Comment

Paper Manufacturing

Row 29

(1.8.1.1) Identifier

Gatineau - Newsprint Mill

(1.8.1.2) Latitude

45.47922

(1.8.1.3) Longitude

-75.65056

(1.8.1.4) Comment

Paper Manufacturing

Row 30

(1.8.1.1) Identifier

Kénogami - Paper Mill

(1.8.1.2) Latitude

48.429

(1.8.1.3) Longitude

-71.24388

(1.8.1.4) Comment

Paper Manufacturing

Row 31

(1.8.1.1) Identifier

Normandin - Planer Mill

(1.8.1.2) Latitude

48.82957

(1.8.1.3) Longitude

-72.51678

(1.8.1.4) Comment

Planer Mill

Row 32

(1.8.1.1) Identifier

Talladega - Chip Production Facility

(1.8.1.2) Latitude

33.3686

(1.8.1.3) Longitude

-86.31954

(1.8.1.4) Comment

Chip Production Facility

Row 33

(1.8.1.1) Identifier

Coosa Pines - Cogeneration

(1.8.1.2) Latitude

33.32426

(1.8.1.3) Longitude

-86.35827

(1.8.1.4) Comment

Energy Production - Cogeneration

Row 34

(1.8.1.1) Identifier

Gatineau - Cogeneration

(1.8.1.2) Latitude

45.47922

(1.8.1.3) Longitude

-75.65056

(1.8.1.4) Comment

Energy Production - Cogeneration

Row 35

(1.8.1.1) Identifier

Senneterre - Cogeneration

(1.8.1.2) Latitude

48.38544

(1.8.1.3) Longitude

-77.23339

(1.8.1.4) Comment

Energy Production - Cogeneration

Row 36

(1.8.1.1) Identifier

Dolbeau - Cogeneration

(1.8.1.2) Latitude

48.8809

(1.8.1.3) Longitude

-72.21976

(1.8.1.4) Comment

Energy Production - Cogeneration

Row 37

(1.8.1.1) Identifier

Saint-Félicien - Cogeneration

(1.8.1.2) Latitude

48.74537

(1.8.1.3) Longitude

-72.51472

(1.8.1.4) Comment

Energy Production - Cogeneration

Row 38

(1.8.1.1) Identifier

Hydro-Saguenay - Hydroelectric

(1.8.1.2) Latitude

48.42895

(1.8.1.3) Longitude

-71.24385

(1.8.1.4) Comment

Energy Production - Hydroelectricity Includes seven hydroelectric facilities along the Rivière aux Sables, directly south of the address: Adam-Cunningham, Bésy, Chicoutimi, Chute-aux-Galets, Jim Gray, Jonquière, Murdock-Wilson

Row 39

(1.8.1.1) Identifier

La Doré - Engineered Wood Products

(1.8.1.2) Latitude

48.72378

(1.8.1.3) Longitude

-72.62514

(1.8.1.4) Comment

Engineered Wood Products: Remanufactured wood

Row 40

(1.8.1.1) Identifier

Thunder Bay - Wood Pellet Production Facility

(1.8.1.2) Latitude

48.35941

(1.8.1.3) Longitude

-89.23343

(1.8.1.4) Comment

Wood Pellet Production Facility

Row 41

(1.8.1.1) Identifier

Howe Sound Pulp & Paper Mill

(1.8.1.2) Latitude

49.522485

(1.8.1.3) Longitude

-123.490568

(1.8.1.4) Comment

Pulp Mill

Row 42

(1.8.1.1) Identifier

Crofton Mill

(1.8.1.2) Latitude

48.879131

(1.8.1.3) Longitude

-123.651037

(1.8.1.4) Comment

Pulp Mill

Row 43

(1.8.1.1) Identifier

Meadow Lake Mechanical Pulp Mill

(1.8.1.2) Latitude

54.156827

(1.8.1.3) Longitude

-108.285477

(1.8.1.4) Comment

Pulp Mill

Row 44

(1.8.1.1) Identifier

Port Alberni Mill

(1.8.1.2) Latitude

49.246475

(1.8.1.3) Longitude

-124.81049

(1.8.1.4) Comment

Paper Manufacturing

Row 45

(1.8.1.1) Identifier

Skookumchuck Mill

(1.8.1.2) Latitude

49.915171

(1.8.1.3) Longitude

-115.764151

(1.8.1.4) Comment

Pulp Mill

Row 46

(1.8.1.1) Identifier

Hawesville Mill

(1.8.1.2) Latitude

37.892848

(1.8.1.3) Longitude

-86.692963

(1.8.1.4) Comment

Paper Manufacturing

Row 47

(1.8.1.1) Identifier

Johnsonburg Mill

(1.8.1.2) Latitude

41.49566

(1.8.1.3) Longitude

-78.681329

(1.8.1.4) Comment

Paper Manufacturing

Row 48

(1.8.1.1) Identifier

Marlboro Mill

(1.8.1.2) Latitude

34.623876

(1.8.1.3) Longitude

-79.775393

(1.8.1.4) Comment

Paper Manufacturing

Row 49

(1.8.1.1) Identifier

Nekoosa Mill

(1.8.1.2) Latitude

44.312913

(1.8.1.3) Longitude

-89.898256

(1.8.1.4) Comment

Paper Manufacturing

Row 50

(1.8.1.1) Identifier

Rothschild Mill

(1.8.1.2) Latitude

44.889785

(1.8.1.3) Longitude

-89.625864

(1.8.1.4) Comment

Paper Manufacturing

Row 51

(1.8.1.1) Identifier

Windsor Mill

(1.8.1.2) Latitude

45.564496

(1.8.1.3) Longitude

-71.978684

(1.8.1.4) Comment

Pulp & Paper Mill

Row 52

(1.8.1.1) Identifier

Ashdown Mill

(1.8.1.2) Latitude

33.644578

(1.8.1.3) Longitude

-94.114795

(1.8.1.4) Comment

Pulp Mill

Row 53

(1.8.1.1) Identifier

EAM (Jesup) Facility

(1.8.1.2) Latitude

31.589562

(1.8.1.3) Longitude

-81.912049

(1.8.1.4) Comment

Airlaid nonwoven products facility

Row 54

(1.8.1.1) Identifier

Plymouth Mill

(1.8.1.2) Latitude

35.847204

(1.8.1.3) Longitude

-76.771325

(1.8.1.4) Comment

Pulp Mill

Row 55

(1.8.1.1) Identifier

Rosedale Manufacturing Facility

(1.8.1.2) Latitude

39.079155

(1.8.1.3) Longitude

-94.607805

(1.8.1.4) Comment

Converting Center

Row 56

(1.8.1.1) Identifier

Tatum Converting Center

(1.8.1.2) Latitude

34.639567

(1.8.1.3) Longitude

-79.592339

(1.8.1.4) Comment

Converting Center

Row 57

(1.8.1.1) Identifier

Washington Court House Converting Center

(1.8.1.2) Latitude

39.529984

(1.8.1.3) Longitude

-83.396379

(1.8.1.4) Comment

Converting Center

Row 58

(1.8.1.1) Identifier

West Carrollton Manufacturing Facility

(1.8.1.2) Latitude

39.671695

(1.8.1.3) Longitude

-84.23743

(1.8.1.4) Comment

Converting Center

Row 59

(1.8.1.1) Identifier

Brownsville Converting Center

(1.8.1.2) Latitude

35.601701

(1.8.1.3) Longitude

-89.233228

(1.8.1.4) Comment

Converting Center

Row 60

(1.8.1.1) Identifier

Addison Converting Center

(1.8.1.2) Latitude

41.920362

(1.8.1.3) Longitude

-88.034948

(1.8.1.4) Comment

Converting Center

Row 61

(1.8.1.1) Identifier

DuBois Converting Center

(1.8.1.2) Latitude

41.114649

(1.8.1.3) Longitude

-78.726729

(1.8.1.4) Comment

Converting Center

Row 62

(1.8.1.1) Identifier

Ashland Manufacturing Facility

(1.8.1.2) Latitude

37.72851

(1.8.1.3) Longitude

-77.458712

(1.8.1.4) Comment

Converting Center

Row 63

(1.8.1.1) Identifier

Morristown Manufacturing Facility

(1.8.1.2) Latitude

36.241701

(1.8.1.3) Longitude

-83.219059

(1.8.1.4) Comment

Converting Center

Row 64

(1.8.1.1) Identifier

Phoenix Manufacturing Facility

(1.8.1.2) Latitude

33.447469

(1.8.1.3) Longitude

-112.165179

(1.8.1.4) Comment

Converting Center

Row 65

(1.8.1.1) Identifier

Owensboro Converting Center

(1.8.1.2) Latitude

37.768653

(1.8.1.3) Longitude

-87.081824

(1.8.1.4) Comment

Converting Center

Row 66

(1.8.1.1) Identifier

Rock Hill Converting Center

(1.8.1.2) Latitude

34.939739

(1.8.1.3) Longitude

-80.999834

(1.8.1.4) Comment

Converting Center

Row 67

(1.8.1.1) Identifier

Bayview Fibre

(1.8.1.2) Latitude

49.50637

(1.8.1.3) Longitude

-123.495968

(1.8.1.4) Comment

Log sorting, scaling & chipping facility

Row 68

(1.8.1.1) Identifier

Surrey Distribution Center

(1.8.1.2) Latitude

49.191741

(1.8.1.3) Longitude

-122.903939

(1.8.1.4) Comment

Distribution Center
[Add row]

(1.11) Are greenhouse gas emissions and/or water-related impacts from the production, processing/manufacturing, distribution activities or the consumption of your products relevant to your current CDP disclosure?

Production

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:

☒ Value chain (excluding own land)

(1.11.2) Primary reason emissions and/or water-related impacts from this activity are not relevant

Select from:

☒ Analysis in progress

(1.11.3) Explain why emissions and/or water-related impacts from this activity are not relevant

We've already reduced scope 1 and 2 GHG emissions by over one-third since 2015 across our North American facilities, in addition to completing a company-wide Scope 3 GHG emissions inventory for the calendar year 2023 for all legacy companies. This inventory builds upon the annual Scope 3 reporting of our legacy companies, which has been in place since 2009. Completing a Scope 3 inventory for a newly merged multinational company with more than 60 operations is a significant achievement, and we are currently conducting our 2024 company-wide Scope 3 inventory. In 2025, as part of our Sustainability Strategy, we launched a decarbonization target to be on track to meet our 2035 (or earlier) science-based greenhouse gas emission reduction target established by 2026. Regarding water-related impacts within our value chain, we account for withdrawals, discharges, and consumption across our direct operations. This information is disclosed in the CDP Water module, as we maintain an inventory of how water is managed and processed within our facilities. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments.

Processing/ Manufacturing

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:

☒ Direct operations

Distribution

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:

☒ Direct operations

Consumption

(1.11.1) Relevance of emissions and/or water-related impacts

Select from:

☒ No

(1.11.2) Primary reason emissions and/or water-related impacts from this activity are not relevant

Select from:

☒ Analysis in progress

(1.11.3) Explain why emissions and/or water-related impacts from this activity are not relevant

We've already reduced scope 1 and 2 GHG by over one-third since 2015 across our North American facilities, in addition to completing a company-wide Scope 3 GHG emissions inventory for the calendar year 2023 for all legacy companies. This inventory builds upon the annual Scope 3 reporting of our legacy companies, which has been in place since 2009. Completing a Scope 3 inventory for a newly merged multinational company with more than 60 operations is a significant achievement, and we are currently conducting our 2024 company-wide Scope 3 inventory. In 2025, as part of our Sustainability Strategy, we launched a decarbonization target to be on track to meet our 2035 (or earlier) science-based greenhouse gas emission reduction target established by 2026. Regarding water-related impacts within our value chain, we account for withdrawals, discharges, and consumption across our direct operations. This information is disclosed in the CDP Water module, as we maintain an inventory of how water is managed and processed within our facilities. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments.

[Fixed row]

(1.22) Provide details on the commodities that you produce and/or source.

Timber products

(1.22.1) Produced and/or sourced

Select from:

☒ Produced and sourced

(1.22.2) Commodity value chain stage

Select all that apply

☒ Production

☒ Processing

(1.22.4) Indicate if you are providing the total commodity volume that is produced and/or sourced

Select from:

☒ Yes, we are providing the total volume

(1.22.5) Total commodity volume (metric tons)

12607268.72

(1.22.8) Did you convert the total commodity volume from another unit to metric tons?

Select from:

☒ No

(1.22.11) Form of commodity

Select all that apply

☒ Hardwood logs

☒ Paper

☒ Pulp

☒ Sawn timber, veneer, chips

☒ Softwood logs

(1.22.12) % of procurement spend

Select from:

☒ 81-90%

(1.22.13) % of revenue dependent on commodity

Select from:

☒ 100%

(1.22.14) In the questionnaire setup did you indicate that you are disclosing on this commodity?

Select from:

☒ Yes, disclosing

(1.22.15) Is this commodity considered significant to your business in terms of revenue?

Select from:

☒ Yes

(1.22.19) Please explain

Domtar aims to be the preferred supplier of environmentally-sound products to our customers. We strive to leave the smallest possible footprint in the forest. For products that require virgin fiber, we strive to ensure that this fiber originates from sustainable forests. In previous CDP responses, Domtar has reported volumes in Green Short Tons of Wood Chip Equivalents. In this disclosure, sourced volumes are reported in air dry metric tons (ADMT) of pulp equivalents (the finished pulp equivalent of green short tons of wood chips). For comparison with last year's disclosure, the Green Short Ton Wood Chip Equivalent sourced in 2023 was 12,003,000 tons. We also purchased 1,137,000 tons of boiler fuel, this volume is not included in our disclosure. In addition to virgin fiber, we also procure recovered paper and recycled pulp to produce recycled products and/or virgin fiber products with recycled content. In 2023, we purchased and produced 300,000 ADMT of pulp equivalents from recovered paper. This volume is excluded from the disclosed volume in order to accurately represent our footprint on forests through virgin fiber procurement.

[Fixed row]

(1.23) Which of the following agricultural commodities that your organization produces and/or sources are the most significant to your business by revenue?

Cotton

(1.23.1) Produced and/or sourced

Select from:

☒ No

Dairy & egg products

(1.23.1) Produced and/or sourced

Select from:

☒ No

Fish and seafood from aquaculture

(1.23.1) Produced and/or sourced

Select from:

☒ No

Fruit

(1.23.1) Produced and/or sourced

Select from:

☒ No

Maize/corn

(1.23.1) Produced and/or sourced

Select from:

☒ No

Nuts

(1.23.1) Produced and/or sourced

Select from:

☒ No

Other grain (e.g., barley, oats)

(1.23.1) Produced and/or sourced

Select from:

☒ No

Other oilseeds (e.g. rapeseed oil)

(1.23.1) Produced and/or sourced

Select from:

☒ No

Poultry & hog

(1.23.1) Produced and/or sourced

Select from:

☒ No

Rice

(1.23.1) Produced and/or sourced

Select from:

☒ No

Sugar

(1.23.1) Produced and/or sourced

Select from:

☒ No

Tea

(1.23.1) Produced and/or sourced

Select from:

☒ No

Tobacco

(1.23.1) Produced and/or sourced

Select from:

☒ No

Vegetable

(1.23.1) Produced and/or sourced

Select from:

☒ No

Wheat

(1.23.1) Produced and/or sourced

Select from:

☒ No

Other commodity

(1.23.1) Produced and/or sourced

Select from:

☒ No

[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

- ☒ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

- ☒ Upstream value chain
☒ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

- ☒ Tier 3 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

- ☒ All supplier tiers known have been mapped

(1.24.6) Smallholder inclusion in mapping

Select from:

- ☒ Smallholders relevant and included

(1.24.7) Description of mapping process and coverage

At Domtar, we understand value chain mapping is a critical first step in understanding risks and opportunities within the supply chain, as well as in conducting supplier engagement. To meet our commitments, we must first understand where our fiber originates. At our operations we receive various types of input materials including pulp logs directly from the forest, sawmill residuals in the form of chips, and market pulp from other pulp manufacturers. 100% of our value chain is mapped, in that we understand who the suppliers are, where they operate, and have a logical understanding of where they are sourcing from, if not full visibility supported by evidence. For 60% of our supply, we have direct visibility to the production unit. For 35% percent of our supply, we have visibility to the sourcing area within a specified radius at a level suitable to determine a homogenous risk level. For the remaining 5% of our supply, we have visibility to the country of origin. At our operations, we have a robust system for receiving material inputs which logs each delivery in relation to a specific supplier, contract and location. Within this system

we are able to report, assess and understand our value chain from a supplier, geography and risk perspective. Where relevant, we also account for jurisdictional differences within geographies, such as variations in provincial or state-level emissions, forestry and water legislation. 100% of our raw material sources are third-party assessed through the FSC Controlled Wood standards to ensure they are low risk as defined by FSC. Additionally, where possible, we prioritize certified materials.

[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

	Plastics mapping	Primary reason for not mapping plastics in your value chain	Explain why your organization has not mapped plastics in your value chain
	Select from: <input checked="" type="checkbox"/> No, and we do not plan to within the next two years	Select from: <input checked="" type="checkbox"/> Not an immediate strategic priority	Overall low risk.

[Fixed row]

(1.24.2) Which commodities has your organization mapped in your upstream value chain (i.e., supply chain)?

Timber products

(1.24.2.1) Value chain mapped for this sourced commodity

Select from:
☒ Yes

(1.24.2.2) Highest supplier tier mapped for this sourced commodity

Select from:
☒ Tier 3 suppliers

(1.24.2.3) % of tier 1 suppliers mapped

Select from:

☒ 100%

(1.24.2.4) % of tier 2 suppliers mapped

Select from:

☒ 100%

(1.24.2.5) % of tier 3 suppliers mapped

Select from:

☒ 100%

(1.24.2.7) Highest supplier tier known but not mapped for this sourced commodity

Select from:

☒ All supplier tiers known have been mapped for this sourced commodity

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Domtar's short term horizon of up to one year for climate, forest and water related risks is linked to both transitional and physical risks that could affect our operations, supply chains and compliance costs. These risks have been identified through our enterprise risk management (ERM) process, which is coordinated annually by our Internal Audit team. Each fall our management team identifies the most material risks and related mitigation actions and are incorporated into both our strategic and financial planning cycles. As part of this process, we have also completed a Double Materiality Assessment (DMA) to ensure that both financial impacts and broader environmental and social impacts are systematically considered in prioritizing risks and opportunities. Both the ERM framework and the DMA evaluate risks by likelihood and potential magnitude of impact including financial implications such as increased operating costs, capital expenditure requirements and potential revenue shifts. Identified risks directly inform the development of the annual audit plan and influence decisions around capital allocation, resource prioritization and operational resilience measures. This ensures that short-term climate, forest and water-related risks are systematically integrated into our planning and decision-making, supporting both risk mitigations and long-term value creation.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Domtar's medium-term horizon (1-5 years) focuses on generating value for the company while supporting our operating communities and contributing to broader environmental and social benefits. Our success supports community economic growth and prosperity, social well-being and advancement, as well as shared environmental benefit. Our public targets guide the continuous improvement of our operations, including measurable reductions in GHG emissions. These targets are embedded into operational strategic development plans and directly linked to the implementation of GHG reduction projects such as energy efficiency upgrades, fuel-switching initiatives and renewable energy sourcing. From a financial perspective, these projects are evaluated for future capital allocation and investment decisions. Anticipated policy developments as carbon pricing are also factored into financial forecasts to ensure resilience. Our annual enterprise risk management (ERM) process in addition to the completed Double Materiality Assessment (DMA) incorporates medium term risks and opportunities with mitigation plans tracked against this time horizon.

Long-term

(2.1.1) From (years)

5

(2.1.2) Is your long-term time horizon open ended?

Select from:

☒ No

(2.1.3) To (years)

10

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Domtar's long term horizon (5-10 years) is defined by our growth strategy which prioritizes value creation in all three Business Units (Wood Products, Pulp and Tissue and Paper and Packaging), disciplined capital allocation and product innovation, while responsibly transitioning away from mature product markets, expanding its presence in long-term growth markets operating a competitive portfolio of manufacturing assets and enhancing financial performance in a sustainable way over the long run. Over this timeframe, both transitional risks and physical risks are being assessed to ensure resilience of our business model. From a financial perspective our capital allocation strategy integrates long term climate considerations in relation to major asset investments with long life cycles. We have completed a Double Materiality Assessment (DMA) to evaluate potential financial impacts risks and opportunities to help inform these investment decisions. Strategically our long-term planning includes expanding into growth markets modernizing our manufacturing assets and aligning with climate commitments that extend beyond 2030.

[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☒ Forests

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☒ Dependencies

☒ Impacts

☒ Risks

☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☒ Direct operations

☒ Upstream value chain

☒ Downstream value chain

☒ End of life management

(2.2.2.4) Coverage

Select from:

☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ Annually

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

- ☒ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

- ☒ Enterprise Risk Management

International methodologies and standards

- ☒ IPCC Climate Change Projections
- ☒ ISO 14001 Environmental Management Standard

Databases

- ✓ Nation-specific databases, tools, or standards

Other

- ✓ Materiality assessment
- ✓ Partner and stakeholder consultation/analysis
- ✓ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- ✓ Drought
- ✓ Flood (coastal, fluvial, pluvial, ground water)
- ✓ Heavy precipitation (rain, hail, snow/ice)

Chronic physical

- ✓ Changing precipitation patterns and types (rain, hail, snow/ice)
- ✓ Changing temperature (air, freshwater, marine water)

Policy

- ✓ Changes to international law and bilateral agreements
- ✓ Increased difficulty in obtaining operations permits
- ✓ Uncertainty and/or conflicts involving land tenure rights and water rights

Market

- ✓ Availability and/or increased cost of certified sustainable material
- ✓ Changing customer behavior

Reputation

- ✓ Increased partner and stakeholder concern and partner and stakeholder negative feedback
- ✓ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

Technology

- ☒ Unsuccessful investment in new technologies

Liability

- ☒ Exposure to litigation
- ☒ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- | | |
|-----------------------------------------------|--------------------------------------------------------|
| <input checked="" type="checkbox"/> NGOs | <input checked="" type="checkbox"/> Local communities |
| <input checked="" type="checkbox"/> Customers | <input checked="" type="checkbox"/> Indigenous peoples |
| <input checked="" type="checkbox"/> Employees | |
| <input checked="" type="checkbox"/> Investors | |
| <input checked="" type="checkbox"/> Suppliers | |

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- ☒ Yes

(2.2.2.16) Further details of process

The Domtar strategic working group continues its analysis of the climate-focused scenario analysis done in 2023 and the impacts, risks and opportunities found in the Double Materiality Assessment (DMA) with a focus on assessing the impact of climate change on our forest operations in Canada and the United States. These insights are integrated into Domtar's 20-25 year forest management (FM) plans which are updated every five years in collaboration with governments and stakeholders. Our FM plans serve as long term strategic tools, guiding both operational practices and financial planning by ensuring the security of our fiber supply, protecting biodiversity and maintaining market access through sustainable sourcing commitments. To safeguard biodiversity and long-term forest productivity, we implement strategies such as identifying protected areas, applying progressive harvesting practices, retaining nesting trees, establishing riparian green belts and ensuring natural and planted regeneration. In coordination with provincial governments, we also identify critical habitats for species such as the woodland caribou to minimize disturbance and maintain compliance with conservation regulations. From a financial planning perspective, sustainable forest management reduces the risk of regulatory non-compliance, secures long term access to global markets that increasingly require FSC certified fiber and mitigates potential costs associated with deforestation regulations such as the EUDR.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☒ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☒ Dependencies

☒ Impacts

☒ Risks

☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☒ Direct operations

☒ Upstream value chain

☒ Downstream value chain

☒ End of life management

(2.2.2.4) Coverage

Select from:

☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- ☒ Annually

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

- ☒ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

- ☒ Enterprise Risk Management

Databases

- ☒ Nation-specific databases, tools, or standards

Other

- ☒ External consultants
- ☒ Jurisdictional/landscape assessment
- ☒ Materiality assessment
- ☒ Partner and stakeholder consultation/analysis
- ☒ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- ☒ Drought
- ☒ Flood (coastal, fluvial, pluvial, ground water)
- ☒ Heavy precipitation (rain, hail, snow/ice)
- ☒ Other acute physical risk, please specify :Climate change

Chronic physical

- ☒ Changing precipitation patterns and types (rain, hail, snow/ice)
- ☒ Changing temperature (air, freshwater, marine water)
- ☒ Water availability at a basin/catchment level
- ☒ Water stress
- ☒ Water quality at a basin/catchment level

Policy

- ☒ Carbon pricing mechanisms

Market

- ☒ Changing customer behavior

Reputation

- ☒ Impact on human health
- ☒ Increased partner and stakeholder concern and partner and stakeholder negative feedback

☒ Stigmatization of sector

Technology

☒ Dependency on water-intensive energy sources

☒ Transition to lower emissions technology and products

Liability

☒ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☒ NGOs

☒ Customers

☒ Employees

☒ Investors

☒ Suppliers

☒ Regulators

☒ Local communities

☒ Indigenous peoples

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☒ Yes

(2.2.2.16) Further details of process

Domtar's strategic working group uses the climate-focused scenario analysis and the material climate impacts, risks and opportunities found in the Double Materiality Assessment (DMA) to continue its assessments on the potential climate impacts across our business units. Analysis is ongoing but key details are already incorporated into our global carbon strategy and our broader financial planning processes. For example, our findings have identified immediate operational efficiency projects to help shape our annual capital budget. In the medium term (1-5 years) we are evaluating the payback periods of major decarbonization projects and influence procurement strategies. In the long term (5+ years) the scenario analysis is applied to stress test our business model, helping us anticipate carbon pricing trajectories, evaluate potential exposure to physical risks at key sites and avoid stranded asset risks. These reductions have been achieved through capital investments in fuel switching, renewable energy sourcing and energy efficiency all of which are evaluated against financial criteria and aligned with our strategic objective of long-term operational resilience. Longer term we feel we are positioned favorably as we have met the guidance and recommendations as we are in scope for the CSRD. As part of the due diligence for the CSRD we completed a Double Materiality Assessment (DMA) to prepare for its disclosures on Governance,

Strategies, Actions and Plans for our most material climate impacts, risks and opportunities. This ensures our stakeholders see how the scenario analysis, risk identification and long-term resilience planning are systematically embedded into our strategic and financial decision-making processes.

Row 3

(2.2.2.1) Environmental issue

Select all that apply

☒ Biodiversity

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☒ Impacts

☒ Risks

☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☒ Direct operations

☒ Upstream value chain

(2.2.2.4) Coverage

Select from:

☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- ☒ Qualitative only

(2.2.2.8) Frequency of assessment

Select from:

- ☒ Annually

(2.2.2.9) Time horizons covered

Select all that apply

- ☒ Short-term
- ☒ Medium-term

(2.2.2.10) Integration of risk management process

Select from:

- ☒ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- ☒ Site-specific

(2.2.2.12) Tools and methods used

Other

- ☒ External consultants
- ☒ Materiality assessment
- ☒ Partner and stakeholder consultation/analysis

(2.2.2.13) Risk types and criteria considered

Chronic physical

☒ Declining ecosystem services

Reputation

☒ Increased partner and stakeholder concern and partner and stakeholder negative feedback

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☒ NGOs

☒ Customers

☒ Employees

☒ Investors

☒ Suppliers

☒ Regulators

☒ Local communities

☒ Indigenous peoples

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☒ Yes

(2.2.2.16) Further details of process

We set up a strategic working group to continue tackling climate-focused scenario analysis in 2023. The group has focused on assessing the forest impacts of climate change on our woodlands operations in Canada and the United States. In addition, Domtar prepares 20- or 25-year FM plans that are updated every five years in collaboration with government and other stakeholders, as well as strategies to safeguard biodiversity. The latter includes identification of protected areas, implementation of selected management practices (such as partial or progressive cuts, retention of trees for nesting, buffering around eagle nests and leaving riparian green belts), and natural and planted forest regeneration. In coordination with provincial governments, Domtar seeks to identify critical habitat areas for species of interest, such as the woodland caribou. Our goal is to ensure that our forest management plans protect such areas and minimize disturbance to the populations in question. Domtar conducted a review to determine the operational sites owned, leased and managed in – or adjacent to – protected areas and areas of high biodiversity value outside protected areas. As the vast majority of the woodlands we own or manage are located in Canada, this review was limited to forest management units (FMUs) in Quebec and Ontario. When considering forest management units along with adjacent protected areas, 43% of the total area we manage (25.1 million acres or 10.1 million hectares) is under regulated or non-regulated protection. Regulated protection includes nature reserves, national parks, wilderness

areas, protected areas and other designations classified under the International Union for Conservation of Nature (IUCN) system, and recognized by international bodies like the United Nations. Nonregulated protection covers other measures that contribute to the conservation of biodiversity, including reserves, candidate lands for protected areas, wetlands, species-at risk deferrals, and less productive forest areas that are not classified under the IUCN system.

Row 4

(2.2.2.1) Environmental issue

Select all that apply

☒ Water

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☒ Dependencies

☒ Impacts

☒ Risks

☒ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☒ Direct operations

☒ Upstream value chain

☒ Downstream value chain

☒ End of life management

(2.2.2.4) Coverage

Select from:

☒ Full

(2.2.2.5) Supplier tiers covered

Select all that apply

☒ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☒ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☒ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☒ Short-term

☒ Medium-term

☒ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☒ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☒ Site-specific

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☒ WRI Aqueduct

Enterprise Risk Management

- ✓ Enterprise Risk Management

International methodologies and standards

- ✓ IPCC Climate Change Projections
- ✓ ISO 14001 Environmental Management Standard

Other

- ✓ External consultants
- ✓ Materiality assessment
- ✓ Partner and stakeholder consultation/analysis
- ✓ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- ✓ Drought
- ✓ Flood (coastal, fluvial, pluvial, ground water)
- ✓ Heavy precipitation (rain, hail, snow/ice)

Chronic physical

- ✓ Water stress
- ✓ Declining water quality
- ✓ Temperature variability
- ✓ Increased severity of extreme weather events
- ✓ Changing temperature (air, freshwater, marine water)
- ✓ Changing precipitation patterns and types (rain, hail, snow/ice)

Policy

- ✓ Increased pricing of water

Market

- ✓ Changing customer behavior

Reputation

- ☒ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology

- ☒ Dependency on water-intensive energy sources
- ☒ Transition to water intensive, low carbon energy sources

Liability

- ☒ Exposure to litigation

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- | | |
|-----------------------------------------------|------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> NGOs | <input checked="" type="checkbox"/> Regulators |
| <input checked="" type="checkbox"/> Customers | <input checked="" type="checkbox"/> Local communities |
| <input checked="" type="checkbox"/> Employees | <input checked="" type="checkbox"/> Indigenous peoples |
| <input checked="" type="checkbox"/> Investors | <input checked="" type="checkbox"/> Other water users at the basin/catchment level |
| <input checked="" type="checkbox"/> Suppliers | |

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- ☒ Yes

(2.2.2.16) Further details of process

The Domtar strategic working group continues its analysis from the climate-focused scenario analysis done in 2023 and the impacts risks and opportunities found in the Double Materiality Assessment (DMA) to yield detailed assessments of potential climate impacts across all of our locations. Analysis of the results is ongoing but insights from these assessments are already being incorporated in our global carbon and water strategies. Our efforts currently focus on our most strategic operation regions including facilities in the Lac-Saint-Jean region of Quebec where hydroelectricity from our dams' powers some of our mills. Water related risks such as flooding, variation in precipitation and seasonal water availability are explicitly considered in our operational planning and financial decision making. In the short-term scenario findings inform site specific mitigation measures, capital allocation for flood defenses and adjustments to prosecution scheduling. In the medium term they guide investments in water management infrastructure, energy sourcing strategies and process efficiency initiatives. Over the long term these insights support

strategic decision regarding the location, design and operation of mills ensuring resilience against water-related physical risks and continuity of operations while protecting associated revenue streams.

[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☒ Yes

(2.2.7.2) Description of how interconnections are assessed

We assess interconnections between climate related risks and opportunities through quantitative and qualitative analysis using our climate scenario analysis and our Double Materiality Assessment (DMA), evaluating material environmental impacts, risks and opportunities. In 2023, we retained a consultant to support a quantitative analysis of the climate-related physical risks for all of our facilities. As part of the risk analysis structures and procedures, the scenario analysis is also employed to consider the potential water-related impacts on pulp, paper and tissue mills over the medium- and long-terms through 2040, as our manufacturing processes are dependent on significant amounts of water. We undertake qualitative risk assessments to consider water quantity and quality risks in the regions and countries where our products are produced. We also perform long-term assessments through forest management planning, given the criticality of wood availability and forest resilience to our business. Additionally, the Double Materiality Assessment (DMA) highlighted these interconnections with impact, risk and opportunity statements explicitly identifying the linkages across climate, energy, water and forest resources. The species mix and geographic distribution of Canadian forests will be affected by climate change. These potential impacts are considered and estimated with help from government research and factored into the 25-year harvest plans Domtar drafts for the forests we manage directly and indirectly. These 25-year forest management plans include optimal habitat scheduling, which identifies areas where optimal harvesting sequences can be carried out over a span of 100 to 150 years.

[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☒ Yes, we have identified priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

- ☒ Direct operations
- ☒ Upstream value chain

(2.3.3) Types of priority locations identified

Sensitive locations

- ☒ Areas of limited water availability, flooding, and/or poor quality of water

Locations with substantive dependencies, impacts, risks, and/or opportunities

- ☒ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to forests
- ☒ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water
- ☒ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to biodiversity

(2.3.4) Description of process to identify priority locations

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario.

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

- ☒ Yes, we will be disclosing the list/geospatial map of priority locations

(2.3.6) Provide a list and/or spatial map of priority locations

WRI-Aqueduct-Water-Stress-Analysis-2025-CDP.docx
[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

- ☒ Qualitative
- ☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

- ☒ Direct operating costs

(2.4.3) Change to indicator

Select from:

- ☒ Absolute increase

(2.4.5) Absolute increase/ decrease figure

50000000

(2.4.6) Metrics considered in definition

Select all that apply

- ☒ Time horizon over which the effect occurs
- ☒ Likelihood of effect occurring

(2.4.7) Application of definition

Domtar defines substantive financial and strategic risks as those materially affecting direct operations, resulting in an impact on the company's financial condition, financial results, or the ability to operate one of our facilities. These risks may influence our capacity to meet financial obligations and expose us to broad operational, compliance, and reputational challenges. In practice, we apply our Enterprise Risk Management (ERM) and Double Materiality Assessment (DMA) processes to assess the likelihood and magnitude of potential effects. In our DMA risks are generally considered substantive when the probability of occurrence is 25-50% and the expected impact on direct operating costs is \$35-70 million within the relevant time horizon (short, medium, or long term). This reflects our ERM scoring framework,

which evaluates impacts across financial, operational, reputational, employee, and compliance dimensions. Beyond quantitative thresholds, we also recognize that some risks may be material due to their qualitative nature even when precise cost estimates are not available. Examples include flooding or drought that could prevent the operation of a facility, unacceptable compliance costs, significant changes to fiber supply, or major shifts in policy and regulatory requirements. Substantive risks may also arise from long-term strategic drivers such as demand trends in our industry, public policy developments, changes to consumption habits, or global macroeconomic pressures.

Opportunities

(2.4.1) Type of definition

Select all that apply

- ☒ Qualitative
- ☒ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

- ☒ Direct operating costs

(2.4.3) Change to indicator

Select from:

- ☒ Absolute decrease

(2.4.5) Absolute increase/ decrease figure

50000000

(2.4.6) Metrics considered in definition

Select all that apply

- ☒ Time horizon over which the effect occurs
- ☒ Likelihood of effect occurring

(2.4.7) Application of definition

Domtar defines substantive financial and strategic opportunities as those materially enhancing our ability to maintain or improve operations at one of our facilities, strengthen our financial condition or results, or reduce exposure to broad risks. Such opportunities help us preserve or enhance our capacity to meet obligations and support long-term resilience. We use qualitative considerations such as the ability to increase resilience, improve regulatory compliance positioning, strengthen reputation and stakeholder confidence, or foster innovation and sustainable growth as reasons for pursuing opportunities. Examples of substantive opportunities include process efficiency gains that lower energy or water consumption, investments that provide access to more resilient natural resources, proactive alignment with public policy developments, or increased demand for certified sustainable products that enhance market access
[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:

☒ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

Our manufacturing processes require the use of chemicals to accentuate pulp brightness, treat effluent, and maintain pH balance. Because chemical use is central to environmental stewardship and worker safety, it is considered material for both internal and external stakeholders. Chemical suppliers are required to meet our health, safety, and environmental requirements when transporting, delivering, and handling substances. Facilities are audited under our environmental risk and compliance program every three years. Each mill also defers to the requirements of its environmental permit for monitoring obligations and discharge limits. Because mills operate in different watersheds, monitoring requirements vary by site. Risk reduction plays a central role in determining which chemicals are selected for use in the manufacturing process, including consideration of the optimal chemical state (i.e., liquid, gas, or solid) of particularly dangerous or toxic substances. Representatives from Operations and Environment jointly assess new chemicals to evaluate potential effects on employees, risks to health and safety, and impacts on effluent treatment plants. Some chemicals have been banned entirely due to their toxicity, although this is not required by law, while other substances have been chosen specifically to reduce risk and mitigate environmental impacts. Inventories are carefully tracked to quickly identify spills and abnormal consumption. Chemical management is also verified as part of our three-year environmental risk and compliance audit cycle. These indicators (chemical state, toxicity, effluent treatment impacts, and inventory tracking for spills/abnormal consumption) ensure that chemicals with higher environmental or health risks are identified and managed appropriately, while supporting the safe and efficient operation of our facilities.
[Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:

☒ Nitrates

(2.5.1.2) Description of water pollutant and potential impacts

Because wood naturally contains very low levels of nitrogen compounds, process waters from pulp and paper production also carry minimal nitrogen emissions. We do not report nitrates separately from nitrogen oxides (NO₂), as they are quantified together with other nitrogen compounds during measurement.

(2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☒ Resource recovery

☒ Water recycling

☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements

(2.5.1.5) Please explain

At Domtar, we take a structured, top-down approach to environmental management rooted in compliance, continuous improvement, and local accountability. In 2025, we introduced a companywide Environmental Policy, endorsed by business unit presidents, to reinforce our commitment to all applicable environmental laws, regulations, and voluntary commitments. About 90% of our manufacturing and woodlands operations are ISO 14001 certified, and every facility operates under an environmental management system with site-specific targets, risk mitigation, and measurable progress. Facility environment coordinators oversee compliance and performance, while corporate teams guide strategy and track key indicators such as water use, providing a basis for measuring and evaluating success across operations. Water stewardship is central to our efforts. All water we withdraw undergoes primary and secondary effluent treatment before reuse or return to the

environment. Because pulp and papermaking is water-intensive, we prioritize reuse: in 2024, about 94% of water was returned, with the remaining 6% incorporated into products or lost to evaporation. We evaluate success through continuous monitoring of treatment plant performance, analysis of discharge data, and public reporting through platforms such as CDP to ensure transparency and demonstrate progress toward our water-stewardship goals. Looking ahead, our 2030 targets include requiring water risk mitigation plans at all manufacturing sites.

Row 2

(2.5.1.1) Water pollutant category

Select from:

☒ Phosphates

(2.5.1.2) Description of water pollutant and potential impacts

Pulp, paper and tissue mills produce large volumes of wastewater and residual sludge waste; water used in the manufacturing process absorbs phosphorus, which can cause increased growth of algae and large aquatic plants, which may result in decreased levels of dissolved oxygen— a process called eutrophication. Total phosphorus is measured in our treatment plants as water passes through primary and secondary effluent treatment.

(2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☒ Resource recovery

☒ Beyond compliance with regulatory requirements

☒ Industrial and chemical accidents prevention, preparedness, and response

(2.5.1.5) Please explain

At Domtar, we take a structured, top-down approach to environmental management rooted in compliance, continuous improvement, and local accountability. In 2025, we introduced a companywide Environmental Policy, endorsed by business unit presidents, to reinforce our commitment to all applicable environmental laws, regulations, and voluntary commitments. About 90% of our manufacturing and woodlands operations are ISO 14001 certified, and every facility operates under an environmental management system with site-specific targets, risk mitigation, and measurable progress. Facility environment coordinators oversee compliance and

performance, while corporate teams guide strategy and track key indicators such as water use, providing a basis for measuring and evaluating success across operations. Water stewardship is central to our efforts. All water we withdraw undergoes primary and secondary effluent treatment before reuse or return to the environment. Because pulp and papermaking is water-intensive, we prioritize reuse: in 2024, about 94% of water was returned, with the remaining 6% incorporated into products or lost to evaporation. We evaluate success through continuous monitoring of treatment plant performance, analysis of discharge data, and public reporting through platforms such as CDP to ensure transparency and demonstrate progress toward our water-stewardship goals. Looking ahead, our 2030 targets include requiring water risk mitigation plans at all manufacturing sites.

Row 3

(2.5.1.1) Water pollutant category

Select from:

☒ Other nutrients and oxygen demanding pollutants

(2.5.1.2) Description of water pollutant and potential impacts

High biological oxygen demand (BOD) is harmful to ecosystems, as fish and other aquatic life may suffocate in oxygen-depleted waters. BOD can also cause odors and discoloration.

(2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☒ Resource recovery

☒ Beyond compliance with regulatory requirements

☒ Industrial and chemical accidents prevention, preparedness, and response

(2.5.1.5) Please explain

At Domtar, we take a structured, top-down approach to environmental management rooted in compliance, continuous improvement, and local accountability. In 2025, we introduced a companywide Environmental Policy, endorsed by business unit presidents, to reinforce our commitment to all applicable environmental laws, regulations, and voluntary commitments. About 90% of our manufacturing and woodlands operations are ISO 14001 certified, and every facility operates under an

environmental management system with site-specific targets, risk mitigation, and measurable progress. Facility environment coordinators oversee compliance and performance, while corporate teams guide strategy and track key indicators such as water use, providing a basis for measuring and evaluating success across operations. Water stewardship is central to our efforts. All water we withdraw undergoes primary and secondary effluent treatment before reuse or return to the environment. Because pulp and papermaking is water-intensive, we prioritize reuse: in 2024, about 94% of water was returned, with the remaining 6% incorporated into products or lost to evaporation. We evaluate success through continuous monitoring of treatment plant performance, analysis of discharge data, and public reporting through platforms such as CDP to ensure transparency and demonstrate progress toward our water-stewardship goals. Looking ahead, our 2030 targets include requiring water risk mitigation plans at all manufacturing sites.

[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

Forests

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

Water

(3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

Plastics

(3.1.1) Environmental risks identified

Select from:

☒ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Not an immediate strategic priority

(3.1.3) Please explain

Plastics, though an important consideration, is not currently material to our business or to the footprint our business has on the environment. Compared to climate and forests, plastics are a very small aspect of our operations, and as a result, are currently identified as not an immediate strategic priority. Domtar does recognize the importance of plastics from a social and environmental perspective and will work towards understanding our risk exposure and opportunity for positive impact in the short term.

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☒ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Canada

(3.1.1.9) Organization-specific description of risk

The majority of Domtar's Canadian facilities are covered under an industrial emitter carbon program or are subject to a fuel charge. These programs increase operational costs and negatively impact cash flows at the regulated facilities. The facilities in British Columbia and Saskatchewan are subject to a provincial Output-Based Pricing System (OBPS) that sets emissions intensity performance thresholds for large emitters. The facilities in Quebec are subject to the Quebec-California cap-and-trade market that allocates emission allowances to facilities. In all cases facilities that are at or below their performance benchmark or emissions allocations may bank or sell credits, while facilities above the benchmark must purchase credits or pay a fee per tonne of CO₂e owed. Facilities in Quebec not subject to the cap and trade are subject to a carbon costs applied on fossil fuel consumption, as well as woodlands operations and transportation. Only the three facilities in Ontario are not subject to a carbon cost at this time.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

☒ Medium-term

☒ The risk has already had a substantive effect on our organization in the reporting year

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ Virtually certain

(3.1.1.14) Magnitude

Select from:

☒ Medium

(3.1.1.15) Effect of the risk on the financial position, financial performance and cash flows of the organization in the reporting year

High impact on cash flows, especially due to projected rising costs of carbon.

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

High impact on cash flows especially due to projected rising costs of carbon.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

(3.1.1.18) Financial effect figure in the reporting year (currency)

23212506

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

28027063

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

28027063

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

160937908

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

(3.1.1.25) Explanation of financial effect figure

Since carbon emission pricing systems have come into effect in BC (2008), Québec (2013) and Saskatchewan (2019), our operational costs have increased (consolidated across the business unit) due to direct compliance costs or indirect carbon costs applied on fossil fuel consumption, as well as woodland operations and transportation. Financial implications were estimated to be more than C\$23 million in 2024, with a projected rising curve over the next few years. The potential financial impact over the next six years is now evaluated at C\$60 million. For facilities subject to an OBPS, cost estimates are based on credits owed or generated in the reporting year. Forecasts conservatively do not consider planned projects and assume no change in emissions while applying the forecasted increase in carbon price. For facilities in the Quebec-California cap-and-trade program, forecasted fuel consumption and production information are used to determine compliance obligations, to which forecasted increase in carbon price are applied.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☒ Increase investment in R&D

(3.1.1.27) Cost of response to risk

31000000

(3.1.1.28) Explanation of cost calculation

This figure represents the costs incurred for implementing GHG emissions reduction projects over the last five years. This is the sum of project-specific capital expenses for projects that are currently undergoing implementation or have already been implemented.

(3.1.1.29) Description of response

To respond to the imperative to reduce our greenhouse gas emissions and reduce carbon compliance costs, we implemented GHG reduction projects across numerous facilities in Canada. The business units identify mill-specific GHG emission reduction opportunities and projects, which are compiled and prioritized within the business unit. Projects are prioritized by the management team based on several factors including market conditions, costs and return on investment, and opportunity to reduce carbon compliance costs. In 2024, we achieved emission reductions through several projects in Quebec and British Columbia, including projects for thermal power plant optimization with advanced control logic at the sites, enabling centralized coordination of equipment that maximize steam generation from biomass & reduced fossil fuel use, maximize turbine power generation and energy recovery from dirty steam, optimize boiler operation, minimize heat losses etc. Another project resulted in some emission reductions through upgrading lime kiln instrumentation. Collectively, these projects cost over C\$25 million in investments

and resulted in annual GHG emission reductions over 13 kt of CO₂e. Several other projects at different sites are currently ongoing implementation, with projected annual CO₂ reductions of 51k tons and C\$6 million in investments.

Forests

(3.1.1.1) Risk identifier

Select from:

☒ Risk2

(3.1.1.2) Commodity

Select all that apply

☒ Timber products

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Wildfires

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Canada

☒ United States of America

(3.1.1.9) Organization-specific description of risk

Our operations and suppliers in Canada and the United States are subject to climate variations, which impact the frequency and severity of wildfires, affecting adversely or positively timber production and fiber sourcing. Changes in precipitation resulting in droughts could make wildfires more frequent or more severe, and could adversely affect Domtar's timber supply or hydroelectric production. In our Canadian operations, access to woodlands can be difficult and forest fires can go undetected due to low population density in forested areas. Many of Domtar's operations are located in remote areas. On top of the protection costs, the real impact for Domtar is a reduction in the annual allowable harvest resulting from forest fires, as well as the extra costs the company may incur to salvage burnt wood, such as road construction, sorting poorer wood quality and displacing woodland operations. Productivity and efficiency of harvest teams and the sawmills operations may also be affected. In 2024, 103,725 hectares (approx. 256,310 acres) of forest were affected by fires in Domtar's supply zone in Canada where our sawmills source mostly from Domtar's managed forests (82%). The area was much larger in 2023 (over 1,5M ha), impacting our operations over the long term.

(3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Disruption in upstream value chain

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Medium-term
- ☒ The risk has already had a substantive effect on our organization in the reporting year

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- ☒ Very likely

(3.1.1.14) Magnitude

Select from:

- ☒ High

(3.1.1.15) Effect of the risk on the financial position, financial performance and cash flows of the organization in the reporting year

Cost related to the loss of forest management operations capacity, infrastructure, machinery, roundwood supply for our sawmills, sawmills efficiency and supervision.

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Cost related to the loss of forest productivity on the long term and therefore to the wood annual allowable cut in our permits.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

(3.1.1.18) Financial effect figure in the reporting year (currency)

16527075

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

51500000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

418000000

(3.1.1.25) Explanation of financial effect figure

One method for estimating the potential financial impact of forest fires is described in "The Costs and Losses of Wildfires A Literature Review" (available online: <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.1215.pdf>). Costs are estimated to be about C\$390/ha. With 1.073 million hectares of owned or managed land affected by forest fires based on 2024, the cost to Domtar is theoretically equivalent to C\$418 million - the maximum financial impact we identified above. That said, as woodlands under our stewardship are primarily located in Canada where 94% of forests are publicly owned, a significant portion of this risk, including immediate direct costs, belongs to Canadian public authorities, which are passed on to Domtar and other stakeholders indirectly. For comparison, in Canada, the total area that burns annually varies widely from year to year, but averages about 2.5 million hectares; fire suppression costs over the last decade have ranged from about C\$500 million to C\$1 billion a year (source: <http://www.nrcan.gc.ca/forests/fire-insects-disturbances/fire/13143>). Using the industry's annual 2020 gross domestic product of C\$25 billion (Natural Resources Canada, 2022) to assume Domtar's share of the risk at around 7% (based on our 2023 economic impact in Canada of C\$1.7 B), the potential, hypothetical financial impact to Domtar in Canada is estimated to be approximately C\$70 million (US\$51.5 million), the minimum impact above.

(3.1.1.26) Primary response to risk

Engagement

- ☒ Engage with regulators/policy makers

(3.1.1.27) Cost of response to risk

100000

(3.1.1.28) Explanation of cost calculation

Fire suppression costs over the last decade in Canada have ranged from about C\$500 million to C\$1 billion a year (source: <http://www.nrcan.gc.ca/forests/fire-insectsdisturbances/fire/13143>). A significant portion of these costs are assumed by Canadian public authorities. In Quebec, SOPFEU is responsible for optimizing forest fire protection to ensure the sustainability of the forest environment and surrounding communities. Domtar's General Director of Woodland Operations, co-chaired SOPFEU's board of directors throughout 2024. We estimate Domtar's contributions through his involvement at around C\$90,000. In Ontario, the ministry of Natural Resources and Forestry (MNRF) maintains a system of firefighting resources to allow appropriate responses to wildfire. We included C\$10,000 for indirect involvement.

(3.1.1.29) Description of response

In Quebec, SOPFEU is responsible for optimizing forest fire protection to ensure the sustainability of the forest environment and surrounding communities. The organization is supported by the provincial government and was co-chaired by Domtar's General Director of Woodland Operations, throughout 2024. In Ontario, the ministry of Natural Resources and Forestry (MNRF) maintains a system of firefighting resources to allow appropriate responses to wildfire. This system includes a number of fire bases and response centers as well as aircraft and equipment. The Wildland Fire Management Strategy (2024) provides direction for how the MNRF manages wildland fire across Ontario.

Water

(3.1.1.1) Risk identifier

Select from:

- ☒ Risk6

(3.1.1.3) Risk types and primary environmental risk driver

Policy

- ☒ Increased difficulty in obtaining operations permits

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ Canada

(3.1.1.7) River basin where the risk occurs

Select all that apply

☒ Saguenay (Riviere)

(3.1.1.9) Organization-specific description of risk

Domtar's operations consume substantial amounts of energy. Our water risk comes from the generation of electricity at our hydroelectricity facilities. There can be no certainty that Domtar will be able to maintain the water rights necessary for its hydroelectric power generating facilities or to renew such rights or power sales contracts on favorable conditions. The closure of certain machines or facilities located in Quebec could trigger the exercise of termination of rights by the Quebec government under water rights agreements. The amount of electricity Domtar can generate at its hydroelectric facilities is also subject to the volume of rain or snow fall and is therefore variable from one year to the next. The water rights agreements required to operate some of these facilities typically range from 10 to 50 years. In some cases, the agreements are contingent on the continued operation of the related paper mills and a minimum level of capital spending in the region.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased direct costs

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

☒ The risk has already had a substantive effect on our organization in the reporting year

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ Very unlikely

(3.1.1.14) Magnitude

Select from:

☒ Medium-low

(3.1.1.15) Effect of the risk on the financial position, financial performance and cash flows of the organization in the reporting year

Impact on costs of corporate risk assessments to assess the magnitude of the risk on strategic operating regions.

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Changes could impact needed capital expenditures.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

(3.1.1.18) Financial effect figure in the reporting year (currency)

24000000

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

120000000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

(3.1.1.25) Explanation of financial effect figure

Our hydroelectric generation and transmission network which consists of seven generating stations with 170 MW of capacity. The output is consumed internally or sold under contract to third parties. This allows us to reduce our costs by generating energy internally at a lower cost compared to open market purchases. The hydroelectric output capacity is 170 MW and available for internal consumption. We estimate that the approximate annualized cost savings to our operations attributable to internal consumption from our hydroelectric facilities is 24 million to 28.5 million.

(3.1.1.26) Primary response to risk

Engagement

☒ Engage with regulators/policy makers

(3.1.1.27) Cost of response to risk

10000000

(3.1.1.28) Explanation of cost calculation

Engagement with regulators and policymakers is undertaken as part of our public affairs program. In addition to the costs associated with this engagement, our hydroelectric dams incur annual operating costs, on which this approximate figure is based.

(3.1.1.29) Description of response

Domtar is committed to building solid relationships with a broad range of stakeholders by maintaining ongoing outreach and developing strategic partnerships through a variety of formal and informal channels, including regulators and policymakers. Our focus is on ensuring we have a voice in public policy discussions that impact company operations and employees, as well as engaging and supporting our operating communities and partners across North America. In 2022, we renewed five agreements with the Quebec government for the following dams: Jim-Gray, Adam Cunningham, Murdock-Wilson, Lac Onatchiway and Chute-aux-Galets.

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

☒ OPEX

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

160937908

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ 100%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ 100%

(3.1.2.7) Explanation of financial figures

This figure represents compliance costs for mills that are registered to the carbon pricing systems (direct costs), or through carbon costs applied on fossil fuel consumption for facilities below the threshold. For woodlands operations and transportation, we consider these indirect costs, as the carbon cost is charged to our operations from fuel wholesalers. However, we have included in this figure.

Forests

(3.1.2.1) Financial metric

Select from:

☒ Liabilities

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

51500000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ 100%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

418000000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ 100%

(3.1.2.7) Explanation of financial figures

For physical risks, our method for estimating the potential financial impact of forest fires is described in "The Costs and Losses of Wildfires A Literature Review" (available online: <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.1215.pdf>). Costs are estimated to be about C\$390/ha. With 1.073 million hectares of owned or managed land affected by forest fires based on 2024, the cost to Domtar is theoretically equivalent to C\$418 million - the maximum financial impact we identified in section 3.1.1. That said, as woodlands under our stewardship are primarily located in Canada where 94% of forests are publicly owned, a significant portion of this risk, including immediate direct costs, belongs to Canadian public authorities, which are passed on to Domtar and other stakeholders indirectly. For comparison, in Canada, the total area that burns annually varies widely from year to year, but averages about 2.5 million hectares; fire suppression costs over the last decade have ranged from about C\$500 million to C\$1 billion a year (source: <http://www.nrcan.gc.ca/forests/fire-insects-disturbances/fire/13143>). Using the industry's annual 2020 gross domestic product of C\$25 billion (Natural Resources Canada, 2022) to assume Domtar's share of the risk at around 7% (based on our 2024

economic impact in Canada of C1.7 B), the potential, hypothetical financial impact to Domtar in Canada is estimated to be approximately C\$70 million (US\$51.5 million), the financial impact included on this line item as a transition risk.

Water

(3.1.2.1) Financial metric

Select from:

☒ OPEX

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

28500000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ 100%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ 100%

(3.1.2.7) Explanation of financial figures

Access to water is critical for our pulp, paper, and tissue operations, as mills rely on nearby water sources for production and steam generation. Our hydroelectric generation and transmission network, consisting of seven stations with 170 MW of capacity, supplies electricity for internal use or contracted sales. By generating

power internally at lower cost than market purchases, we achieve estimated annual savings of 24 to 28.5 million. However, because this network depends on a reliable water supply, changes in water availability through denied permit access could increase operational costs and disrupt production.
[Add row]

(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?

Row 1

(3.2.1) Country/Area & River basin

United States of America

☒ Other, please specify :Wisconsin River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

2

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☒ 1-10%

(3.2.11) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario.

Row 2

(3.2.1) Country/Area & River basin

United States of America

☒ Roanoke River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☒ 1-10%

(3.2.11) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario.

Row 3

(3.2.1) Country/Area & River basin

United States of America

☒ Other, please specify :Wisconsin River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

2

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☒ 1-10%

(3.2.11) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario.

Row 4

(3.2.1) Country/Area & River basin

United States of America

☒ Other, please specify :City of Sanford

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☒ 1-10%

(3.2.11) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario.

Row 5

(3.2.1) Country/Area & River basin

Zimbabwe

☒ Other, please specify :Onsite groundwater wells at our West Carrollton (Ohio) facility.

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☒ 1-10%

(3.2.11) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario.

[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations	Fines, enforcement orders, and/or other penalties	Comment
	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Enforcement orders or other penalties	The total number of water-related enforcement orders, penalties, and fines received in 2024 is US\$83,675.

[Fixed row]

(3.3.2) Provide details for all significant fines, enforcement orders and/or other penalties for water-related regulatory violations in the reporting year, and your plans for resolving them.

Row 1

(3.3.2.1) Type of penalty

Select from:

☒ Other penalty type, please specify :Administrative monetary penalty

(3.3.2.2) Financial impact

0

(3.3.2.3) Country/Area & River basin

Canada

☒ Other, please specify :Kootenay River

(3.3.2.4) Type of incident

Select from:

☒ Spillage, leakage or discharge of potential water pollutant

(3.3.2.5) Description of penalty, incident, regulatory violation, significance, and resolution

Domtar's Skookumchuck, British-Columbia, mill received an inspection report from the Ministry of Environment and Climate Change Strategy covering April 2024–December 2025. The findings are being referred for an Administrative Monetary Penalty (AMP) related to a water pollution event (spillage, leakage, or discharge). The mill had previously received an AMP for a trout toxicity failure.

Row 2

(3.3.2.1) Type of penalty

Select from:

☒ Other penalty type, please specify :Notice of violation

(3.3.2.2) Financial impact

0

(3.3.2.3) Country/Area & River basin

Zimbabwe

☒ Other, please specify :West Carrollton, Montgomery County, Ohio.

(3.3.2.4) Type of incident

Select from:

☒ Spillage, leakage or discharge of potential water pollutant

(3.3.2.5) Description of penalty, incident, regulatory violation, significance, and resolution

Domtar's West Carrollton, Ohio, facility received a Notice of Violation/Resolution of Violation from the Ohio Environmental Protection Agency following a break in the effluent discharge line that caused an unauthorized discharge to state waters in January 2024.

Row 4

(3.3.2.1) Type of penalty

Select from:

☒ Other penalty type, please specify :Warning letter

(3.3.2.2) Financial impact

0

(3.3.2.3) Country/Area & River basin

Zimbabwe

☒ Other, please specify :Alberni inlet

(3.3.2.4) Type of incident

Select from:

☒ Spillage, leakage or discharge of potential water pollutant

(3.3.2.5) Description of penalty, incident, regulatory violation, significance, and resolution

Domtar's Port Alberni, British-Columbia, mill received a Warning Letter from Fisheries and Oceans Canada in April 2024, related to a violation of the Fisheries Act for a fish mortality event. The case was closed without further enforcement action.

Row 5

(3.3.2.1) Type of penalty

Select from:

☒ Enforcement order

(3.3.2.2) Financial impact

64650

(3.3.2.3) Country/Area & River basin

Zimbabwe

☒ Other, please specify :Holston River, South Fork, Tennessee

(3.3.2.4) Type of incident

Select from:

☒ Spillage, leakage or discharge of potential water pollutant

(3.3.2.5) Description of penalty, incident, regulatory violation, significance, and resolution

Domtar's Kingsport, Tennessee, mill received a Director's Order and Assessment from the Tennessee Department of Environment and Conservation for wastewater permit exceedances and water quality violations in early 2023. The order included civil penalties, damages, and corrective requirements.

Row 6

(3.3.2.1) Type of penalty

Select from:

☒ Other penalty type, please specify :Notice of violation

(3.3.2.2) Financial impact

0

(3.3.2.3) Country/Area & River basin

Zimbabwe

☒ Other, please specify :Pee Dee River

(3.3.2.4) Type of incident

Select from:

☒ Spillage, leakage or discharge of potential water pollutant

(3.3.2.5) Description of penalty, incident, regulatory violation, significance, and resolution

Domtar's Marlboro, South Carolina, mill received a Notice of Violation from the South Carolina Department of Environmental Services in May 2024 for exceedance of the fecal coliform limit in wastewater discharge. The violation may be subject to further enforcement action.

Row 7

(3.3.2.1) Type of penalty

Select from:

☒ Other penalty type, please specify :Notice of violation

(3.3.2.2) Financial impact

0

(3.3.2.3) Country/Area & River basin

Zimbabwe

☒ Other, please specify :Holston River, South Fork, Tennessee

(3.3.2.4) Type of incident

Select from:

☒ Spillage, leakage or discharge of potential water pollutant

(3.3.2.5) Description of penalty, incident, regulatory violation, significance, and resolution

Domtar's Kingsport, Tennessee, mill received a Notice of Violation by the Tennessee Department of Environment & Conservation in September 2024 following a stormwater and wastewater inspection. Alleged deficiencies included solids build-up, effluent discoloration, debris management, stormwater sheen, and outdated testing procedures. A corrective action plan was requested.

Row 8

(3.3.2.1) Type of penalty

Select from:

☒ Fine

(3.3.2.2) Financial impact

19025

(3.3.2.3) Country/Area & River basin

Canada

☒ Other, please specify :Georgia Strait

(3.3.2.4) Type of incident

Select from:

- ☒ Spillage, leakage or discharge of potential water pollutant

(3.3.2.5) Description of penalty, incident, regulatory violation, significance, and resolution

Domtar's Crofton, BC mill received the final Determination of Administrative Penalty (Determination) for C\$25,500 (\$19,025 USD @ 1 CAD = 0.75 USD) for two spill incidents that occurred on July 23, 2021 (failed expansion joint caused discharge of 1.0 M liters of effluent, stormwater and sea water to marine environment) and August 7, 2021 (pump failure caused discharge of 6 K liters of effluent to marine environment).

[Add row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

- ☒ Yes

(3.5.1) Select the carbon pricing regulation(s) which impact your operations.

Select all that apply

- ☒ Québec CaT - ETS ☒ Other carbon tax, please specify :**Quebec carbon tax**
- ☒ Ontario EPS - ETS
- ☒ Saskatchewan OBPS - ETS
- ☒ Canada federal fuel charge
- ☒ Canada federal Output Based Pricing System (OBPS) - ETS

(3.5.2) Provide details of each Emissions Trading Scheme (ETS) your organization is regulated by.

Canada federal OBPS - ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

12

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

01/01/2024

(3.5.2.4) Period end date

12/31/2024

(3.5.2.5) Allowances allocated

0

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

258554

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.10) Comment

No additional comment

Ontario EPS - ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

1

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

01/01/2024

(3.5.2.4) Period end date

12/31/2024

(3.5.2.5) Allowances allocated

0

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

31471

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.10) Comment

No additional comment

Québec CaT - ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

13

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

01/01/2024

(3.5.2.4) Period end date

12/31/2024

(3.5.2.5) Allowances allocated

0

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

330842

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.10) Comment

No additional comment

Saskatchewan OBPS - ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

3

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

01/01/2024

(3.5.2.4) Period end date

12/31/2024

(3.5.2.5) Allowances allocated

0

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.10) Comment

No additional comment
[Fixed row]

(3.5.3) Complete the following table for each of the tax systems you are regulated by.

Canada federal fuel charge

(3.5.3.1) Period start date

01/01/2024

(3.5.3.2) Period end date

12/31/2024

(3.5.3.3) % of total Scope 1 emissions covered by tax

1

(3.5.3.4) Total cost of tax paid

1108684

(3.5.3.5) Comment

Starting April 1, 2019, the federal fuel charge applied to all Domtar-owned sawmills, woodlands operations and transportation in Ontario. Emissions from Domtar sawmills are reported as part of our scope 1 emissions disclosure, whereas woodlands operations and transportation fall under the scope 3 category. Based on the fuel consumption of our Ontario sawmills and using an estimation of the fuel used by woodlands operators and transportation-related costs, the overall fuel charge in 2024 was estimated to be around C\$ 4.5 million, including C\$ 1.5 million under scope 1.

Other carbon tax, please specify

(3.5.3.1) Period start date

01/01/2024

(3.5.3.2) Period end date

12/31/2024

(3.5.3.3) % of total Scope 1 emissions covered by tax

1

(3.5.3.4) Total cost of tax paid

764767

(3.5.3.5) Comment

Under Quebec jurisdiction, other carbon taxes apply when fuel suppliers transfer their cap-and-trade costs to their customers. Therefore, Quebec fuel charges apply to all Domtar operations not directly targeted by the cap-and-trade system, including wood product facilities, woodlands operations and transportation in Quebec. Emissions from wood product facilities are reported as part of the company's scope 1 emissions, whereas woodlands operations and transportation fall under the scope 3 category. Based on the fuel consumption of our Quebec wood product facilities and using an estimation of the fuel used by woodlands operators and transportation-related costs, the overall fuel charge in 2024 was estimated to be around USD 13 million, including USD 700,000 under scope 1.
[Fixed row]

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

Domtar's strategy to meet the requirements of the various regulatory carbon pricing program varies by jurisdiction. Across the company, Domtar continues to assess our asset base and identify opportunities for capital expenditures for asset modernization, including installation of new technological advancements. We continue to focus on energy efficiency initiatives that reduce our energy use and carbon footprint. Through R&D efforts, we continue to research and trial technologies that are suitable to displace fossil fuels combusted in our processes. Domtar is focused on energy efficiency projects to reduce natural gas use (primary source of GHG emissions) and uses available carbon markets to meet future compliance obligations. Our Carbon Committee addressed topics concerning emerging climate and carbon pricing initiatives as well as regulatory requirements and their potential impact on our strategies and business operations. As a newly consolidated company, we are beginning to take a more coordinated approach and leveraging the best practices, know-how, and resources to develop an even more efficient and cost-effective strategy to comply with carbon pricing program requirements.

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental opportunities identified
Climate change	Select from: <input checked="" type="checkbox"/> Yes, we have identified opportunities, and some/all are being realized
Forests	Select from: <input checked="" type="checkbox"/> Yes, we have identified opportunities, and some/all are being realized
Water	Select from: <input checked="" type="checkbox"/> Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp4

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Use of renewable energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Canada

(3.6.1.8) Organization specific description

Domtar's ability to reduce non-biogenic carbon emissions through energy-efficient alternatives, including self-produced renewable energy (biomass and hydroelectricity) could help the company comply with regulatory standards and ultimately result in cost savings. Domtar's own production could also be sold to new markets, generating new income streams.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Reduced direct costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

☒ Medium-term

☒ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☒ Medium

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

We estimate the effect on financial position to come from our improved climate performance, securing capital and entry into new markets. Our improved performance comes from the reduction in energy expenses and revenue growth through renewable energy service agreements. We have a lower risk regulatory penalties tied to GHG emission use.

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Domtar's use of energy-efficient alternatives and the decrease of carbon emissions from self-produced renewable energy may have cost benefits. Domtar mills generate an equivalent of 65% of their energy needs from renewable energy. Considering the appetite for renewable energy is growing based on regulatory and societal pressures, Domtar is well positioned for a growing market. The financial opportunity of using self-produced renewable energy results in reduced energy expenditures (OpEx) and potential increase in revenue from selling surplus energy is approximately \$137M.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

137993710

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

137993710

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

137993710

(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

137993710

(3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

689968550

(3.6.1.23) Explanation of financial effect figures

Domtar's use of energy-efficient alternatives and the decrease of carbon emissions from self-produced renewable energy have cost benefits. Domtar mills generate an equivalent of 65% of their energy needs from renewable energy. Considering the appetite for renewable energy is growing based on regulatory and societal pressures, Domtar is well positioned for a growing market. The financial opportunity of using self-produced renewable energy results in reduced energy expenditures (OpEx) and potential increase in revenue from selling surplus energy over the medium term is approximately US\$689M.

(3.6.1.24) Cost to realize opportunity

100000

(3.6.1.25) Explanation of cost calculation

The costs to realize this opportunity are associated with the management for the maintenance of our renewable assets and administration to set up purchase agreements.

(3.6.1.26) Strategy to realize opportunity

Domtar's commitment to climate action is focused on green energy and exploring ways to enhance our overall energy efficiency. Optimizing the use of renewable energy sources such as hydroelectricity and biomass while reducing consumption of fossil fuels is a key element of our strategy to improve our carbon footprint.

Forests

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.2) Commodity

Select all that apply

☒ Timber products

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☒ Increased demand for certified and sustainable materials

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Upstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Canada

(3.6.1.8) Organization specific description

Trees are one of the most versatile and renewable resources. Not only is wood the most sustainable building material, it is energy-efficient and cost-effective. Wood products, as well as books, magazines and other durable paper products, store the carbon that began in the forest, and the recycling of paper avoids the methane emissions that occur at landfills. Domtar's commitment to producing quality products that meet the criteria of today's environmentally conscious stakeholders begins with responsible fiber sourcing. Forest certification and fiber tracking help to ensure the sustainability of our fiber supply and other forest values, including biodiversity and ecosystem conservation. Strict adherence to internationally recognized forest management and chain of custody (CoC) standards provides our customers with

the assurance that the wood fiber we utilize originates from responsible sources. Third-party-verified forest certification standards provide us with a competitive edge by providing our customers with the assurance that our forests are managed responsibly according to rigorous standards. We are among the largest holders of SFI and FSC certificates in North America. In 2024, 100% of the forests we manage were certified to the SFI Forest Management Standard. In addition, we maintain FSC Forest Management certification on 35% of this land area (17.5 million acres).

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term
☒ Medium-term
☒ Long-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- ☒ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

- ☒ High

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Demand for certified products will only continue to grow due to consumer demand as well as market and regulatory forces. Our long-term commitments include maintaining internationally recognized forest management standards at 100% of Domtar-managed woodlands, as well as CoC certification at 100% of our manufacturing facilities. We have also fulfilled our 2026 target by increasing externally sourced fiber that is third-party certified to more than 75%.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

(3.6.1.24) Cost to realize opportunity

5000000

(3.6.1.25) Explanation of cost calculation

Strict adherence to internationally recognized forest management and chain of custody (CoC) standards provide our customers with the assurance that the wood fiber we utilize originates from responsible sources. This approach is deeply embedded throughout the company and our operations, rendering the cost of response a difficult one to evaluate monetarily. Developing fiber tracking systems, implementing certification, undertaking audits and monitoring best practices are not tracked specifically, but together exceed 5 million annually.

(3.6.1.26) Strategy to realize opportunity

Our adherence to third-party-verified certification standards gives us an important competitive edge. It provides our customers with the assurance that our forests are managed responsibly and sustainably according to rigorous standards developed specifically for local forest conditions.

Water

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Use of renewable energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ Canada

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☒ Saguenay (Riviere)

(3.6.1.8) Organization specific description

Access to water is crucial for our pulp, paper and tissue operations, which is why our mills are located alongside bodies of water. Steam and electrical power constitute the primary forms of energy used in pulp, paper and tissue production; process steam is produced in boilers using a variety of fuel sources, as well as heat recovery units in mechanical pulp facilities. All of our operating sites generate 100% of their own steam requirements. In 2023, our Alma, Coosa Pines, Dolbeau, Gatineau, Kénogami, and Saint-Félicien operations also collectively consumed close to two thirds of their electrical requirements from internal sources, including hydroelectric dams. We purchased the balance of our electrical energy needs from third parties. In addition to providing a reliable water supply, water is the foundation of our hydroelectric generation and transmission network, Hydro-Saguenay in the Saguenay-Lac-Saint-Jean region of Quebec, which provides the company with access to electricity via seven generating stations with 170 MW of capacity. The water rights agreements required to operate our hydroelectric facilities typically range from 10 to 25 years.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Reduced direct costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

☒ Medium-term

☒ Long-term

☒ The opportunity has already had a substantive effect on our organization in the reporting year

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

☒ High

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

We estimate that the approximate annualized cost savings to our operations attributable to internal consumption from our hydroelectric facilities is between 24 million and 28.5 million.

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

We anticipate the annualized cost savings to our operations attributable to internal consumption from our hydroelectric facilities and assets to be high.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

24000000

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

24000000

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

28500000

(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

120000000

(3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

285000000

(3.6.1.21) Anticipated financial effect figure in the long-term - minimum (currency)

285000000

(3.6.1.22) Anticipated financial effect figure in the long-term – maximum (currency)

427500000

(3.6.1.23) Explanation of financial effect figures

We estimate that the approximate annualized cost savings to our operations attributable to internal consumption from our hydroelectric facilities is between 24 million and 28.5 million. We have forecasted this based on 5, 10 and 15 year horizons using the current annualized impact.

(3.6.1.24) Cost to realize opportunity

100000000

(3.6.1.25) Explanation of cost calculation

Engagement with regulators and policymakers is undertaken as part of our public affairs program. In addition to the costs associated with this engagement, our hydroelectric dams incur annual operating costs, on which this approximate figure is based.

(3.6.1.26) Strategy to realize opportunity

Domtar's commitment to climate action is focused on green energy and exploring ways to enhance our overall energy efficiency. Optimizing the use of renewable energy sources such as hydroelectricity while reducing consumption of fossil fuels, is a key element of our strategy to improve our carbon footprint.

[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

☒ OPEX

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

137993710

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 100%

(3.6.2.4) Explanation of financial figures

Domtar mills, generate an equivalent of 65% of their energy needs from renewable energy. Considering the appetite for renewable energy is growing based on regulatory and societal pressures, Domtar is well positioned for a growing market. The financial opportunity of using self-produced renewable energy results in reduced energy expenditures (OpEx) and potential increase in revenue from selling surplus energy is approximately US\$137M.

Forests

(3.6.2.1) Financial metric

Select from:

☒ Revenue

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

2510000000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 100%

(3.6.2.4) Explanation of financial figures

Trees are one of the most versatile and renewable resources. Not only is wood the most sustainable building material, it is energy-efficient and cost-effective. Wood products, as well as books, magazines and other durable paper products, store the carbon that began in the forest, and the recycling of paper avoids the methane emissions that occur at landfills. Domtar's commitment to producing quality products that meet the criteria of today's environmentally conscious stakeholders begins with responsible fiber sourcing. Forest certification and fiber tracking help to ensure the sustainability of our fiber supply and other forest values, including biodiversity and ecosystem conservation. Strict adherence to internationally recognized forest management and chain of custody (CoC) standards provide our customers with the assurance that the wood fiber we utilize originates from responsible sources. Third-party-verified forest certification standards provide us with a competitive edge by providing our customers with the assurance that our forests are managed responsibly according to rigorous standards. We are among the largest holders of SFI and FSC certificates in North America. In 2024, 100% of the forests we manage were certified to the SFI Forest Management Standard. In addition, we maintain FSC Forest Management certification on 35% of this land area (17.5 million acres).

Water

(3.6.2.1) Financial metric

Select from:

☒ OPEX

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

28500000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 1-10%

(3.6.2.4) Explanation of financial figures

Access to water is crucial for our pulp, paper and tissue operations, which is why our mills are located alongside bodies of water. Steam and electrical power constitute the primary forms of energy used in pulp, paper and tissue production; process steam is produced in boilers using a variety of fuel sources, as well as heat recovery units in mechanical pulp facilities. All of our operating sites generate 100% of their own steam requirements. In 2023, our Alma, Coosa Pines, Dolbeau, Gatineau, Kénogami, and Saint-Félicien operations also collectively consumed close to two thirds of their electrical requirements from internal sources, notably through hydroelectric dams. We purchased the balance of our electrical energy needs from third parties. In addition to providing a reliable water supply, water is the foundation of our hydroelectric generation and transmission network, Hydro-Saguenay in the Saguenay–Lac-Saint-Jean region of Quebec, which provides the company with access to electricity via seven generating stations with 170 MW of capacity. Our 7 power generation assets have a total installed capacity of 440 MW. The water rights agreements required to operate our hydroelectric facilities typically range from 10 to 25 years.

[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☒ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☒ More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☒ Executive directors or equivalent

☒ Non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☒ No

[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Forests	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☒ Director on board

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets
- ☒ Approving corporate policies and/or commitments
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The overall responsibility for Domtar's Sustainability Strategy and performance resides with the Global Sustainability Steering Committee (GSSC), which has been delegated this role by the Management Board. The GSSC is an integrated, executive-level governance body with representation from the Management Board and senior leadership, including business unit (BU) leaders. The GSSC is supported by the global sustainability team, which oversees the implementation of the sustainability-related policies, led by the Global Chief Sustainability Officer, who reports to the Management Board. Domtar operates through its three BUs: Paper & Packaging, Pulp & Tissue, and Wood Products in North America. With the support of the global sustainability team, each BU sustainability committee is tasked with implementing the Policy Statement and related strategy at the BU level. The committees are cross-functional groups of senior managers and subject-matter experts.

Forests

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Director on board

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☒ Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☒ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☒ Overseeing the setting of corporate targets

☒ Monitoring progress towards corporate targets

☒ Approving corporate policies and/or commitments

☒ Overseeing reporting, audit, and verification processes

☒ Monitoring compliance with corporate policies and/or commitments

☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The overall responsibility for Domtar's Sustainability Strategy and performance resides with the GSSC, which has been delegated this role by the Management Board. The GSSC is an integrated executive-level governance body with representation from the Management Board and senior leadership, including business unit (BU) leaders. The GSSC is supported by the global sustainability team, which oversees the implementation of the sustainability-related policies, led by the Global Chief Sustainability Officer, who reports to the Management Board. Domtar operates through its three BUs: Paper & Packaging, Pulp & Tissue, and Wood Products in North America. With the support of the global sustainability team, each BU sustainability committee is tasked with implementing the Policy Statement and related strategy at the BU level. The committees are cross-functional groups of senior managers and subject-matter experts.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☒ Director on board

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☒ Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☒ Scheduled agenda item in some board meetings – at least annually

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☒ Overseeing the setting of corporate targets

☒ Monitoring progress towards corporate targets

☒ Approving corporate policies and/or commitments

☒ Overseeing reporting, audit, and verification processes

☒ Monitoring compliance with corporate policies and/or commitments

☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The overall responsibility for Domtar's Sustainability Strategy and performance resides with the GSSC, which has been delegated this role by the Management Board. The GSSC is an integrated executive-level governance body with representation from the Management Board and senior leadership, including business unit (BU) leaders. The GSSC is supported by the Global Sustainability team, which oversees the implementation of the sustainability-related policies, led by the global chief sustainability officer, who reports to the Management Board. Domtar operates through its three BUs: Paper & Packaging, Pulp & Tissue, and Wood Products in

North America. With the support of the Global Sustainability team, each BU sustainability committee is tasked with implementing the Policy Statement and related strategy at the BU level. The committees are cross-functional groups of senior managers and subject-matter experts.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☒ Director on board

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☒ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☒ Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☒ Sporadic – agenda item as important matters arise

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☒ Overseeing the setting of corporate targets

☒ Monitoring progress towards corporate targets

☒ Approving corporate policies and/or commitments

☒ Overseeing reporting, audit, and verification processes

☒ Monitoring compliance with corporate policies and/or commitments

☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The overall responsibility for the Domtar's Sustainability Strategy and performance resides with the GSSC, which has been delegated this role by the Management Board. The GSSC is an integrated executive-level governance body with representation from the Management Board and senior leadership, including business unit (BU) leaders. The GSSC is supported by the global sustainability team, which oversees the implementation of the sustainability-related policies, led by the Global Chief Sustainability Officer, who reports to the Management Board. Domtar operates through its three BUs: Paper & Packaging, Pulp & Tissue, and Wood Products in North America. With the support of the global sustainability team, each BU sustainability committee is tasked with implementing the Policy Statement and related strategy at the BU level. The committees are cross-functional groups of senior managers and subject-matter experts.

[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues

Forests

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues
- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☒ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- ☒ Consulting regularly with an internal, permanent, subject-expert working group
- ☒ Engaging regularly with external stakeholders and experts on environmental issues

- ☒ Integrating knowledge of environmental issues into board nominating process
- ☒ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- ☒ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Forests	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Conducting environmental scenario analysis

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The Global Chief Sustainability Officer reports directly to the Management Board, meeting with members of the board regularly and frequently.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The Global Chief Sustainability Officer reports directly to the Management Board, meeting with members of the board regularly and frequently.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Conducting environmental scenario analysis

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The Global Chief Sustainability Officer reports directly to the management board, meeting with members of the board regularly and frequently.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- ☒ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- ☒ Monitoring compliance with corporate environmental policies and/or commitments
- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental policies and/or commitments
- ☒ Setting corporate environmental targets

(4.3.1.4) Reporting line

Select from:

- ☒ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

(4.3.1.6) Please explain

The Global Chief Sustainability Officer reports directly to the Management Board, meeting with members of the board regularly and frequently.
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

- ☒ No, but we plan to introduce them in the next two years

(4.5.3) Please explain

Domtar's Annual Bonus Plan recognizes the company's performance which is measured using key performance indicators that are set every year based on strategic business goals, including EBITDA, safety performance and productivity.

Forests

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, but we plan to introduce them in the next two years

(4.5.3) Please explain

Domtar's Annual Bonus Plan recognizes the company's performance which is measured using key performance indicators that are set every year based on strategic business goals, including EBITDA, safety performance and productivity.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ No, but we plan to introduce them in the next two years

(4.5.3) Please explain

Domtar's Annual Bonus Plan recognizes the company's performance which is measured using key performance indicators that are set every year based on strategic business goals, including EBITDA, safety performance and productivity.

[Fixed row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.6.1.2) Level of coverage

Select from:

- ☒ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations

(4.6.1.4) Explain the coverage

Domtar's Environmental Policy applies to its own operations and features the management of our operations in compliance with all applicable environmental laws, regulations and other commitments to sustainable development. It states Domtar's approach to protect the environment and climate and articulates our collaborations to improve by engaging with policy makers, technical experts and industry associations. Responsible environmental stewardship is both an ethical obligation and a business imperative, integral to our overall commitment to sustainable development. We recognize that the long-term future of our company and the communities where we operate depends on the sustainability of the natural resources in our care and the performance of our operations.

(4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to take environmental action beyond regulatory compliance
- ☒ Commitment to stakeholder engagement and capacity building on environmental issues
- ☒ Other environmental commitment, please specify :Environmental Management Systems

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- ☒ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

- ☒ Publicly available

(4.6.1.8) Attach the policy

Microsoft Word - Domtar Environmental Policy_FINAL (EN).pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

	Are you a signatory or member of any environmental collaborative frameworks or initiatives?
	Select from: <input checked="" type="checkbox"/> No, but we plan to within the next two years

[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

- ☒ Yes, we engaged directly with policy makers
- ☒ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

- ☒ No, but we plan to have one in the next two years

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

- ☒ Yes

(4.11.6) Types of transparency register your organization is registered on

Select all that apply

☒ Mandatory government register

(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization

Canada, Quebec, Ontario.

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Engaging and building productive working relationships with stakeholders is at the core of Domtar's commitment to sustainability. We view a stakeholder as any individual or group that has an interest in or may be affected by or have an effect on our operations, initiatives or products. Domtar engages with stakeholders in a variety of ways in order to better understand their interests, concerns and goals, including townhall meetings, public consultations and surveys. These efforts help us identify high-impact, high-interest issues – what we call shared priorities – to drive everything from the development of our sustainability strategy to decisions about what we report and how we set public commitments.

[Fixed row]

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Row 1

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

The European Union Deforestation Regulation (EUDR)

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☒ Climate change

☒ Forests

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Transparency and due diligence

- ☒ Traceability requirements
- ☒ Collection, availability, and accessibility of forest-related information

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

- ☒ Global

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

- ☒ Support with major exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

As we work towards complying with the European Union Deforestation Regulation (EUDR), we continue to advocate for clarity on industry-wide obstacles for compliance, including strict geolocation and traceability requirements for forest residuals sourced from private land and compliance with laws in the country of origin.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

- ☒ Other, please specify :Engagement through industry trade associations (AF&PA, FPAC, and CEPI)

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Our business is founded upon the principles of sustainable growth, and we are committed to providing assurance that our wood products come from legal, sustainable sources and reflect social and environmental values. The European Union Deforestation Regulation (EUDR) is a regulation to ensure products produced

or marketed in the European Union do not contribute to deforestation or forest degradation. Domtar is committed to responsible sourcing and working towards compliance with EUDR. We are working closely with suppliers to collect the required geolocation data and validate compliance of raw materials with EUDR requirements. We are documenting due diligence procedures including the required elements of Articles 9, 10 and 11 of the EUDR Regulation. We are using a geospatial solution to manage supply chain traceability, EUDR risk assessments, and DDS submissions and we are working closely with customers to provide required geolocation data needed for compliance. In addition, our facilities are certified to rigorous, voluntary forestry standards of the Forest Stewardship Council® (FSC), the Sustainable Forestry Initiative® (SFI), and the Programme for the Endorsement of Forest Certification (PEFC). Forest certification, and the associated third-party audits, are important components of our responsible sourcing and due diligence programs.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☒ Another global environmental treaty or policy goal, please specify :The EU Green Deal

Row 2

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

The New York Tropical Deforestation-Free Procurement Act

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☒ Climate change

☒ Forests

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Low-impact production and innovation

☒ Deforestation-free products

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☒ Global

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☒ Oppose

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

While focused on tropical forests, the legislation's broad declaratory statements would have significant impacts on forestry taking place in Canadian Boreal forests, which are already subject to stringent laws and regulations.

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☒ Ad-hoc meetings

☒ Participation in working groups organized by policy makers

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Most of the virgin fiber consumed by Domtar's operations in Canada is sourced from the company's managed forests, which grow primarily on publicly owned land under provincial licenses in Canada's boreal forest. The boreal forest is a diverse ecological system that includes forests, wetlands, grasslands, tundra and rivers. Our

forest management practices in the boreal forest are governed by stringent government environmental standards and regulations designed to promote healthy, sustainable forests – balancing environmental, social and economic values. For decades, Domtar has worked with governments, communities, Indigenous Peoples and other stakeholders to protect wildlife habitats, breeding grounds and unique or culturally important ecosystems in the boreal forest

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

☒ Kunming-Montreal Global Biodiversity Framework

Row 4

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Carbon pricing programs, taxes and subsidies

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☒ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Financial mechanisms (e.g., taxes, subsidies, etc.)

☒ Carbon offsets

☒ Carbon taxes

☒ Emissions trading schemes

☒ Subsidies for low-carbon, non-renewable energy projects

- ☒ Taxes on products or services

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

- ☒ Regional

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

- ☒ Canada
- ☒ United States of America

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

- ☒ Support with minor exceptions

(4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

Our key criteria for effective and competitive climate pricing programs include: - Recognition of our early actions to reduce greenhouse gas emissions - Heavy reliance on carbon-neutral biomass fuels - Use of co-generation systems using mainly biomass fuels - Remaining competitive in global markets - Provisions to prevent leakage of emissions, jobs and investments to other jurisdictions with no or less restrictive carbon pricing programs - Avoiding double regulation with provincial and federal government initiatives - Limited opportunities for additional, significant emission reductions without the development and deployment of commercially available technology solutions that are compatible with our processes and product quality and performance requirements, and - Reinvesting proceeds collected from carbon pricing programs proportionally back into the industry sectors

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

- ☒ Ad-hoc meetings
- ☒ Participation in working groups organized by policy makers

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Our operations in Canada currently pay fees into regulatory mandated carbon pricing programs. Domtar works to ensure our operations in Canada remain competitive in global markets and there are provisions to prevent leakage of emissions, jobs and investments to other jurisdictions with no or less restrictive carbon pricing programs. We also work to ensure proceeds collected from carbon pricing programs are reinvested proportionally back into our industry sector.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 5

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Low carbon products and services

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

☒ Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Energy and renewables

☒ Energy attribute certificate systems

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☒ Sub-national

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☒ United States of America

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☒ Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☒ Ad-hoc meetings

☒ Discussion in public forums

☒ Participation in working groups organized by policy makers

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

Some of Domtar's mills generate electricity and energy attributes from renewable biomass (solid and liquid) that is sold into various markets. We work to ensure these low carbon products are recognized or continue to be recognized as qualifying energy sources for meeting renewable energy goals in some jurisdictions.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

[Add row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

☒ Other trade association in North America, please specify :Forest Products Association of Canada (FPAC) and American Forests & Paper Association (AF&PA)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

☒ Forests

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Our business is founded upon the principles of sustainable growth and are committed to providing assurance that our wood products come from legal, sustainable sources and reflects social and environmental values. The European Union Deforestation Regulation (EUDR) is a new regulation to ensure products produced or marketed in the European Union do not contribute to deforestation or forest degradation. As we work towards complying with the European Union Deforestation Regulation (EUDR), we continue to advocate for clarity on industry-wide obstacles for compliance, including strict geolocation and traceability requirements for forest residuals sourced from private land and compliance with laws in the country of origin.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

800000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

Domtar is a member of a number of industry associations and scientific institutions, including FPInnovations, American Forest & Paper Association (AF&PA), Forest Products Association of Canada (FPAC), Ontario Forest Industries Association (OFIA), National Council for Air and Stream Improvement (NCASI), the Paper & Packaging Board, Québec Forest Industry Council (QFIC) and Two Sides. In addition to providing funding to these organizations, members of Domtar's management and internal issue experts participate in board meetings, chair committees and play various supportive roles. We partner with industry and business organizations to share perspectives on policies and issues that affect our industry, our business and the communities where we operate. These partnerships address a number of areas of mutual interest, including wood fiber supply, environmental regulations and carbon emissions management, transportation standards, third-party certification of our products, and the economic impact of our operations on local and national scales.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☒ Another global environmental treaty or policy goal, please specify :The EU Green Deal

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

☒ National Association of Manufacturers

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

☒ Forests

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Mixed

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

We did not attempt to influence this organization's position in 2024.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☒ Kunming-Montreal Global Biodiversity Framework

Row 4

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

☒ Other trade association in North America, please specify :Forest Products Association of Canada (FPAC)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

Keeping the Canadian forest products industry globally competitive is the primary focus of FPAC's advocacy for climate-related activities. This includes maintaining our industry recognition as EITE (Energy Intense and Trade Exposed) and obtaining relief from carbon pricing programs to remain competitive in the global marketplace as much of Canadian forest products are commodity products which are exported globally. FPAC's policies are also focused on ensuring carbon leakage to jurisdictions with higher carbon emissions does not occur.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 5

(4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

(4.11.2.4) Trade association

North America

☒ Other trade association in North America, please specify :Industrial Energy Consumers of America (IECA)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ Yes, we publicly promoted their current position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

All IECA members that are major energy users have a seat on the Board of Directors, so Domtar is a member of the IECA Board. IECA's primary focuses regarding climate change include: protecting the competitiveness of member companies and ensuring proper treatment to protect against industrial greenhouse gas emission leakage to regions of the world with higher greenhouse gas emission profiles. In addition, IECA is focused on securing government funding and R&D for technology advancements to decarbonize. The heavy industrial sector (e.g., cement, steel, pulp and paper) will be the most challenging to decarbonize due to its high energy and temperature demands for their manufacturing processes. IECA is also focusing on domestic and global carbon border adjustment mechanisms (CBAM) to ensure US industrial competitiveness is not disadvantaged. In particular, IECA is focusing on a consistent approach to determining and reporting carbon intensity used for implementing CBAM.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☒ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

- ☒ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

- ☒ GRI
- ☒ Other, please specify :SASB

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water
- ☒ Biodiversity

(4.12.1.4) Status of the publication

Select from:

- ☒ Complete

(4.12.1.5) Content elements

Select all that apply

- | | |
|----------------------------------------------------------------|--------------------------------------------------------------|
| <input checked="" type="checkbox"/> Strategy | <input checked="" type="checkbox"/> Risks & Opportunities |
| <input checked="" type="checkbox"/> Governance | <input checked="" type="checkbox"/> Value chain engagement |
| <input checked="" type="checkbox"/> Emission targets | <input checked="" type="checkbox"/> Dependencies & Impacts |
| <input checked="" type="checkbox"/> Emissions figures | <input checked="" type="checkbox"/> Biodiversity indicators |
| <input checked="" type="checkbox"/> Commodity volumes | <input checked="" type="checkbox"/> Water accounting figures |
| <input checked="" type="checkbox"/> Water pollution indicators | |

- ☑ Content of environmental policies
- ☑ Deforestation and conversion footprint
- ☑ Deforestation- and conversion-free (DCF) status metrics

(4.12.1.6) Page/section reference

pp. 11-12, 58-61

(4.12.1.7) Attach the relevant publication

Domtar_SGR2025_ENG_V10.pdf

(4.12.1.8) Comment

Domtar's inaugural sustainability report as a company integrating its three legacy companies and highlighting its 2024 performance.
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ First time carrying out analysis

Forests

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ Annually

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ SSP1

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Business division

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Acute physical
- ☒ Chronic physical
- ☒ Policy
- ☒ Technology

(5.1.1.6) Temperature alignment of scenario

Select from:

- ☒ 2.0°C - 2.4°C

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Changes to the state of nature
- ☒ Climate change (one of five drivers of nature change)

Finance and insurance

- ☒ Cost of capital
- ☒ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- ☒ Consumer sentiment
- ☒ Consumer attention to impact

Regulators, legal and policy regimes

☑ Global regulation

☑ Methodologies and expectations for science-based targets

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Technology: Technology developments and advancements to decarbonize our manufacturing processes are routinely monitored and assessed to ensure they meet business needs, product specifications and other customer requirements. Domtar is actively involved with third-party groups to identify low-carbon technologies for our manufacturing processes, and we advocate for public-private sector funding to incentivize innovation. We have identified the carbon "hotspots" within our manufacturing processes and are seeking low carbon solutions. Legal: Legal oversees climate-related legal matters and is actively involved with creating agreements and contracts with technology and other business partners. Market: Potential market risks from supply disruptions and impacts to customers are continually reviewed, assessed and mitigation plans implemented. We follow development of decarbonization plans of our key customers to ensure our products remain relevant and help our customers meet their business objectives in a low-carbon economy. We consider the renewability of our products and support recycling infrastructure and certain policies needed for a low-carbon, circular economy. Reputation: We routinely engage with customers and other stakeholders on our sustainable business practices and efforts to mitigate risk. We work with our value chain to support shared decarbonization objectives. These conversations provide us with valuable insights to inform our scenario planning.

(5.1.1.11) Rationale for choice of scenario

RCP 2.6 represents a peak and decline scenario with an estimated global warming likely below 2 degrees C by 2100. Exposure to key hazards in this climate scenario was considered to assess whether assets in various geographical locations would be impacted by chronic or acute risks and help with our strategy for future climate related decision.

Forests

(5.1.1.1) Scenario used

Forests scenarios

☑ Customized publicly available forests scenario, please specify :We perform scenario analysis through highly-regulated forest management planning in Canada and the United States.

(5.1.1.3) Approach to scenario

Select from:

- ☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- ☒ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Acute physical
- ☒ Chronic physical
- ☒ Policy

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2080

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Changes to the state of nature
- ☒ Climate change (one of five drivers of nature change)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Natural Resources Canada—Canadian Forest Service's Forest Change program provides information about the impacts of climate change on Canada's forests and on how to adapt to changing climate conditions. The initiative reports on indicators that reflect past trends in, and future projections of, changes across Canada. It also provides adaptation tools and resources for forest managers. For instance, the Forest Vulnerability Assessment Tool is an interactive map that shows Canadian forest vulnerability to drought and migration failure by combining spatially explicit exposure to climate change, stand composition data and species sensitivity. Not all species will react equally in the face of rapid environmental change. Vulnerability depends on its degree of exposure (i.e., the environmental change an individual will experience), its sensitivity to altered growing conditions, and its adaptive capacity (i.e., its ability to accommodate or cope with those environmental changes). For more info:

https://glfc.cfsnet.nfis.org/fcvul/index.php?lang&_gl1*7bp8xz*_ga*NjgyOTg5OTg0LjE3Mjc2NjIzMzY.*_ga_C2N57Y7DX5*MTcyODMyODM3Ni4zLjEuMTcyODMyODU3Ny4wLjAuMA

(5.1.1.11) Rationale for choice of scenario

The Canadian Forest Service (CFS) collaborates closely with academia, industry as well as Canada's provinces and territories to ensure our forests are sustainable and healthy.

Water

(5.1.1.1) Scenario used

Water scenarios

☒ WRI Aqueduct

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

- ☒ Acute physical
- ☒ Chronic physical

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Climate change (one of five drivers of nature change)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Aqueduct's tools use open-source, peer-reviewed data to map water risks such as floods, droughts, and stress. Beyond the tools, the Aqueduct team works one-on-one with companies, governments and research partners through the Aqueduct Alliance to help advance best practices in water resource management and enable sustainable growth in a water-constrained world. For more info: <https://www.wri.org/applications/aqueduct/water-risk-atlas>

(5.1.1.11) Rationale for choice of scenario

Aqueduct's tools use open-source, peer-reviewed data to map water risks such as floods, droughts, and stress. 2050 is consistent with our long-term planning horizon of 15 to 25 years.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

- ☒ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ SSP5

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 4.0°C and above

(5.1.1.7) Reference year

2020

(5.1.1.8) Timeframes covered

Select all that apply

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☑ Changes to the state of nature
- ☑ Changes in ecosystem services provision
- ☑ Climate change (one of five drivers of nature change)

Finance and insurance

- ☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- ☑ Consumer attention to impact

Direct interaction with climate

- ☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Several of our assets, including pulp, tissue and sawmills located in the US and Canada were considered for the scenario analyses. To better understand the organizational resilience to future climate risk, scenario analyses were performed using Willis Towers Watson's analytical model Climate Diagnostic to understand potential future climate related risks. Representative Concentration Pathways (RCPs) are climate scenarios developed for the climate modeling community to provide a consistent set of projections of future greenhouse gas (GHG) concentrations and other forcings. They are used to assess potential future climate changes by integrating socio-economic trends, technological developments, and policy choices with their impacts on GHG emissions and concentrations.

(5.1.1.11) Rationale for choice of scenario

RCP 8.5 represents the extreme end of climate change, with an estimated global average temperature increase of approximately 5-6°C by 2100. Exposure to key hazards in this climate scenario was considered to assess whether assets in various geographical locations would be impacted by chronic or acute risks and help with our strategy for future climate-related decisions.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☒ SSP3

(5.1.1.3) Approach to scenario

Select from:

☒ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☒ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 2.5°C - 2.9°C

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

☒ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Changes to the state of nature

☒ Changes in ecosystem services provision

☒ Climate change (one of five drivers of nature change)

Finance and insurance

☒ Cost of capital

☒ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☒ Consumer sentiment

☒ Consumer attention to impact

Regulators, legal and policy regimes

☒ Global regulation

☒ Methodologies and expectations for science-based targets

Direct interaction with climate

☒ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Technology: Technology developments and advancements to decarbonize our manufacturing processes are routinely monitored and assessed to ensure they meet business needs, product specifications and other customer requirements. Domtar is actively involved with third-party groups to identify low-carbon technologies for our manufacturing processes, and we advocate for public-private sector funding to incentivize innovation. We have identified the carbon "hotspots" within our manufacturing processes and are seeking low carbon solutions. Legal: Legal oversees climate-related legal matters and is actively involved with creating agreements and contracts with technology and other business partners. Market: Potential market risks from supply disruptions and impacts to customers are continually reviewed,

assessed and mitigation plans implemented. We follow development of decarbonization plans of our key customers to ensure our products remain relevant and help our customers meet their business objectives in a low-carbon economy. We consider the renewability of our products and support recycling infrastructure and certain policies needed for a low-carbon, circular economy. Reputation: We routinely engage with customers and other stakeholders on our sustainable business practices and efforts to mitigate risk. We work with our value chain to support shared decarbonization objectives. These conversations provide us with valuable insights to inform our scenario planning.

(5.1.1.11) Rationale for choice of scenario

RCP 4.5 represents a stabilization scenario which assumes action is taken to curb climate change by all countries resulting in a global average temperature rise of no more than 2 degrees C and 3 degrees C by 2100. Exposure to key hazards in this climate scenario was considered to assess whether assets in various geographical locations would be impacted by chronic or acute risks and help with our strategy for future climate related decision.

[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management
- ☒ Strategy and financial planning
- ☒ Resilience of business model and strategy
- ☒ Capacity building
- ☒ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- ☒ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Key issues reviewed include: Physical Impacts of weather-related events to our manufacturing operations, impacts of changing climate on raw material availability, and shifting market demand and customer requirements for pulp and paper products. Actions Domtar has taken to address focal questions related to climate-related scenario analysis include: Improved inventory management, redundancy in ability to produce products in our manufacturing network, maintaining diversified suppliers, and engagement with customers to understand and meet shifting product and business requirements.

Forests

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management
- ☒ Strategy and financial planning
- ☒ Resilience of business model and strategy
- ☒ Capacity building
- ☒ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- ☒ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Key issues reviewed include: Forest Management Planning - species, size class, soil conditions, high conservation values, stakeholder engagement & consultation, management objectives, natural and cultural features, risks (wildfire, pests/disease), wildlife and species habitats. Fiber Procurement - shifts in land use (carbon project development, risks of conversion/deforestation), regulatory changes, shifting market dynamics, certified fiber availability.

Water

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management
- ☒ Strategy and financial planning

- ☒ Resilience of business model and strategy
- ☒ Capacity building
- ☒ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- ☒ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Domtar has established two 2030 targets: (1) reduce water use intensity by 20% from the 2020 baseline within the Paper and Packaging business unit, and (2) ensure that 100% of facilities implement risk mitigation plans within one year of completing risk assessments. Outputs from the WRI analysis are used to identify facilities in water-stressed areas, allowing Domtar to prioritize these locations for water-reduction initiatives and to incorporate water-related risks into financial planning.

[Fixed row]

(5.2) Does your organization's strategy include a climate transition plan?

	Transition plan	Primary reason for not having a climate transition plan that aligns with a 1.5°C world	Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world
	Select from: <input checked="" type="checkbox"/> No, but we are developing a climate transition plan within the next two years	Select from: <input checked="" type="checkbox"/> Other, please specify :Domtar has committed to establish a science-based reduction target for our Scope1, 2 and 3 greenhouse gas emissions in 2026.	<i>Domtar has committed to establish a science-based reduction target for our Scope1, 2 and 3 greenhouse gas emissions in 2026.</i>

[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☒ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☒ Products and services

☒ Upstream/downstream value chain

☒ Investment in R&D

☒ Operations

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

☒ Risks

☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

☒ Forests

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our 2030 Sustainability Strategy includes the following objectives, with related targets: -Advance our commitment to sustainable forest management across Domtar's value chain for all wood and fiber -Positively impact biodiversity through our forest, fiber supply chain and operational footprint -Decarbonize our operations, products and value chain by leveraging renewable, sustainable, fossil-free resources and efficient manufacturing processes Domtar is utilizing our expertise as

renewable, fiber innovators to expand into growth businesses. We are transforming to produce higher-value, products for society by leveraging our extensive knowledge of wood fiber and the ability to extract the natural chemical building blocks of trees for use in new products. Domtar's specialty and packaging papers teams are working with current and potential new customers to help them replace single-use plastic products with lower-carbon, renewable, recyclable and/or biodegradable fiber-based products. Domtar is working on innovations to replace plastic bags with ones made from 100 percent paper-based material that is sourced from a sustainably managed, renewable natural resource, and is robust enough for limited reuse in a bag application and curbside recyclable. We currently repurposing a paper machine at our Hawesville, KY, mill to support commercialization of these products. Domtar's heavy reliance on biomass fuels and extensive co-generation systems allows us to generate renewable energy certificates (RECs) that can be purchased by others to meet their business requirements.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change
- ☒ Forests

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our 2030 Sustainability Strategy includes the following objectives, with related targets: -Advance our commitment to sustainable forest management across Domtar's value chain for all wood and fiber -Positively impact biodiversity through our forest, fiber supply chain and operational footprint -Decarbonize our operations, products and value chain by leveraging renewable, sustainable, fossil-free resources and efficient manufacturing processes -Drive sustainability through product, process and value chain innovation, focusing on delivering measurable environmental and business value while advancing circular solutions We continue to assess and evaluate decarbonization opportunities through partnerships with suppliers, customers and other business ventures. Domtar actively participates in sustainable forest management and harvesting practices. Our demand for locally sourced wood resources creates economic incentives for landowners to continue to maintain sustainably managed forests which provide society with recreational benefits, enhanced biodiversity and other ecological benefits such as carbon sequestration. Domtar, the American Forest Foundation and its partner, The Nature Conservancy, are supporting the Family Forest Carbon Program (FFCP) to enhance carbon sequestration in family-owned forest land across the United States. The FFCP represents a newer approach to climate change mitigation that taps into the carbon storage potential of family-owned forestland while creating a new market and source of income for the families that dedicate time and effort to their forest management. Families own 290 million acres of America's forests, more than state or federal governments and the forest industry, and many face costs as a barrier in managing their forestland. Domtar's support of the FFCP will expedite family forest owner outreach and will initially enable family forest owners to take action on their land in Pennsylvania where the program is being pilot tested. For more information about the program, please go to: <https://www.forestfoundation.org/carbon>.

We are also engaging our suppliers and potential suppliers of raw materials and equipment to improve the cost and efficiency of our manufacturing processes and beginning to work with the value chain on decarbonization.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

☒ Forests

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our 2030 Sustainability Strategy includes the following objective, with related targets: -Drive sustainability through product, process and value chain innovation, focusing on delivering measurable environmental and business value while advancing circular solutions Domtar is utilizing our expertise as renewable, fiber innovators to expand into growth businesses. We are transforming to produce higher-value, products for society by leveraging our extensive knowledge of wood fiber and the ability to extract the natural chemical building blocks of trees for use in new products. Domtar is actively involved with third-party groups to help identify low-carbon technologies for our manufacturing processes, and we advocate for public-private sector funding to incentivize innovation. The company is also working with third parties to advance our understanding of sustainable forest management and harvest practices and their link to a forests' ability to sequester carbon. Additionally, the company is involved with a third-party evaluating carbon capture and storage of both biogenic and fossil carbon dioxide from a chemical (Kraft) pulp mill.

Operations

(5.3.1.1) Effect type

Select all that apply

☒ Risks

☒ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Our 2030 Sustainability Strategy includes the following objectives, with related targets: -Advance our commitment to sustainable forest management across Domtar's value chain for all wood and fiber -Positively impact biodiversity through our forest, fiber supply chain and operational footprint -Decarbonize our operations, products and value chain by leveraging renewable, sustainable, fossil-free resources and efficient manufacturing processes -Improve the water resiliency of our manufacturing operations by reducing water-related risks and impacts Domtar can produce similar products at multiple locations, which minimizes business disruption to our customers. Domtar contracts with multiple suppliers of raw materials and transport to minimize inbound and outbound supply risks to our operations.
[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

- | | |
|-------------------------------------------------------|------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Assets | <input checked="" type="checkbox"/> Capital allocation |
| <input checked="" type="checkbox"/> Revenues | <input checked="" type="checkbox"/> Capital expenditures |
| <input checked="" type="checkbox"/> Direct costs | <input checked="" type="checkbox"/> Acquisitions and divestments |
| <input checked="" type="checkbox"/> Indirect costs | |
| <input checked="" type="checkbox"/> Access to capital | |

(5.3.2.2) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☒ Climate change
- ☒ Forests
- ☒ Water

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Our 2030 Sustainability Strategy, based on an extensive impacts, risks and opportunities (IRO) assessment undertaken in 2024, includes the following objectives, with related targets: -Advance our commitment to sustainable forest management across Domtar's value chain for all wood and fiber -Positively impact biodiversity through our forest, fiber supply chain and operational footprint -Decarbonize our operations, products and value chain by leveraging renewable, sustainable, fossil-free resources and efficient manufacturing processes -Improve the water resiliency of our manufacturing operations by reducing water-related risks and impacts Domtar actively forecasts, budgets and manages carbon-related costs and emissions in the jurisdictions with carbon-pricing programs (i.e., Canada). We have developed an internal price on carbon and are working on an implementation approach for projects in jurisdictions that currently do not have regulatory carbon-pricing programs (i.e., United States). Domtar plans to utilize an internal price on carbon to inform project planning and capital allocation for future operating scenarios. Domtar is developing carbon reduction roadmaps for Scope 1 and 2 GHG emissions for its manufacturing facilities, and we plan to establish a science-based emissions target for Scopes 1, 2 and 3 by 2026. Domtar sells renewable energy and renewable energy certificates from cogeneration assets largely fueled by renewable, biomass fuels. Domtar is regularly looking for opportunities to partner with other entities on research and product development for a low-carbon economy. In 2024, we joined forces with Boisaco and the Centre de recherche sur la boréale (CREB) of the Université du Québec à Chicoutimi (UQAC) to support leading edge research projects that will address the challenge of managing Quebec's forests sustainably by way of a CA\$2.15 million over five years, with Domtar providing CA\$350,000 annually. In 2023, we launched an award-winning program that dedicates a portion of capital spending solely for water-reduction projects. The million-dollar fund was designed to attract projects and ideas from across our network and was active in 2024. Mills submit proposals for a chance to earn a portion of the available funds. Importantly, no financial return was required for the projects. The sole goal was water reduction.

[Add row]

(5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: <input checked="" type="checkbox"/> No, but we plan to in the next two years

[Fixed row]

(5.9) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

(5.9.1) Water-related CAPEX (+/- % change)

0

(5.9.2) Anticipated forward trend for CAPEX (+/- % change)

0

(5.9.3) Water-related OPEX (+/- % change)

0

(5.9.4) Anticipated forward trend for OPEX (+/- % change)

0

(5.9.5) Please explain

We launched an award-winning program in 2023, dedicating a portion of capital spending solely for water-reduction projects. This fund was designed to attract projects and ideas from across our network. Mills submit proposals for a chance to earn a portion of the available funds. Importantly, no financial return was required

for the projects. The sole goal was water reduction to help position us to achieve our water intensity target: a 20% reduction in water use per unit of product by 2030, compared to 2020 levels. We are proud of our team's ability to turn ideas into reality and are committed to enhancing the water resiliency of our operations through our 2030 Sustainability Strategy. As part of that initiative, we have committed to ensuring 100% of our facilities have water-related risk mitigation plans in place by 2030 - a commitment that means water-focused capital investments will continue.

[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Carbon

[Fixed row]

(5.10.1) Provide details of your organization's internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:

☒ Shadow price

(5.10.1.2) Objectives for implementing internal price

Select all that apply

☒ Drive energy efficiency

☒ Drive low-carbon investment

☒ Identify and seize low-carbon opportunities

- ☒ Navigate regulations

(5.10.1.3) Factors considered when determining the price

Select all that apply

- ☒ Alignment with the price of a carbon tax
- ☒ Alignment with the price of allowances under an Emissions Trading Scheme

(5.10.1.4) Calculation methodology and assumptions made in determining the price

Our internal price for Ontario operations is updated based on the current and future projected rates of the government's carbon tax. The prices are disclosed and increase on April 1st of each year from C\$65 per metric ton of CO₂e in 2023 to C\$170 per metric ton by 2030. In April 2024, prices were increased from C\$65 to C\$80 (USD58.10). For our Quebec operations, we use the most up-to-date price following each cap-and-trade auction. Prices per metric ton of CO₂e varied in 2024, with an average auction price of C\$48.22 (USD 35.21). The annual projected prices up to 2030 are based on recognized third-party forecasts and are updated as required.

(5.10.1.5) Scopes covered

Select all that apply

- ☒ Scope 1
- ☒ Scope 3, Category 1 - Purchased goods and services
- ☒ Scope 3, Category 4 - Upstream transportation and distribution
- ☒ Scope 3, Category 9 - Downstream transportation and distribution

(5.10.1.6) Pricing approach used – spatial variance

Select from:

- ☒ Differentiated

(5.10.1.7) Indicate how and why the price is differentiated

Our internal price for Ontario operations is based on the Ontario government's rates of carbon tax. For our Quebec operations, we use carbon prices following each cap-and-trade auction.

(5.10.1.8) Pricing approach used – temporal variance

Select from:

☒ Evolutionary

(5.10.1.9) Indicate how you expect the price to change over time

For our Ontario operations, prices are disclosed and increase on April 1st of each year by 15 per ton of CO2e emissions. For our Quebec operations, carbon prices vary every cap-and-trade auction, which is held four times every year.

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

26.2

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

47.81

(5.10.1.12) Business decision-making processes the internal price is applied to

Select all that apply

☒ Capital expenditure

☒ Operations

☒ Opportunity management

(5.10.1.13) Internal price is mandatory within business decision-making processes

Select from:

☒ Yes, for some decision-making processes, please specify :A carbon price is included in decision-making of our Canadian operations, as they are impacted by carbon costs. For the US facilities, the impact of a project on GHG emissions is evaluated and taken into consideration in the decision-making process.

(5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

18

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☒ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

On a monthly basis, costs associated with carbon pricing (not including the free allowances we receive from the government) are updated and shared with the president & CEO and executive team, senior management, controllers, and mill managers to create awareness and facilitate an internal change in behavior. In doing so, the goal is also to promote projects with low carbon opportunities to reduce costs over the longer term. Capital expenditure projects for every Canadian mill include a process for assessing the impact on greenhouse gas emissions and associated carbon costs over time (the evaluation can be completed up to 2030). This can contribute to a project's return on investment. For example, the first evaluation of the use of electric boilers at our Alma and Kénogami (Quebec) paper mills in 2018, which was designed to optimize the use of hydroelectricity over natural gas, included a carbon cost calculation, in addition to assessing the price of the two energies. This provided the business case for this optimization practice, and the approach has been repeated each year before winter to ensure viability.

[Add row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Forests
Smallholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply
Customers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Forests <input checked="" type="checkbox"/> Water
Investors and shareholders	Select from:	Select all that apply

	Engaging with this stakeholder on environmental issues	Environmental issues covered
	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Forests
Other value chain stakeholders	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Forests <input checked="" type="checkbox"/> Water

[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☒ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☒ Contribution to supplier-related Scope 3 emissions

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☒ 1-25%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Domtar's strategic approach focuses on engaging its largest suppliers—particularly those with significant environmental footprints or established climate commitments.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

☒ 1-25%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

15

Forests

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☒ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☒ Dependence on ecosystem services/environmental assets

☒ Impact on deforestation or conversion of other natural ecosystems

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☒ 100%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

100% of fiber suppliers meet third-party fiber sourcing standards.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

☒ 100%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

500

[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☒ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

- ☒ Business risk mitigation
- ☒ Product safety and compliance
- ☒ Regulatory compliance

(5.11.2.4) Please explain

Domtar works with suppliers to ensure the raw materials we source comply with product regulatory and safety requirements and to improve the environmental profile of the raw materials we purchase, our manufacturing processes, our products and transport of these products to our customers. Some of these initiatives include: - Providing financial and technical support to help small, private landowners certify their forests to recognized sustainable forest management standards. - Collecting data and information on chemicals and raw materials to ensure they meet our regulatory and product safety requirements. - Engaging in conversations and meetings with our suppliers to identify ways our manufacturing facilities can use raw materials more efficiently, minimize their use and substitute raw materials for alternatives with improved environmental profiles. Our suppliers also support engineering evaluations for new projects, products and services. - Engaging with energy providers to assess both renewable energy purchases and opportunities for them to utilize our energy resources. - Collaborating with suppliers where we have shared interests in meeting both our business and sustainability objectives (e.g., decarbonization and reduced water use).

Forests

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☒ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☒ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to forests

☒ Business risk mitigation

☒ Product safety and compliance

☒ Regulatory compliance

(5.11.2.4) Please explain

Domtar prioritizes landowner engagement and outreach to small and family landowners. Small landowners are a vital part of our value chain. The majority of our sourcing in the Southeastern US comes from small, often family-owned woodlots. These landowners typically have less access to resources and capacity to support management planning. These lands are also often at high risk of conversion after they are harvested because they are in or near areas of substantial urban development, are in ownership transition, and/or have met the needs of the current landowner in terms of value.

[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☒ No, but we plan to introduce environmental requirements related to this environmental issue within the next two years

(5.11.5.3) Comment

Domtar does not currently have a formal policy requiring all suppliers to meet specific environmental criteria as part of our purchasing process, as we have not yet established defined targets for supplier environmental performance across our full supply chain. However, we actively engage with suppliers on key environmental topics, including responsible fiber sourcing, energy efficiency, and certification standards such as FSC. These engagements help us understand current practices, identify opportunities for improvement, and provide guidance to support enhanced environmental performance. Looking forward, Domtar intends to establish clear environmental expectations and measurable targets for suppliers on emissions reductions along with monitoring and reporting mechanisms to track supplier performance. Looking forward, Domtar intends to establish clear environmental expectations and measurable targets for suppliers within a broader sustainability program. This program will include requirements on emissions reductions, responsible sourcing, and deforestation-free practices, along with monitoring and reporting mechanisms to track supplier performance. We will prioritize engagement with high-impact suppliers and provide training and tools to facilitate continuous improvement, laying the groundwork for a formal policy.

Forests

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☒ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☒ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

Fiber suppliers are subject to third-party certification schemes, such as FSC Controlled Wood and/or SFI Fiber Sourcing Standards.
[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Forests

(5.11.6.1) Environmental requirement

Select from:

☒ Compliance with an environmental certification, please specify :FSC Controlled Wood and SFI Fiber Sourcing Standard

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☒ First-party verification

☒ Grievance mechanism/ Whistleblowing hotline

☒ On-site third-party audit

☒ Second-party verification

☒ Geospatial monitoring tool

☒ Ground-based monitoring system

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☒ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☒ 76-99%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

☒ 100%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are in compliance with this environmental requirement

Select from:

☒ 76-99%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☒ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ 100%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

- ☒ Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics
- ☒ Providing information on appropriate actions that can be taken to address non-compliance
- ☒ Re-integrating suppliers back into upstream value chain based on the successful and verifiable completion of activities

(5.11.6.12) Comment

Our response on this line applies only to our fiber suppliers, of which there are approximately 700, and not all vendors contracted by the company.
[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

- ☒ Emissions reduction

(5.11.7.3) Type and details of engagement

Information collection

- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect GHG emissions data at least annually from suppliers
- ☒ Other information collection activity, please specify :Conducted a supply chain survey with our largest suppliers to enhance our scope 3 reporting

(5.11.7.4) Upstream value chain coverage

Select all that apply

- ☒ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

- ☒ 1-25%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

- ☒ 76-99%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Domtar reports its sustainability performance based on shared priority issues, which are topics that reflect the company's significant environmental, social and economic impacts, and that substantively influence the assessments and decisions of our stakeholders. We monitor our shared priorities on a continuous basis through regular interaction with stakeholders, including suppliers. Our most recent comprehensive assessment was completed in 2023 and 2024 for the completion of

a Double Materiality Assessment (DMA) where carbon emissions and emission reduction was identified in our Impacts Risks and Opportunities (IRO) statements that informed our most material topics.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Yes

Forests

(5.11.7.1) Commodity

Select from:

☒ Timber products

(5.11.7.2) Action driven by supplier engagement

Select from:

☒ No deforestation and/or conversion of other natural ecosystems

(5.11.7.3) Type and details of engagement

Capacity building

☒ Provide training, support and best practices on how to mitigate environmental impact

Innovation and collaboration

☒ Collaborate with suppliers on innovations to reduce environmental impacts in products and services

☒ Encourage collaborative work in landscapes or jurisdictions

☒ Invest jointly with suppliers in R&D of relevant low-carbon technologies

(5.11.7.4) Upstream value chain coverage

Select all that apply

☒ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☒ 1-25%

(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue covered by engagement

Select from:

☒ 1-25%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Domtar reports its sustainability performance based on shared priority issues, which are topics that reflect the company's significant environmental, social and economic impacts, and that substantively influence the assessments and decisions of our stakeholders. We monitor our shared priorities on a continuous basis through regular interaction with stakeholders, including suppliers. Our most recent comprehensive assessment was completed in 2023 and 2024 for the completion of a Double Materiality Assessment (DMA) where deforestation was identified in our Impacts Risks and Opportunities (IRO) statements that informed our most material topics.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☒ Yes, please specify the environmental requirement :Chain of custody requirements, including forest risk assessments and monitoring

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Yes

Water

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☒ No, this engagement is unrelated to meeting an environmental requirement

[Add row]

(5.11.8) Provide details of any environmental smallholder engagement activity

Row 1

(5.11.8.1) Commodity

Select from:

☒ Timber products

(5.11.8.2) Type and details of smallholder engagement approach

Capacity building

- ☒ Offer on-site technical assistance and extension services
- ☒ Support smallholders to adhere to standards in upstream value chain
- ☒ Support smallholders to adopt best practices which protect biodiversity
- ☒ Support smallholders to clarify and secure land tenure rights
- ☒ Support smallholders to measure and address their exposure to environmental risk

Financial incentives

- ☒ Provide financial incentives for certified products

Innovation and collaboration

- ☒ Encourage smallholders to take part in landscape or jurisdictional initiatives

(5.11.8.3) Number of smallholders engaged

400

(5.11.8.4) Effect of engagement and measures of success

In Quebec, we purchase virgin fiber from private woodlot owners through brokers who maintain chain of custody tracking. In Ontario, virgin fiber purchases are made directly from private woodlot owners, while in the U.S., third-party suppliers work with private owners to harvest and deliver most of the fiber used at our operations. For both our internal and external wood and fiber, 100% is sourced in accordance with SFI Fiber Sourcing requirements, PEFC chain-of-custody due diligence requirements, or the FSC Controlled Wood Standard, and in some cases a combination of these standards. All of these require 100% of the fiber processed meet minimum due diligence requirements related to risks of illegal logging and other important sustainability issues. Our own certifications require us to work only with suppliers who are trained in the use of best management practices for timber harvesting and who commit to being accountable for implementing these practices. This helps ensure that environmental concerns, such as protection of water quality, soil and endangered species, are addressed within the areas from which we source our timber, even though the non-industrial private forest landowners may not themselves be certified. In addition, Domtar is actively engaged in SFI implementation committees in all regions where we operate mills. These SFI implementation committees promote the certification of the land base as well as the use of best management practices, among other things. In 2021, the Quebec SFI Implementation Committee developed a monitoring process based on the findings of a visit to smallholders in order to facilitate improving training procedures. This is an ongoing joint effort between 16 large companies in Quebec, covering most of the smallholders in the province, and we continued to work on the initiative in 2024.

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Align your organization's goals to support customers' targets and ambitions

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 1-25%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☒ 100%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Customers are a critical stakeholder group for Domtar in shaping and advancing our climate goals. Their expectations for transparency and low-carbon solutions directly influence our operational practices and long-term competitiveness. As climate-related performance increasingly drive their decisions, our engagement with customers ensures that Domtar remains aligned with their needs while contributing to broader decarbonization efforts. Customer engagement was a critical input to evaluate Domtar's Impact, Risk, and Opportunity (IRO) statements enabling us to complete our Double Materiality Assessment (DMA). By integrating customer perspectives, we were able to validate where our operations and products intersect most directly with climate risks and opportunities. This customer engagement is vital because it helps identify where Domtar's business has the greatest potential to contribute to or be affected by climate transition risks. Customers are often downstream leaders in disclosure and are subject to their own climate commitments. By working closely with them, Domtar not only responds to market requirements but also positions itself as a value-chain partner capable of supporting their climate goals.

(5.11.9.6) Effect of engagement and measures of success

Outcomes from this engagement included improved alignment of Domtar's climate commitments with customer targets, enhanced credibility through transparent reporting, and expanded opportunities for collaboration on low-carbon innovations. This dialogue also reinforced trust, as customers gained confidence that Domtar's sustainability strategy is robust, science-informed, and compliance-ready.

Forests

(5.11.9.1) Type of stakeholder

Select from:

☒ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Align your organization's goals to support customers' targets and ambitions

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 1-25%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Customers are a critical stakeholder group for Domtar in shaping and advancing our forest management and fiber sourcing goals. Their expectations for transparency and certified products directly influence our operational practices and long-term competitiveness. As forest management and certification increasingly drive their decisions, our engagement with customers ensures that Domtar remains aligned with their needs while contributing to broader sustainability efforts. Customer engagement was a critical input to evaluate Domtar's Impact, Risk, and Opportunity (IRO) statements enabling us to complete our Double Materiality Assessment (DMA). By integrating customer perspectives, we were able to validate where our operations and products intersect most directly with forest risks and opportunities. This customer engagement is vital because it helps identify where Domtar's forest operations have the greatest potential to contribute to or be affected by impacts and risks. Customers are often downstream leaders in disclosure and are subject to their own sustainability commitments. By working closely with them, Domtar not only responds to market requirements but also positions itself as a value-chain partner capable of supporting their sustainability goals.

(5.11.9.6) Effect of engagement and measures of success

Outcomes from this engagement included improved alignment of Domtar's forest management and fiber sourcing commitments with customer targets, enhanced credibility through transparent reporting, and expanded opportunities for collaboration on low impact innovations. This dialogue also reinforced trust, as customers gained confidence that Domtar's sustainability strategy is robust, science-informed, and compliance-ready.

Water

(5.11.9.1) Type of stakeholder

Select from:

☒ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information on environmental initiatives, progress and achievements

☒ Other education/information sharing, please specify :Provide customers with stakeholder survey to help Domtar identify water as a material topic

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 1-25%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Customers are a critical stakeholder group for Domtar in shaping and advancing our water management and marine resources goals. Their expectations for transparency directly influence our operational practices and long-term competitiveness. As water management increasingly drive their decisions, our engagement with customers ensures that Domtar remains aligned with their needs while contributing to broader sustainability efforts. Customer engagement was a critical input to evaluate Domtar's Impact, Risk, and Opportunity (IRO) statements enabling us to complete our Double Materiality Assessment (DMA). By integrating customer perspectives, we were able to validate where our operations and products intersect most directly with water risks and opportunities. This customer engagement is vital because it helps identify where Domtar's water management has the greatest potential to contribute to or be affected by impacts and risks. Customers are often downstream leaders in disclosure and are subject to their own sustainability commitments. By working closely with them, Domtar not only responds to market requirements but also positions itself as a value-chain partner capable of supporting their sustainability goals.

(5.11.9.6) Effect of engagement and measures of success

Outcomes from this engagement included improved alignment of Domtar's water management and marine resources commitments with customer targets, enhanced credibility through transparent reporting, and expanded opportunities for collaboration on low impact innovations. This dialogue also reinforced trust, as customers gained confidence that Domtar's sustainability strategy is robust, science-informed, and compliance-ready.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :Government, Indigenous Partners, Community Partners, Academic Partners, Industry Partners

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Run a campaign to encourage innovation to reduce environmental impacts

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 26-50%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

- ☒ 1-25%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Stakeholders across Domtar's value chain are essential in shaping and advancing our climate strategy. Their expectations for transparency, responsible practices, and measurable progress on emissions directly influence our operational decisions and long-term resilience. Because climate change impacts extend beyond our direct operations, we rely on meaningful engagement with Government, Indigenous communities, NGOs, regulators, academics, and local community partners to ensure that our strategy addresses the full spectrum of climate risks and opportunities across our value chain. This engagement was particularly important for Domtar's Impact, Risk, and Opportunity (IRO) statements and completion of our Double Materiality Assessment (DMA). Input from value chain stakeholders allowed us to validate where Domtar's operations intersect with the most significant transition and physical risks, as well as where opportunities exist for collaboration on innovation, and resilience-building. Their perspectives ensured that our disclosures reflect both financial materiality and the broader environmental and social impacts of our business.

(5.11.9.6) Effect of engagement and measures of success

The outcomes of this engagement were measurable. Our NGO and community partners enriched our climate and strategies. Indigenous and local community voices strengthened trust and provided guidance on adaptation in forested landscapes. Regulatory engagement helped ensure our disclosures are aligned with emerging compliance requirements. Overall, these interactions reinforced transparency and created opportunities for collaboration across the value chain. Ultimately, engaging stakeholders across our value chain has been a driving force in advancing Domtar's climate performance. Their influence ensures that our climate goals are grounded in stakeholder realities, supports responsible growth, and positions Domtar as a trusted partner in building resilience across the broader system in which we operate.

Forests

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :Government, Indigenous Partners, Community Partners, Academic Partners, Industry Partners

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services
- ☒ Encourage collaborative work in multi-stakeholder landscape towards initiatives for sustainable land-use goals

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 26-50%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Stakeholders across Domtar's value chain are essential in shaping and advancing our forest and fiber sourcing strategy. Their expectations for transparency, responsible practices, and certified products directly influence our operational decisions and long-term resilience. Because our forests impact our direct operations, we rely on meaningful engagement with Government, Indigenous communities, NGOs, regulators, academics, and local community partners to ensure that our strategy addresses the full spectrum of risks and opportunities across our value chain. This engagement was particularly important for Domtar's Impact, Risk, and Opportunity (IRO) statements and completion of our Double Materiality Assessment (DMA). Input from value chain stakeholders allowed us to validate where Domtar's operations intersect with the most significant transition and physical climate risks, as well as where opportunities exist for collaboration on emissions reductions, innovation, and resilience-building. Their perspectives ensured that our disclosures reflect both financial materiality and the broader environmental and social impacts of our business.

(5.11.9.6) Effect of engagement and measures of success

The outcomes of this engagement were measurable. Our NGO and community partners enriched our forest management and fiber sourcing strategies. Indigenous and local community voices strengthened trust and provided guidance on adaptation for our forest landscapes. Regulatory engagement helped ensure our disclosures are aligned with emerging compliance requirements. Overall, these interactions reinforced transparency and created opportunities for collaboration across the value chain. Ultimately, engaging stakeholders across our value chain has been a driving force in advancing Domtar's water management performance. Their influence ensures that our goals are grounded in stakeholder realities, supports responsible growth, and positions Domtar as a trusted partner in building resilience across the broader system in which we operate.

Water

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

☒ Encourage collaborative work in multi-stakeholder landscape towards initiatives for sustainable land-use goals

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 26-50%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Stakeholders across Domtar's value chain are essential in shaping and advancing our water management and marine resources goals. Their expectations for transparency and responsible practices, directly influence our operational decisions and long-term resilience. Because our water management impacts our direct operations, we rely on meaningful engagement with Government, Indigenous communities, NGOs, regulators, academics, and local community partners to ensure that our strategy addresses the full spectrum of risks and opportunities across our value chain. This engagement was particularly important for Domtar's Impact, Risk, and Opportunity (IRO) statements and completion of our Double Materiality Assessment (DMA). Input from value chain stakeholders allowed us to validate where Domtar's operations intersect with the most significant transition and physical water risks, as well as where opportunities exist for innovation, and resilience-building. Their perspectives ensured that our disclosures reflect both financial materiality and the broader environmental and social impacts of our business.

(5.11.9.6) Effect of engagement and measures of success

The outcomes of this engagement were measurable. Our NGO and community partners enriched our water management strategies. Indigenous and local community voices strengthened trust and provided guidance on adaptation for our water landscapes. Regulatory engagement helped ensure our disclosures are aligned with emerging compliance requirements. Overall, these interactions reinforced transparency and created opportunities for collaboration across the value chain. Ultimately, engaging stakeholders across our value chain has been a driving force in advancing Domtar's water management performance. Their influence ensures that our goals are grounded in stakeholder realities, supports responsible growth, and positions Domtar as a trusted partner in building resilience across the broader system in which we operate.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :NGO's

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☒ Share information about your products and relevant certification schemes

- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Collaborate with stakeholders in creation and review of your climate transition plan
- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 1-25%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

- ☒ 1-25%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

NGOs are a critical stakeholder group for Domtar in shaping and advancing our climate goals. Their expertise, independent oversight, and advocacy help ensure that our climate initiatives are credible, science-informed, and aligned with best practices. As climate-related issues increasingly influence regulatory expectations and public perception, engagement with NGOs ensures that Domtar's goals remain robust, transparent, and responsive to societal priorities while contributing to broader decarbonization efforts. Engagement with NGOs was a critical input for evaluating Domtar's Impact, Risk, and Opportunity (IRO) statements, enabling us to complete our Double Materiality Assessment (DMA). By incorporating NGO perspectives, we were able to validate where our operations and products intersect most directly with climate risks and opportunities, including both financial and environmental impacts. NGOs provided guidance on emerging climate standards, science-based targets, and ecosystem considerations, helping Domtar identify risks and opportunities that might otherwise be overlooked.

(5.11.9.6) Effect of engagement and measures of success

NGO engagement is important as they serve as trusted advisors and watchdogs, influencing policy, public expectations, and industry norms. Their insights allow Domtar to anticipate regulatory changes, strengthen disclosure practices, and prioritize initiatives that deliver meaningful climate impact. By working closely with NGOs, Domtar not only ensures the credibility and integrity of its climate goals but also positions itself as a responsible value-chain partner contributing to systemic decarbonization efforts.

Forests

(5.11.9.1) Type of stakeholder

Select from:

- ☒ Other value chain stakeholder, please specify :NGO's

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services
- ☒ Encourage collaborative work in multi-stakeholder landscape towards initiatives for sustainable land-use goals

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 1-25%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

NGOs are a critical stakeholder group for Domtar in shaping and advancing our forest operations and responsible fiber sourcing strategy. Their expertise, independent oversight, and advocacy help ensure that our forest initiatives are credible, science-informed, and aligned with best practices for sustainable sourcing and biodiversity protection. As forest-related issues increasingly influence regulatory expectations, supply chain standards, and public perception, engagement with NGOs ensures that Domtar's strategy remains robust, transparent, and responsive to societal priorities while supporting sustainable forest management across our value chain. Engagement with NGOs was a critical input for evaluating Domtar's Impact, Risk, and Opportunity (IRO) statements related to forest operations and fiber sourcing, enabling us to complete our Double Materiality Assessment (DMA). By incorporating NGO perspectives, we were able to validate where our operations and sourcing activities intersect most directly with environmental, social, and governance risks and opportunities. NGOs provided guidance on certification standards, deforestation-free sourcing, biodiversity considerations, and ecosystem stewardship, helping Domtar identify forest-related risks and opportunities that might otherwise be overlooked.

(5.11.9.6) Effect of engagement and measures of success

NGO engagement is important as they serve as trusted advisors and watchdogs, influencing policy, public expectations, and industry norms related to sustainable forestry. Their insights allow Domtar to anticipate regulatory changes, strengthen disclosure practices, and prioritize initiatives that deliver meaningful forest and biodiversity impact. By working closely with NGOs, Domtar not only ensures the credibility and integrity of its fiber sourcing strategy but also positions itself as a responsible value-chain partner contributing to sustainable forest management and ecosystem protection.

Water

(5.11.9.1) Type of stakeholder

Select from:

- ☒ Other value chain stakeholder, please specify :NGO's

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services
- ☒ Incentivize collaborative sustainable water management in river basins

(5.11.9.3) % of stakeholder type engaged

Select from:

- ☒ 1-25%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

NGOs are a critical stakeholder group for Domtar in shaping and advancing our water management and marine resources strategy. Their expertise, independent oversight, and advocacy help ensure that our water initiatives are credible, science-informed, and aligned with best practices for water protection. As water-related issues increasingly influence regulatory expectations, supply chain standards, and public perception, engagement with NGOs ensures that Domtar's strategy remains robust, transparent, and responsive to societal priorities while supporting sustainable water management across our value chain. Engagement with NGOs was a critical input for evaluating Domtar's Impact, Risk, and Opportunity (IRO) statements related to water management and marine resourcing, enabling us to complete our Double Materiality Assessment (DMA). By incorporating NGO perspectives, we were able to validate where our operations and activities intersect most directly

with environmental, social, and governance risks and opportunities. NGOs provided guidance on certification standards, biodiversity considerations, and ecosystem stewardship, helping Domtar identify water related risks and opportunities that might otherwise be overlooked.

(5.11.9.6) Effect of engagement and measures of success

NGO engagement is important as they serve as trusted advisors and watchdogs, influencing policy, public expectations, and industry norms related to sustainable water management. Their insights allow Domtar to anticipate regulatory changes, strengthen disclosure practices, and prioritize initiatives that deliver meaningful water impact. By working closely with NGOs, Domtar not only ensures the credibility and integrity of its water management strategy but also positions itself as a responsible value-chain partner contributing to sustainable water management and ecosystem protection.

[Add row]

(5.13) Has your organization already implemented any mutually beneficial environmental initiatives due to CDP Supply Chain member engagement?

	Environmental initiatives implemented due to CDP Supply Chain member engagement
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Domtar reports GHG emissions and includes climate-related activities for all manufacturing operations under our operational control.

Forests

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Domtar reports fiber procurement volumes and forest-related activities for all manufacturing operations under our operational control.

Water

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Domtar reports to CDP on water withdrawals, discharges, and consumption across all pulp, paper, packaging, and tissue operations under our operational control.

Plastics

(6.1.1) Consolidation approach used

Select from:

☒ Other, please specify :Not Reported

(6.1.2) Provide the rationale for the choice of consolidation approach

Domtar is not reporting on plastics in our 2024 CDP Questionnaire response as the company deems our use of and exposure to plastics in our value chain as low-risk relative to other commodities and environmental issues facing our business. The vast majority of our products are derived from renewable and biodegradable wood fiber. Domtar produces and offers customers fiber-based packaging that is recyclable and an alternative to plastic-based packaging.

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Domtar reports on biodiversity and related activities for all sourcing regions and manufacturing operations under our operational control.

[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☒ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?	Name of organization(s) acquired, divested from, or merged with	Details of structural change(s), including completion dates
	Select all that apply <input checked="" type="checkbox"/> Yes, a merger	The Paper Excellence Group acquired Domtar Corporation and Resolute Forest Products, and the consolidated entity has rebranded as Domtar.	The merger of the three legacy companies under the Domtar brand was completed on October 24, 2024.

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

☒ Yes, a change in methodology

☒ Yes, a change in boundary

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

The 2024 Domtar CDP disclosure presents a consolidated GHG Inventory of the legacy companies (Domtar, Resolute Forest Products, and Paper Excellence Canada). This GHG inventory harmonizes the emissions calculation approaches between the legacy companies in a few key ways. In terms of Scope 1 emissions, the choice of emission factors was harmonized; the Canadian National Inventory Report (1990-2023) was used for Canadian facilities, and the latest version of the US EPA GHG Emission Factor Hub (2025) was used for American Facilities. This resulted in a 2-4% change in facility emissions, depending on the types of sources present at the facility. The Scope 2 methodology was already consistent between companies and so did not change significantly in the reporting year. In terms of a change in boundary, landfill emissions were consistently included in the inventory where applicable and data was available (landfill emissions were previously included in some business units and excluded in others).

[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

	Base year recalculation	Base year emissions recalculation policy, including significance threshold	Past years' recalculation
	Select from: <input checked="" type="checkbox"/> No, because we do not have the data yet and plan to recalculate next year	<i>The integration of GHG Inventory data from all legacy businesses is in progress and will be complete within one year.</i>	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

- ☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- ☒ The Greenhouse Gas Protocol: Scope 2 Guidance
- ☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

☒ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☒ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

Purchased electricity, steam and heat emission factors are updated annually using the latest available factors. Emission factors for purchased electricity are sourced from the U.S. EPA eGRID for U.S. facilities (eGRID subregion-specific factors are used based on facility location) and National Inventory Reports submitted to the UN Framework Convention on Climate Change by the Canadian government for Canadian facilities (provincial-specific factors used). Scope 2 emissions from purchased steam at Domtar's mill in Rothschild, Wisconsin (USA), are based on supplier-specific greenhouse gas emission factors. Domtar's market-based Scope 2 emissions reflect the purchase or sale of renewable energy certificates (RECs). For mills not participating in a specific program, Scope 2 emissions are calculated using supplier-specific factors or the Green-e Residual Mix Emission Rate Tables for mills in the US, or residual mix emission factors provided within each Canadian province (if available).

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

☒ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Row 1

(7.4.1.1) Source of excluded emissions

Offices

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☒ Scope 1

☒ Scope 2 (location-based)

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☒ Emissions are not evaluated

(7.4.1.4) Relevance of location-based Scope 2 emissions from this source

Select from:

☒ Emissions are not evaluated

(7.4.1.10) Explain why this source is excluded

Emissions associated with offices are immaterial relative to the emissions from production facilities.

Row 2

(7.4.1.1) Source of excluded emissions

Refrigerants

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☒ Scope 1

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☒ Emissions excluded due to a recent acquisition or merger

(7.4.1.7) Date of completion of acquisition or merger

10/24/2024

(7.4.1.10) Explain why this source is excluded

This source is typically immaterial within the GHG inventory and has been excluded due to inconsistencies between legacy company calculation methodologies.

Row 3

(7.4.1.1) Source of excluded emissions

Makeup Lime

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☒ Scope 1

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☒ Emissions excluded due to a recent acquisition or merger

(7.4.1.7) Date of completion of acquisition or merger

10/24/2024

(7.4.1.10) Explain why this source is excluded

This source is typically immaterial within the GHG inventory and has been excluded due to inconsistencies between legacy company calculation methodologies.
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

2627307

(7.5.3) Methodological details

The 2023 base year was calculated by summing the most up-to-date versions of each legacy company's 2023 GHG Inventory.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

1359570

(7.5.3) Methodological details

The 2023 base year was calculated by summing the most up-to-date versions of each legacy company's 2023 GHG Inventory.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

1554133

(7.5.3) Methodological details

The 2023 base year was calculated by summing the most up-to-date versions of each legacy company's 2023 GHG Inventory.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

2505024

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**(7.5.1) Base year end**

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

955005

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 4: Upstream transportation and distribution**(7.5.1) Base year end**

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

383949

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

48154

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

494

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

21679

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

714584

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

3246138

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

3357274

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3 category 15: Investments

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

11664

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3: Other (upstream)

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.

Scope 3: Other (downstream)

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

2023 Scope 3 emissions inventory completed for all legacy companies, building on Resolute Forest Products' scope 3 inventory first established in 2009.
[Fixed row]

(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2771303

(7.6.3) Methodological details

This disclosure year presents the first consolidated Scope 1 GHG Inventory for Domtar Corporation, harmonizing the emission quantification methodology across all business units. Annualized quantities of fuel were multiplied by an emission factor specified in the Canada's National Inventory Report (NIR) for facilities located in Canada, and by an emission factor specified in the EPA GHG Emission Factor Hub (2025) for facilities located in the United States. Where relevant, the quantities of solid biomass fuels were converted to GJ using a site-specific HHV for accuracy.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2627307

(7.6.2) End date

12/31/2023

(7.6.3) Methodological details

This value is the sum of the most up-to-date versions of Legacy Resolute Forest Products, Legacy Domtar, and Legacy Paper Excellence Canada GHG Inventories.
[Fixed row]

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

1396975

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1506496

(7.7.4) Methodological details

This disclosure year presents the first consolidated Scope 2 GHG Inventory for Domtar Corporation, harmonizing the emission quantification methodology across all business units. In the case of location-based scope 2, annualized quantities of purchased power were multiplied by the provincial power consumption emission factor specified in the Canada's National Inventory Report (NIR) for facilities located in Canada, and by an e-grid emission factor specified in the EPA GHG Emission Factor Hub (2025) for facilities located in the United States. One facility purchases steam, and the emission factor is calculated and provided by the steam vendor. In the case of market-based scope 2, annualized quantities of purchased power were multiplied by a supplier-specific residual mix factor where available; otherwise, the green-e residual mix factor published in 2024; or in the cases where no residual mix factor is available, then the same location-based grid factor. Adjustments to the market-based scope 2 were made on a case-by-case basis for those sites that purchase RECs (two sites) or sell RECs (three sites).

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

1359570

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1554133

(7.7.3) End date

12/31/2023

(7.7.4) Methodological details

This value is the sum of the most up-to-date versions of Legacy Resolute Forest Products, Legacy Domtar, and Legacy Paper Excellence GHG Inventories.
[Fixed row]

(7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

2505024

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

*Quantities of purchased material are coming from the Domtar Business System and are mainly based on supplier and procurement data. Material categories included are purchased fiber and chemicals at the facility-level and cover the majority of the direct spending for materials. Procurement data is classified according to fiber type and only major chemicals consumed were prioritized in this evaluation. Upstream cradle-to-gate emission factors used are coming from sources such as the US Life Cycle Inventory Database, *NCASI's Screening Tool etc. A safety factor of 20% was added to the emissions associated to fiber, based on the accuracy estimate of the emission factors. Upstream emissions of externally purchased wood residuals burnt for energy are included in category 3 and transportation of raw material from suppliers to Domtar's sites are included in category 4. Based on the cut-off per the Scope 3 Standard, no emissions were associated with the procurement of recycled fibers. *National Council for Air and Stream Improvement (NCASI). (2023). Scope 3 Screening Tool (1.1a) [Software]. <https://ncasi.org>*

Capital goods

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

109202

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

The overall capital expenditure for the year comes from the Domtar's Business System. The emission factor for fabricated metal products (more conservative scenario) is taken from the EPA's "Supply Chain Emission Factors for US Industries Commodities and applied to the annual capital expenditure.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

955005

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

*Purchased fuel and electricity quantities are coming from the Domtar Business System. Emission factors for fuels are obtained from the NCASI Transportation Fuel Greenhouse Gas Module (GEM) and the *NCASI Screening Tool. Emissions associated with tire-derived fuel, sludge and produced wood residuals are considered to be 0 to be consistent with an allocation cut-off by classification. Emission factors for electricity are derived from regional grid transmission and distribution loss rates and eGRID emission factors (EPA). Electricity upstream emission loss is assumed to be 18% of the location-based Scope-2 emissions based on US Life Cycle Inventory, for carbon-intensive grids. *National Council for Air and Stream Improvement (NCASI). (2023). Scope 3 Screening Tool (1.1a) [Software]. <https://ncasi.org>.*

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

383949

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

Shipments of fiber and purchased chemical products come from Domtar's business systems and our 2022 chemical supplier survey. Upstream transportation of raw materials, as well as intermediate products between owned facilities are included in this category. GHG emissions from transportation were calculated based on the Global Logistics Emissions Council (GLEC) Methodology; well-to-wheel (WTW) distance-based emission factors are used to capture total emissions of a transport chain and emissions associated with the return of a vehicle are also included. For chemical transportation, key data were collected from major suppliers, although since the acquisition, this represents less than 5% of the integrated company's 2024 chemical consumption. Despite this, an extrapolation was done to ensure that transportation emissions of 100% of major chemicals purchased in 2024 were captured in this category.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

48154

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Waste-type-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

Volumes of solid waste and wastewater generated by the manufacturing operations of all facilities are being collected and monitored through Domtar Business System. Waste emissions from waste sent to third-parties are quantified based on the waste type and treatment method (landfilling, energy recovery, beneficial use, recycling etc.) Wastewater is treated in in-house wastewater treatment facilities and the sludge produced is used as fuel in our own mills and included in our scope 1 emissions or sold to third-party for landspreading and included in this category. Emission factors from the EPA Emission Factors Hub (2024 version) are used in conjunction with other credible sources.

Business travel

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

494

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Fuel-based method

☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

Distance travelled per means of transportation by employees in the reporting year were provided by travel agencies. Calculations cover emissions from business flights, train trips and use of rental cars. Emission factors are obtained from NCASI's Transportation Fuel Greenhouse Gas Module (GEM) tool, which covers both "well to pump" and combustion emissions. The fuel-based method was used for car rentals as fuel usage quantity data was available and this is the preferred methodology according to the GHG Protocol. For air and rail travel, the distance-based method was used.

Employee commuting

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

The total number of employees in all facilities and offices worldwide are obtained from the Human Resources department. Two different commuting scenarios were considered - one for office employees who have access to a wide variety of commuting modes and another for facilities' employees, with more limited commuting options. Transport mode-specific emission factors are coming from the EPA's GHG Emission Factors Hub (2024). GHG emissions from employee commute are based on information collected from employees and on some estimations. Transportation mode, travelled distances and number of working days for employees were extrapolated to cover all employees.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.5) Please explain

Upstream leased assets such as offices and warehouses are likely to have insignificant operational emissions and this category's evaluation was left out of the scope of the Scope 3 inventory. Domtar will evaluate the relevancy of downstream leased assets as we continue to improve our Scope 3 methodology.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

714584

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

Shipments of final sold products are coming from the Domtar Business System, with information on products shipped from all operating sites to customers. For each leg of transport, distance travelled, tonnage transported, and transportation mode information are available and used for emission calculations based on the Global Logistics Emissions Council (GLEC) Methodology. Well-to-wheel (WTW) emission factors are used to capture total emissions of a transport chain. Default GLEC emission and consumption factors were used with the exception of vessel factors that were adapted to our shipment reality with GLEC guidance.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

3246138

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

*Quantities of final sold products are coming from the Domtar Business System and include main as well as by-products. Product-specific, downstream processing factors and calculation methodology are adapted from the *NCASI's Screening Tool. Downstream processing of fiber sold internally between owned wood products facilities to our pulp, paper, tissue or packaging facilities are excluded from the corporate-level inventory to avoid double-counting of emissions (included in Scope 1 and 2 emissions). A safety factor of 20% was added to the emissions based on the accuracy estimate of the emission factors. *National Council for Air and Stream Improvement (NCASI). (2023). Scope 3 Screening Tool (1.1a) [Software]. <https://ncasi.org>*

Use of sold products

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Not relevant as pulp, paper products and lumber products do not generate emissions at the use stage. Emissions from the use-stage of by-products sold for energy is captured within other categories in the scope 3 inventory.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

3357274

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

*Quantities of final sold products are coming from the Domtar Business System and include main as well as by-products. Product-specific end-of-life emission factors and calculation methodology are adapted from the *NCASI's Screening Tool and the EPA GHG Emission Factors Hub, with consideration of disposal behavior in regions where our customers are located. End-of-life treatment of fiber sold internally between owned wood products facilities to our pulp, paper, tissue or packaging facilities are excluded from the corporate-level inventory to avoid double-counting of emissions. A safety factor of 20% was added to the emissions based on the accuracy estimate of the emission factors. *National Council for Air and Stream Improvement (NCASI). (2023). Scope 3 Screening Tool (1.1a) [Software]. <https://ncasi.org>*

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.5) Please explain

Domtar will evaluate the relevancy of downstream leased assets as we continue to improve our scope 3 methodology.

Franchises

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Not relevant, as Domtar does not own or operate franchises.

Investments

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

11664

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Investment-specific method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.5) Please explain

The Société en Commandite Scierie Opitciwan (sawmill), located in Obedjiwan, is an equity method investment in which we have 45% interest and no operational control. Activity data to calculate the facility's operational emissions are obtained directly from the facility upon request. Domtar has a 32% equity investment in Prisma, which is considered having insignificant operational emissions and was left out of the scope of the scope 3 inventory. Domtar also has a 43.6% investment at CelluloForce (co-located with Windsor mill) whose water, steam, electricity, chemicals are supplied by Domtar's Windsor facility. Therefore, CelluloForce's emissions are captured within the facility's own operational emissions.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Not relevant to Domtar

Other (downstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Please explain

Not relevant to Domtar

[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/31/2023

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

2505024

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

109202

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

955005

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

383949

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

48154

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

494

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

21679

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

714584

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

3246138

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

3357274

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

11664

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

*Scope 3 Categories 8 (Upstream leased assets), 11 (Use of sold products), 13 (Downstream leased assets), and 14 (Franchises) are not relevant to Domtar.
[Fixed row]*

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	<i>Select from:</i> <input checked="" type="checkbox"/> No third-party verification or assurance
Scope 3	<i>Select from:</i> <input checked="" type="checkbox"/> No third-party verification or assurance

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:

☒ Annual process

(7.9.1.2) Status in the current reporting year

Select from:

☒ Complete

(7.9.1.3) Type of verification or assurance

Select from:

☒ Reasonable assurance

(7.9.1.4) Attach the statement

VERREPT_Alma_2024_v.final.pdf

(7.9.1.5) Page/section reference

Attached please find at sample verification report for the Alma facility. See the summary on Page 2.

(7.9.1.6) Relevant standard

Select from:

☒ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

28

[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

☒ Increased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

No year-over-year changes were attributed specifically to a change in renewable energy consumption.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO₂e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

No year-over-year changes were attributed specifically to other emissions reduction activities.

Divestment

(7.10.1.1) Change in emissions (metric tons CO₂e)

180224

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

4

(7.10.1.4) Please explain calculation

This value accounts for the divestment of the Espanola facility from legacy Domtar, and the Amos and Baie-Comeau facilities from legacy Resolute Forest Products.

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

No changes were attributed to acquisitions since the prior year comparison includes acquired companies.

Mergers

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

No changes were attributed to mergers since the prior year comparison includes merged companies.

Change in output

(7.10.1.1) Change in emissions (metric tons CO₂e)

78146

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

2

(7.10.1.4) Please explain calculation

Year-over-year comparisons were conducted at the facility level, and a primary reason was attributed to each site. This calculation sums the absolute change in emissions attributable to a change in output. This is an important reason since emissions are strongly correlated with production.

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

139529

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

3

(7.10.1.4) Please explain calculation

Year-over-year comparisons were conducted at the facility level, and a primary reason was attributed to each site. This calculation sums the absolute change in emissions attributable to a change in methodology. Methodological changes were primarily the result of harmonizing emission factors between business units.

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☒ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

No changes were attributed to a change in boundary.

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO2e)

56205

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

1

(7.10.1.4) Please explain calculation

Year-over-year comparisons were conducted at the facility level and a primary reason was attributed to each site. This calculation sums the absolute change in emissions attributable to a change in physical operating conditions, including changes in fuel quality or availability, or changes in operating conditions related to maintenance or operating configurations.

Unidentified

(7.10.1.1) Change in emissions (metric tons CO2e)

177522

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

4

(7.10.1.4) Please explain calculation

Year-over-year comparisons were conducted at the facility level, and a primary reason was attributed to each site. This calculation sums the absolute change in emissions that was not attributable to a specific reason in this list.

Other

(7.10.1.1) Change in emissions (metric tons CO2e)

59227

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

1

(7.10.1.4) Please explain calculation

Year-over-year comparisons were conducted at the facility level and a primary reason was attributed to each site. This calculation sums the absolute change in emissions attributable to reasons not listed above. In most cases this was a decrease in fossil fuel consumption not attributable to an emission reduction activity or a change in renewable energy consumption.

[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

☒ Market-based

(7.13) Is biogenic carbon pertaining to your direct operations relevant to your current CDP climate change disclosure?

Select from:

☒ Yes

(7.13.1) Account for biogenic carbon data pertaining to your direct operations and identify any exclusions.

CO2 emissions from biofuel combustion (processing/manufacturing machinery)

(7.13.1.1) Emissions (metric tons CO2)

13742453

(7.13.1.2) Methodology

Select all that apply

☒ Default emissions factors

(7.13.1.3) Please explain

Quantities of biomass (hog fuel, bark, sludge, black liquor, lignin and other by-products of the manufacturing process) are combusted for process energy on-site. The quantities combusted are multiplied by default emission factors provided in the National Inventory Report (for Canadian sites) or the EPA Emission Factor Hub 2025 (US sites). Where possible, site-specific HHV values are used to convert from tonnes to GJ fuels.

CO2 emissions from biofuel combustion (other)

(7.13.1.1) Emissions (metric tons CO2)

0

(7.13.1.2) Methodology

Select all that apply

☒ Other, please specify :Not applicable

(7.13.1.3) Please explain

Not applicable
[Fixed row]

(7.14) Do you calculate greenhouse gas emissions for each agricultural commodity reported as significant to your business?

Timber products

(7.14.1) GHG emissions calculated for this commodity

Select from:

☒ Yes

(7.14.2) Reporting emissions by

Select from:

☒ Unit of production

(7.14.3) Emissions (metric tons CO₂e)

4168277

(7.14.4) Denominator: unit of production

Select from:

☒ Metric tons

(7.14.5) Change from last reporting year

Select from:

☒ About the same

(7.14.6) Please explain

Production and emissions remained consistent year over year.
[Fixed row]

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:

☒ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:

☒ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

2677774

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:

☒ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

23757

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:

☒ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

69772

(7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

[Add row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Canada	941014	394425	391439
United States of America	1830288	1002550	1115058

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply

☒ By business division

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

	Business division	Scope 1 emissions (metric ton CO2e)
Row 1	Wood Products	50064
Row 2	Pulp and Tissue	882425
Row 3	Paper and Packaging	1838814

[Add row]

(7.18) Do you include emissions pertaining to your business activity(ies) in your direct operations as part of your global gross Scope 1 figure?

Select from:

☒ Yes

(7.18.2) Report the Scope 1 emissions pertaining to your business activity(ies) and explain any exclusions. If applicable, disaggregate your agricultural/forestry by GHG emissions category.

Row 1

(7.18.2.1) Activity

Select from:
☒ Processing/Manufacturing

(7.18.2.3) Emissions (metric tons CO2e)

2771303

(7.18.2.4) Methodology

Select all that apply
☒ Default emissions factor

(7.18.2.5) Please explain

Includes Scope 1 emissions from stationary combustion, mobile equipment and on-site landfills at sawmills, pulp, tissue, paper, and packaging mills, as well as converting facilities.
[Add row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply
☒ By business division

(7.20.1) Break down your total gross global Scope 2 emissions by business division.

	Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	Wood Products	14986	14848
Row 2	Pulp and Tissue	760993	647509
Row 3	Paper and Packaging	620997	844140

[Add row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

2771303

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

1396975

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

1506496

(7.22.4) Please explain

Includes Scope 1 and 2 emissions from all wood products, pulp, tissue, paper, packaging, converting, and other product manufacturing facilities reported under the Consolidated Accounting Group for Domtar facilities.

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

0

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

0

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

0

(7.22.4) Please explain

Not applicable

[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

☒ Not relevant as we do not have any subsidiaries

(7.27) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

Row 1

(7.27.1) Allocation challenges

Select from:

☒ Diversity of product lines makes accurately accounting for each product/product line cost ineffective

(7.27.2) Please explain what would help you overcome these challenges

Pulp and paper mills are complex manufacturing systems, generally producing numerous different paper products (grade, finish, basis weight, etc.) market pulp and electricity that is sold to and purchased from the grid. We currently do not have energy metering in place that can be used to assign greenhouse gas emissions down to the product SKU level. We currently track total facility-level GHG emissions and divide by the total mass of product output to generate a facility-level GHG intensity factor. Domtar has and continues to work with customers on a case-by-case basis to help customers complete a Life Cycle Analysis or support Product Carbon Footprint data upon request. This type of work is currently highly customized and therefore not cost effective or readily scalable.
[Add row]

(7.28) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

(7.28.1) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

Select from:

☒ Yes

(7.28.2) Describe how you plan to develop your capabilities

Domtar currently has the ability to allocate Scope 1 and Scope 2 emissions to customers on a facility level basis (i.e. total Scope 1 & 2 are allocated evenly across total tonnes of product). Domtar is currently working on developing a process to more accurately assign Scope 3 emissions to customers and expects our capabilities to improve in the future.
[Fixed row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☒ More than 0% but less than or equal to 5%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☒ HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

40064211

(7.30.1.3) MWh from non-renewable sources

12178707

(7.30.1.4) Total (renewable + non-renewable) MWh

52242918.00

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

4702057

(7.30.1.3) MWh from non-renewable sources

6744435

(7.30.1.4) Total (renewable + non-renewable) MWh

11446492.00

Consumption of purchased or acquired steam

(7.30.1.1) Heating value

Select from:

☒ HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

367070

(7.30.1.3) MWh from non-renewable sources

27629

(7.30.1.4) Total (renewable + non-renewable) MWh

394699.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:

☒ HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

1091965

(7.30.1.4) Total (renewable + non-renewable) MWh

1091965.00

Total energy consumption

(7.30.1.1) Heating value

Select from:

☒ HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

46225303

(7.30.1.3) MWh from non-renewable sources

18950770

(7.30.1.4) Total (renewable + non-renewable) MWh

65176073.00

[Fixed row]

(7.30.6) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of heat	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of steam	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of cooling	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for co-generation or tri-generation	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

40431281

(7.30.7.3) MWh fuel consumed for self-generation of electricity

590213

(7.30.7.4) MWh fuel consumed for self-generation of heat

1006203

(7.30.7.5) MWh fuel consumed for self-generation of steam

3767034

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

35067831

(7.30.7.8) Comment

Biomass includes purchased or self-generated biomass, black liquor, lignin, bark, sludge, and the renewable portion of old corrugated cardboard rejects.

Other biomass

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

No unsustainable biomass is used

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.8) Comment

No other renewable fuels are used

Coal

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

381503

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

0

(7.30.7.5) MWh fuel consumed for self-generation of steam

0

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

381503

(7.30.7.8) Comment

Coal continues to be used only at one facility

Oil

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

409291

(7.30.7.3) MWh fuel consumed for self-generation of electricity

386

(7.30.7.4) MWh fuel consumed for self-generation of heat

227505

(7.30.7.5) MWh fuel consumed for self-generation of steam

11008

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

170393

(7.30.7.8) Comment

Oil includes light fuel oil, fuel oils #2, #5 and #6, Bunker C, and used/waste oil.

Gas

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

10689254

(7.30.7.3) MWh fuel consumed for self-generation of electricity

143

(7.30.7.4) MWh fuel consumed for self-generation of heat

1686716

(7.30.7.5) MWh fuel consumed for self-generation of steam

2319206

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

6683189

(7.30.7.8) Comment

Gas includes natural gas and propane

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

331588

(7.30.7.3) MWh fuel consumed for self-generation of electricity

0

(7.30.7.4) MWh fuel consumed for self-generation of heat

43143

(7.30.7.5) MWh fuel consumed for self-generation of steam

105492

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

182953

(7.30.7.8) Comment

Other non-renewable fuels includes tire-derived fuel, petroleum coke, and the non-renewable portion of old corrugated cardboard rejects.

Total fuel

(7.30.7.1) Heating value

Select from:

☒ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

52242918

(7.30.7.3) MWh fuel consumed for self-generation of electricity

590742

(7.30.7.4) MWh fuel consumed for self-generation of heat

2963567

(7.30.7.5) MWh fuel consumed for self-generation of steam

6202740

(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

42485868

(7.30.7.8) Comment

Total fuel
[Fixed row]

(7.30.9) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

Electricity

(7.30.9.1) Total Gross generation (MWh)

4782407

(7.30.9.2) Generation that is consumed by the organization (MWh)

3567488

(7.30.9.3) Gross generation from renewable sources (MWh)

4140558

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

3061504

Heat

(7.30.9.1) Total Gross generation (MWh)

2963567

(7.30.9.2) Generation that is consumed by the organization (MWh)

2963567

(7.30.9.3) Gross generation from renewable sources (MWh)

1006203

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

1006203

Steam

(7.30.9.1) Total Gross generation (MWh)

49674050

(7.30.9.2) Generation that is consumed by the organization (MWh)

49651088

(7.30.9.3) Gross generation from renewable sources (MWh)

39425078

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

39425078

Cooling

(7.30.9.1) Total Gross generation (MWh)

0

(7.30.9.2) Generation that is consumed by the organization (MWh)

0

(7.30.9.3) Gross generation from renewable sources (MWh)

0

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

0

[Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:

☒ United States of America

(7.30.14.2) Sourcing method

Select from:

☒ Physical power purchase agreement (physical PPA) with a grid-connected generator

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Solar

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

25158

(7.30.14.6) Tracking instrument used

Select from:

☒ US-REC

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ United States of America

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

2021

(7.30.14.10) Comment

Both our Hialeah and Sanford mills in Florida began participating in the SolarTogether program in July 2021. This community program offered by Florida Power & Lighting (FPL) helps local homes and businesses access emissions-free energy. FPL operates dozens of solar energy centers across the state, increasing the use of solar power on the energy grid and helping to offset the use of other non-renewable energy resources. On January 17, 2025, Florida Power & Light Company (ST) retired the 25,158 renewable energy certificates (RECs) on behalf of Domtar. The issuance and ownership of these RECs has been tracked in the North American Renewables Registry (NAR) using unique serial numbers to prevent double counting or double selling. Now that these RECs have been retired from the registry permanently, no one else can hold or retire the RECs.

Row 2

(7.30.14.1) Country/area

Select from:

☒ Canada

(7.30.14.2) Sourcing method

Select from:

☒ Default delivered electricity from the grid (e.g. standard product offering by an energy supplier) from a grid that is 95% or more low-carbon and where there is no mechanism for specifically allocating low-carbon electricity

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Renewable energy mix, please specify :92.14% hydro, 5.63% wind, 1.12% biomass, 0.62% nuclear, 0.48% fossil.

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

2967817

(7.30.14.6) Tracking instrument used

Select from:

☒ No instrument used

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Canada

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ Yes

(7.30.14.9) Commissioning year of the energy generation facility (e.g. date of first commercial operation or repowering)

1944

(7.30.14.10) Comment

All of our Quebec mills are supplied with electricity by Hydro-Quebec, a provincial government corporation providing its customers with electricity that is over 99% clean and renewable, mainly from hydroelectric generating stations. Hydro-Québec's generating fleet comprises 61 hydroelectric generating stations and 24 thermal plants with a total installed capacity of 37.2 GW. Its hydropower facilities also include 28 large reservoirs with a combined storage capacity of over 176 TWh, as well as 681 dams and 91 control structures.

Row 3

(7.30.14.1) Country/area

Select from:

☒ Canada

(7.30.14.2) Sourcing method

Select from:

☒ Default delivered electricity from the grid (e.g. standard product offering by an energy supplier) from a grid that is 95% or more low-carbon and where there is no mechanism for specifically allocating low-carbon electricity

(7.30.14.3) Energy carrier

Select from:

☒ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☒ Renewable energy mix, please specify :91% hydro, 3% wind, 4% biomass, 2% thermal

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

643807

(7.30.14.6) Tracking instrument used

Select from:

☒ No instrument used

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☒ Canada

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☒ No

(7.30.14.10) Comment

All of our British Columbia mills are supplied with electricity from BC Hydro, a provincial government corporation providing its customers with electricity that is 98% clean and renewable, mainly from hydroelectric generating stations. BC Hydro's generating fleet is comprised of 33 hydro plants, supported by 132 Independent Power Producer Projects.

[Add row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Canada

(7.30.16.1) Consumption of purchased electricity (MWh)

4267792

(7.30.16.2) Consumption of self-generated electricity (MWh)

1841823

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

6109615.00

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

2397066

(7.30.16.2) Consumption of self-generated electricity (MWh)

1848618

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

394699

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

4640383.00

[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.00056

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

4277799

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

7640000000

(7.45.5) Scope 2 figure used

Select from:

☒ Market-based

(7.45.9) Please explain

No prior year comparison is provided since this is the first year of presenting data for the newly consolidated Domtar Corporation.
[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:

☒ Other, please specify :% Renewable fuel as a total of fuel use

(7.52.2) Metric value

76.86

(7.52.3) Metric numerator

Renewable fuel as a % total fuel use

(7.52.4) Metric denominator (intensity metric only)

N/A

(7.52.5) % change from previous year

0.01

(7.52.6) Direction of change

Select from:

☒ Decreased

(7.52.7) Please explain

Insignificant change

Row 2

(7.52.1) Description

Select from:

☒ Energy usage

(7.52.2) Metric value

71.91

(7.52.3) Metric numerator

Renewable energy as a % of energy use

(7.52.4) Metric denominator (intensity metric only)

N/A

(7.52.5) % change from previous year

0.01

(7.52.6) Direction of change

Select from:

☒ Decreased

(7.52.7) Please explain

Insignificant change

Row 3

(7.52.1) Description

Select from:

☒ Other, please specify :Self-generated electricity (hydro and biomass)

(7.52.2) Metric value

4782

(7.52.3) Metric numerator

GWh of self-generated electricity

(7.52.4) Metric denominator (intensity metric only)

N/A

(7.52.5) % change from previous year

0.03

(7.52.6) Direction of change

Select from:

☒ Decreased

(7.52.7) Please explain

Insignificant change

[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☒ Absolute target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

☒ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

(7.53.1.4) Target ambition

Select from:

- ☒ Well-below 2°C aligned

(7.53.1.5) Date target was set

06/24/2022

(7.53.1.6) Target coverage

Select from:

- ☒ Business division

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

- | | |
|-----------------------------------------------------------------------|-----------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Methane (CH ₄) | <input checked="" type="checkbox"/> Sulphur hexafluoride (SF ₆) |
| <input checked="" type="checkbox"/> Nitrous oxide (N ₂ O) | <input checked="" type="checkbox"/> Nitrogen trifluoride (NF ₃) |
| <input checked="" type="checkbox"/> Carbon dioxide (CO ₂) | |
| <input checked="" type="checkbox"/> Perfluorocarbons (PFCs) | |
| <input checked="" type="checkbox"/> Hydrofluorocarbons (HFCs) | |

(7.53.1.8) Scopes

Select all that apply

- ☒ Scope 1
- ☒ Scope 2
- ☒ Scope 3

(7.53.1.9) Scope 2 accounting method

Select from:

☒ Market-based

(7.53.1.10) Scope 3 categories

Select all that apply

- | | |
|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Scope 3, Category 15 – Investments | <input checked="" type="checkbox"/> Scope 3, Category 10 – Processing of sold products |
| <input checked="" type="checkbox"/> Scope 3, Category 2 – Capital goods | <input checked="" type="checkbox"/> Scope 3, Category 5 – Waste generated in operations |
| <input checked="" type="checkbox"/> Scope 3, Category 6 – Business travel | <input checked="" type="checkbox"/> Scope 3, Category 12 – End-of-life treatment of sold products |
| <input checked="" type="checkbox"/> Scope 3, Category 7 – Employee commuting | <input checked="" type="checkbox"/> Scope 3, Category 4 – Upstream transportation and distribution |
| <input checked="" type="checkbox"/> Scope 3, Category 1 – Purchased goods and services | <input checked="" type="checkbox"/> Scope 3, Category 9 – Downstream transportation and distribution |
| <input checked="" type="checkbox"/> Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2) | |

(7.53.1.11) End date of base year

12/31/2015

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

1016196

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

1078370

(7.53.1.14) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target (metric tons CO2e)

425528

(7.53.1.15) Base year Scope 3, Category 2: Capital goods emissions covered by target (metric tons CO2e)

61677

(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

339802

(7.53.1.17) Base year Scope 3, Category 4: Upstream transportation and distribution emissions covered by target (metric tons CO2e)

263321

(7.53.1.18) Base year Scope 3, Category 5: Waste generated in operations emissions covered by target (metric tons CO2e)

80752

(7.53.1.19) Base year Scope 3, Category 6: Business travel emissions covered by target (metric tons CO2e)

1402

(7.53.1.20) Base year Scope 3, Category 7: Employee commuting emissions covered by target (metric tons CO2e)

13152

(7.53.1.22) Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target (metric tons CO2e)

313703

(7.53.1.23) Base year Scope 3, Category 10: Processing of sold products emissions covered by target (metric tons CO2e)

2831184

(7.53.1.25) Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target (metric tons CO2e)

1039287

(7.53.1.28) Base year Scope 3, Category 15: Investments emissions covered by target (metric tons CO2e)

378

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

5370186.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

7464752.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.35) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target as % of total base year emissions in Scope 3, Category 1: Purchased goods and services (metric tons CO2e)

100

(7.53.1.36) Base year Scope 3, Category 2: Capital goods emissions covered by target as % of total base year emissions in Scope 3, Category 2: Capital goods (metric tons CO2e)

100

(7.53.1.37) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target as % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

100

(7.53.1.38) Base year Scope 3, Category 4: Upstream transportation and distribution covered by target as % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e)

100

(7.53.1.39) Base year Scope 3, Category 5: Waste generated in operations emissions covered by target as % of total base year emissions in Scope 3, Category 5: Waste generated in operations (metric tons CO2e)

100

(7.53.1.40) Base year Scope 3, Category 6: Business travel emissions covered by target as % of total base year emissions in Scope 3, Category 6: Business travel (metric tons CO2e)

100

(7.53.1.41) Base year Scope 3, Category 7: Employee commuting covered by target as % of total base year emissions in Scope 3, Category 7: Employee commuting (metric tons CO2e)

100

(7.53.1.43) Base year Scope 3, Category 9: Downstream transportation and distribution emissions covered by target as % of total base year emissions in Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e)

100

(7.53.1.44) Base year Scope 3, Category 10: Processing of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 10: Processing of sold products (metric tons CO2e)

100

(7.53.1.46) Base year Scope 3, Category 12: End-of-life treatment of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 12: End-of-life treatment of sold products (metric tons CO2e)

100

(7.53.1.49) Base year Scope 3, Category 15: Investments emissions covered by target as % of total base year emissions in Scope 3, Category 15: Investments (metric tons CO2e)

100

(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2026

(7.53.1.55) Targeted reduction from base year (%)

41.5

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

4366879.920

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

652721

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

335053

(7.53.1.59) Scope 3, Category 1: Purchased goods and services emissions in reporting year covered by target (metric tons CO2e)

470031

(7.53.1.60) Scope 3, Category 2: Capital goods emissions in reporting year covered by target (metric tons CO2e)

37031

(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)

203383

(7.53.1.62) Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

174684

(7.53.1.63) Scope 3, Category 5: Waste generated in operations emissions in reporting year covered by target (metric tons CO2e)

34012

(7.53.1.64) Scope 3, Category 6: Business travel emissions in reporting year covered by target (metric tons CO2e)

343

(7.53.1.65) Scope 3, Category 7: Employee commuting emissions in reporting year covered by target (metric tons CO2e)

7943

(7.53.1.67) Scope 3, Category 9: Downstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

190567

(7.53.1.68) Scope 3, Category 10: Processing of sold products emissions in reporting year covered by target (metric tons CO2e)

1214915

(7.53.1.70) Scope 3, Category 12: End-of-life treatment of sold products emissions in reporting year covered by target (metric tons CO2e)

1050207

(7.53.1.73) Scope 3, Category 15: Investments emissions in reporting year covered by target (metric tons CO2e)

11664

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

3394780.000

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

4382554.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

99.49

(7.53.1.80) Target status in reporting year

Select from:

☒ Revised

(7.53.1.81) Explain the reasons for the revision, replacement, or retirement of the target

Following the integration of Domtar's legacy companies in October 2024, including Resolute Forest Products, the company committed to establishing a science-based reduction target for our Scope 1, 2 and 3 GHG emissions by 2026.

(7.53.1.82) Explain target coverage and identify any exclusions

Our 2030 objective is to decarbonize our operations, products and value chain by leveraging renewable, sustainable, fossil-free resources and efficient manufacturing processes - including Scope 1, 2 & 3 emissions.

(7.53.1.83) Target objective

Our targets include a 2026 goal to advance the development of our Scope 3 GHG emissions inventory for all Domtar legacy companies and to establish a science-based reduction target for our Scope 1, 2 and 3 GHG emissions by 2026.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Please refer to our 2024 Sustainability Report and our planned projects disclosed in this CDP report for more information. In 2026, we will report on the progress we will have made throughout 2025, and by the end of next year, our new target should be in place.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ Yes

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☒ No other climate-related targets

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:

☒ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	17	<i>Numeric input</i>
To be implemented	9	81083
Implementation commenced	4	51124
Implemented	6	81765
Not to be implemented	0	<i>Numeric input</i>

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☒ Process optimization

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

13265

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

1833000

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

6492000

(7.55.2.7) Payback period

Select from:

☒ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 16-20 years

(7.55.2.9) Comment

This is an aggregated sum of estimates related to four optimization projects implemented at pulp and paper mills in British Columbia and Quebec in 2024.
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☒ Employee engagement

(7.55.3.2) Comment

On May 6, 2025, we announced our 2030 Sustainability Strategy, including commitments to decarbonize our operations, products and value chain by leveraging renewable, sustainable, fossil-free resources and efficient manufacturing processes and to drive sustainability through product, process and value chain innovation, focusing on delivering measurable environmental and business value while advancing circular solutions. These commitments build on our legacy companies' long-established commitments, including Resolute Forest Products' SBTi-validated 2026 emissions reduction target.

Row 2

(7.55.3.1) Method

Select from:

☒ Partnering with governments on technology development

(7.55.3.2) Comment

Domtar is a member of the Alliance for Pulp & Paper Technology Innovation (APPTI) and Domtar participates in APPTI's Energy Efficiency and Innovation Team focusing on identifying platform technologies for the U.S Pulp & Paper Industry.

Row 3

(7.55.3.1) Method

Select from:

☒ Other :Investments in forest carbon sequestration

(7.55.3.2) Comment

Domtar, the American Forest Foundation and its partner, The Nature Conservancy, are supporting the Family Forest Carbon Program (FFCP) to enhance carbon sequestration in family-owned forest land across the United States. The FFCP represents a newer approach to climate change mitigation that taps into the carbon storage potential of family-owned forestland while creating a new market and source of income for the families that dedicate time and effort to their forest management. For more details, please go to: <https://forestfoundation.org/carbon>.

Row 4

(7.55.3.1) Method

Select from:

☒ Internal price on carbon

(7.55.3.2) Comment

Domtar's Canadian facilities are subject to carbon pricing under the relevant provincial carbon pricing schemes in British Columbia, Saskatchewan, Ontario and Quebec. The stated compliance price serves as an internal price of carbon for facilities in these jurisdictions, since GHG emission reductions result in cost savings under these programs. These carbon prices are considered in decision-making at facilities operating under one of the provincial cap-and-trade or the output-based pricing system (OBPS) facilities as the carbon costs or savings are material to project outcomes. For facilities without an explicit price on carbon, we are working on an implementation approach for a shadow price on carbon so that the impact of GHG emission reductions are considered within capital decision-making processes.

Row 6

(7.55.3.1) Method

Select from:

☒ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

In Canada, where our mills are subject to regulatory-driven carbon pricing programs, the mills have a heightened focus on identifying and implementing projects that improve energy efficiency and reduce fossil fuel use. Compliance programs create an important driver since high-performing mills may be able to generate credits under the output-based pricing system (OBPS) or cap-and-trade models and therefore generate revenue. We are developing more consistent reporting and forecasting tools to create additional visibility across the organization of current and future carbon costs to drive further investment in emission reduction projects.

Row 7

(7.55.3.1) Method

Select from:

☒ Other :Partnering with peers in R&D

(7.55.3.2) Comment

Performance BioFilaments Inc. is an R&D joint venture that was launched in 2014. Jointly owned with Mercer International Inc., Performance BioFilaments is working to develop commercial applications for cellulose filaments, a new source of sustainable biomaterial made from wood fiber that can improve the strength and durability of many commercial and consumer products found on the market today. The strength of cellulose filaments can be compared to that of synthetic reinforcement fibers made from non-renewable petroleum inputs. The difference is that cellulose filaments are entirely renewable and have a lower carbon footprint. In 2022, we launched a commercial plant specializing in the production of cellulose filaments at our Kénogami paper mill in Quebec that ramped up production through 2023. The C27 million investment in cellulose filaments represents an opportunity to enter non-traditional growth markets. Moreover, the cellulose filaments will be marketed with the help of Performance BioFilaments Inc.

Row 8

(7.55.3.1) Method

Select from:

☒ Internal finance mechanisms

(7.55.3.2) Comment

By finding a common ground between the decarbonization projects and maintenance of business and reliability projects, we significantly increase the internal investments in emissions reduction projects. Decarbonization projects that are tied to mill reliability projects are often fast-tracked and well-funded.

[Add row]

(7.68) Do you encourage your suppliers to undertake any agricultural or forest management practices with climate change mitigation and/or adaptation benefits?

Select from:

☒ Yes

(7.68.1) Specify which agricultural or forest management practices with climate change mitigation and/or adaptation benefits you encourage your suppliers to undertake and describe your role in the implementation of each practice.

Row 1

(7.68.1.1) Management practice reference number

Select from:

☒ MP1

(7.68.1.2) Management practice

Select from:

☒ Practices to increase wood production and forest productivity

(7.68.1.3) Description of management practice

Through the Four States Timberland Owners Association, Domtar provides small landowners with the necessary tools and information to manage their land sustainably. Our foresters provide guidance on best management practices, water quality, and wildlife management. Without this support and engagement, these landowners may not have the necessary resources to implement sustainable forest management practices independently. In 2024, 207 members were engaged in this association.

(7.68.1.4) Your role in the implementation

Select all that apply

☒ Financial

☒ Knowledge sharing

☒ Operational

☒ Procurement

(7.68.1.5) Explanation of how you encourage implementation

Domtar's foresters engage with landowners directly to walk them through sustainable forest management processes. We host educational events, provide forms, templates and policies for landowner use. One such example of resources supplied are Environmental and Social Risk Assessments. We also manage and fund an FSC group certificate to enable landowners to participate in the FSC certification system.

(7.68.1.6) Climate change related benefit

Select all that apply

- ☒ Increasing resilience to climate change (adaptation)
- ☒ Increase carbon sink (mitigation)
- ☒ Other, please specify :Improved forest management practices

(7.68.1.7) Comment

Services offer to members by FSTOA include: Site preparation, herbicide application, reforestation, timber sales, timber harvest monitoring, management plan preparation, timber valuation, real-time aerial photography, seedling order assistance, and insect and disease detection. These services are key to assisting landowners in managing their forestland sustainably and keeping as forests for future generations, a key in building climate resiliency. In January 2023, we hosted a landowner meeting covering a variety of topics noted above.

Row 3

(7.68.1.1) Management practice reference number

Select from:

- ☒ MP3

(7.68.1.2) Management practice

Select from:

- ☒ Other, please specify :Supporting family forest owners to access climate finance from carbon markets.

(7.68.1.3) Description of management practice

Domtar supports the American Forest Foundation's Family Forest Carbon Program. The Family Forest Carbon Program enables family forest owners to access climate finance from carbon markets—empowering them to help address climate change while earning income from their land.

(7.68.1.4) Your role in the implementation

Select all that apply

☒ Financial

☒ Knowledge sharing

(7.68.1.5) Explanation of how you encourage implementation

Domtar was one of the first forest products companies to support the Family Forest Carbon Program (FFCP) in its early development. FFCP's first pilot was launched in western Pennsylvania and has since expanded statewide and into West Virginia and western Maryland, resulting in 143 contracts representing 19,983 acres to date. Domtar supports the FFCP to assist enhancement of responsible forest management practice development in the Central Appalachians and the launch of the first FFCP learning pilot for small landowners in that region.

(7.68.1.6) Climate change related benefit

Select all that apply

☒ Increasing resilience to climate change (adaptation)

☒ Increase carbon sink (mitigation)

(7.68.1.7) Comment

In 2024, Paige Goff, VP Sustainability for Domtar, continued her tenure as a board member for American Forest Foundation. In her role on the board, Paige provides AAF with strategic guidance and support.

[Add row]

(7.68.2) Do you collect information from your suppliers about the outcomes of any implemented agricultural/forest management practices you have encouraged?

Select from:

☒ Yes

(7.70) Do you know if any of the management practices mentioned in 7.68.1 that were implemented by your suppliers have other impacts besides climate change mitigation/adaptation?

Select from:

☒ Yes

(7.70.1) Provide details of those management practices implemented by your suppliers that have other impacts besides climate change mitigation/adaptation.

Row 1

(7.70.1.1) Management practice reference number

Select from:

☒ MP1

(7.70.1.2) Overall effect

Select from:

☒ Positive

(7.70.1.3) Which of the following has been impacted?

Select all that apply

☒ Biodiversity

☒ Soil

(7.70.1.4) Description of impacts

Through the Four States Timberland Owners Association, Domtar provides small landowners with the necessary tools and information to manage their land sustainably. Our foresters provide guidance on best management practices, water quality, and wildlife management, including biodiversity and soil-related issues. Without this support and engagement, these landowners may not have the necessary resources to implement sustainable forest management practices independently. In 2023, 207 members were engaged in this association.

(7.70.1.5) Have any response to these impacts been implemented?

Select from:

☒ Yes

(7.70.1.6) Description of the response(s)

Our foresters provide guidance on best management practices, water quality, and wildlife management, including biodiversity and soil-related issues. Without this support and engagement, these landowners may not have the necessary resources to implement sustainable forest management practices independently.

[Add row]

(7.73) Are you providing product level data for your organization's goods or services?

Select from:

☒ No, I am not providing data

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☒ Yes

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 1

(7.74.1.1) Level of aggregation

Select from:

☒ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☒ Other, please specify :Generation and sale of renewable energy certificates (RECs) and renewable energy from hydropower and cogeneration of carbon-neutral biomass fuels

(7.74.1.3) Type of product(s) or service(s)

Other

☒ Other, please specify :Renewable electricity and Renewable Energy Certificates (RECs)

(7.74.1.4) Description of product(s) or service(s)

Renewable energy sales and/or renewable energy attributes (i.e. RECs).

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☒ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☒ Other, please specify :As defined by various renewable energy markets through which Domtar sells renewable electricity and renewable energy certificates (e.g., state renewable portfolio standards, Green-e, etc.)

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☒ Gate-to-gate

(7.74.1.8) Functional unit used

Metric ton CO2e/MWh

(7.74.1.9) Reference product/service or baseline scenario used

Carbon intensity of purchased electricity from electrical grid from within the region the REC is generated.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☒ Gate-to-gate

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

0.331

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

The t CO2e/MWh saved is calculated based on the MWh sold to the grid and the e-grid factors applicable to the mills from which the RECs are sold.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

0.31

Row 2

(7.74.1.1) Level of aggregation

Select from:

☒ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☒ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Other

☒ Other, please specify :Lumber and other wood products for the residential construction and home renovation markets, as well as for specialized structural and industrial applications

(7.74.1.4) Description of product(s) or service(s)

Domtar is a leading producer of lumber and other wood products for the residential construction and home renovation markets, as well as for specialized structural and industrial applications. With an annual production of 2.9 billion board feet, our 19 sawmills in Canada produce construction-grade stud and dimension spruce-pine-fir lumber and are a major source of wood chips for our pulp and paper mills, while our two sawmills in the U.S. produce construction-grade dimension lumber and decking products from locally sourced southern yellow pine. Our sawmills also supply wood residue to our other segments, to be used as fuel to produce electricity and steam based on renewable sources. Located in Quebec, our two remanufactured wood products facilities produce bed frame components, finger joints and furring strips, while our two engineered wood products facilities produce flooring I-joists for the construction industry.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☒ No

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

13.17

Row 3

(7.74.1.1) Level of aggregation

Select from:

☒ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☒ No taxonomy used to classify product(s) or service(s) as low carbon

(7.74.1.3) Type of product(s) or service(s)

Other

☒ Other, please specify :Wood pellets to replace coal in electricity production

(7.74.1.4) Description of product(s) or service(s)

Wood pellets help to avoid GHG emissions by replacing fossil fuels with renewable energy. As part of the Ontario government's 2002 commitment to develop a 100% coal-free electrical grid by 2015, Resolute Forest Products worked with the 200 MW capacity Ontario Power Generation (OPG) station in Atikokan, Ontario, to transition away from coal to carbon neutral biomass pellets manufactured at our Thunder Bay (Ontario) pellet plant. The plant completed its first full year of production in 2015, producing wood pellets made from residual sawdust, a sawmill by-product. The generating station's GHG emissions have been reduced through the use of a less carbon-intensive fuel.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☒ Yes

(7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☒ Estimating and Reporting the Comparative Emissions Impacts of Products (WRI)

(7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☒ Use stage

(7.74.1.8) Functional unit used

t CO₂e/GWh generation

(7.74.1.9) Reference product/service or baseline scenario used

The baseline scenario involves OPG using coal fuel to generate the same amount of electricity for its customers.

(7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☒ Use stage

(7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

312.5

(7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

Considering that residual biomass is carbon neutral, avoided emissions were calculated with the following data: 1 metric ton of wood pellets generates 4.8 MWh. Emission factors for coal are 88.34 kg of CO2/GJ, 0.0104 kg of CH4/GJ, and 0.0015 kg of N2O/GJ, while emission factors for wood pellets are 0 kg of CO2/kg, 0,576 kg of CH4/kg, and 0.077 kg of N2O/kg, with a global warming potential for CH4 of 25 and N2O of 298.

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

0.11

Row 4

(7.74.1.1) Level of aggregation

Select from:

☒ Product or service

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☒ No taxonomy used to classify product(s) or service(s) as low carbon

(7.74.1.3) Type of product(s) or service(s)

Other

☒ Other, please specify :Cellulose filament

(7.74.1.4) Description of product(s) or service(s)

We launched a commercial cellulose filament plant at our Kénogami (Quebec) paper mill in 2022. Cellulose filaments are a new, sustainable biomaterial made from wood fiber manufactured entirely from renewable sources. Integrating these fibers into commercial and everyday products results in lighter-weight, more fuel-efficient vehicles, more resilient coatings, and higher performance concrete.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☒ No

(7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

0.01
[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☒ No

C8. Environmental performance - Forests

(8.1) Are there any exclusions from your disclosure of forests-related data?

	Exclusion from disclosure
Timber products	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

(8.2) Provide a breakdown of your disclosure volume per commodity.

Timber products

(8.2.1) Disclosure volume (metric tons)

34871646

(8.2.2) Volume type

Select all that apply

- ☒ Produced
- ☒ Sourced

(8.2.3) Produced volume (metric tons)

22264377

(8.2.4) Sourced volume (metric tons)

12607269
[Fixed row]

(8.3) Provide details on the land you own, manage and/or control that is used to produce your disclosed commodities.

Timber products

(8.3.1) Type of control

Select from:

☒ Concessions/lease

(8.3.2) Country/area

Select from:

☒ Canada

(8.3.3) First-level administrative division

Select from:

☒ States/equivalent jurisdictions

(8.3.4) Specify the states or equivalent jurisdictions

The provinces of Ontario and Quebec

(8.3.5) Land type

Select from:

☒ Managed natural forests

(8.3.6) Area (hectares)

21722502

(8.3.7) Indicate if you can provide the volume produced on land you own, manage and/or control

Select from:

☒ Yes

(8.3.8) Volume produced on land you own, manage and/or control (metric tons)

21812663

(8.3.9) % area third-party certified

100

(8.3.10) Third-party certification scheme

Select all that apply

☒ FSC Forest Management certification

☒ SFI Forest Management standard

(8.3.11) Attach a list of production facility names and locations (optional)

Map of operations.pdf

Timber products

(8.3.1) Type of control

Select from:

☒ Own land

(8.3.2) Country/area

Select from:

☒ Canada

(8.3.3) First-level administrative division

Select from:

☒ States/equivalent jurisdictions

(8.3.4) Specify the states or equivalent jurisdictions

The province of Quebec

(8.3.5) Land type

Select from:

☒ Other land type, please specify :Area contains both managed natural forests and tree plantation

(8.3.6) Area (hectares)

159820

(8.3.7) Indicate if you can provide the volume produced on land you own, manage and/or control

Select from:

☒ Yes

(8.3.8) Volume produced on land you own, manage and/or control (metric tons)

325142

(8.3.9) % area third-party certified

100

(8.3.10) Third-party certification scheme

Select all that apply

- ☒ FSC Forest Management certification
- ☒ SFI Forest Management standard

(8.3.11) Attach a list of production facility names and locations (optional)

Map of operations.pdf

Timber products

(8.3.1) Type of control

Select from:

- ☒ Own land

(8.3.2) Country/area

Select from:

- ☒ United States of America

(8.3.3) First-level administrative division

Select from:

- ☒ States/equivalent jurisdictions

(8.3.4) Specify the states or equivalent jurisdictions

Tennessee

(8.3.5) Land type

Select from:

- ☒ Tree plantations

(8.3.6) Area (hectares)

(8.3.7) Indicate if you can provide the volume produced on land you own, manage and/or control*Select from:*☒ Yes**(8.3.8) Volume produced on land you own, manage and/or control (metric tons)**

16695

(8.3.9) % area third-party certified

100

(8.3.10) Third-party certification scheme*Select all that apply*☒ SFI Forest Management standard**(8.3.11) Attach a list of production facility names and locations (optional)***Map of operations.pdf***Timber products****(8.3.1) Type of control***Select from:*☒ Concessions/lease**(8.3.2) Country/area***Select from:*☒ United States of America

(8.3.3) First-level administrative division

Select from:

☒ States/equivalent jurisdictions

(8.3.4) Specify the states or equivalent jurisdictions

Tennessee

(8.3.5) Land type

Select from:

☒ Tree plantations

(8.3.6) Area (hectares)

16355

(8.3.7) Indicate if you can provide the volume produced on land you own, manage and/or control

Select from:

☒ Yes

(8.3.8) Volume produced on land you own, manage and/or control (metric tons)

109877

(8.3.9) % area third-party certified

100

(8.3.10) Third-party certification scheme

Select all that apply

☒ SFI Forest Management standard

(8.3.11) Attach a list of production facility names and locations (optional)

Map of operations.pdf

[Add row]

(8.4) Indicate if any of the land you own, manage and/or control was not used to produce your disclosed commodities in the reporting year.

Select from:

☒ Some of the land we own, manage and/or control is not used for production

(8.4.1) Provide details on the land you own, manage and/or control that was not used to produce your disclosed commodities in the reporting year.

Row 1

(8.4.1.1) Country/area

Select from:

☒ Canada

(8.4.1.2) Type of control

Select from:

☒ Publicly owned land

(8.4.1.3) Land type

Select from:

☒ Natural ecosystems with potential to be legally converted for commodity production

(8.4.1.4) Area (hectares)

(8.4.1.5) % covered by natural forests and other natural ecosystems

100

(8.4.1.6) Please explain

Forest management (FM) certification is in place on 100% of the woodlands Domtar owns or manages. In Ontario, we manage 4.09 million hectares of publicly-owned land, of which less than 0.5% is harvested annually. For the remaining 99.5% (4.07 million ha), FM certification helps ensure the sustainability of our fiber supply and other forest values, including biodiversity conservation and ecosystem services. In addition to FM certification, as required by provincial laws and regulations, Domtar prepares 20 or 25-year FM plans that are updated every five years in collaboration with government and other stakeholders, as well as strategies to safeguard biodiversity. The latter includes identification of protected areas, implementation of selected management practices (such as partial or progressive cuts, retention of trees for nesting, buffering around eagle nests and leaving riparian green belts), and natural and planted forest regeneration. In coordination with provincial governments, Domtar seeks to identify critical habitat areas for species of interest, such as the woodland caribou. Our goal is to ensure that our forest management plans protect such areas and minimize disturbance to the populations in question. Domtar conducted a review to determine the operational sites owned, leased and managed in – or adjacent to – protected areas and areas of high biodiversity value outside protected areas. As the vast majority of the woodlands we own or manage are located in Canada, this review was limited to forest management units (FMUs) in Quebec and Ontario. When considering forest management units along with adjacent protected areas, 43% of the total area we manage (25.1 million acres or 10.1 million hectares) is under regulated or non-regulated protection. Regulated protection includes nature reserves, national parks, wilderness areas, protected areas and other designations classified under the International Union for Conservation of Nature (IUCN) system, and recognized by international bodies like the United Nations. Nonregulated protection covers other measures that contribute to the conservation of biodiversity, including reserves, candidate lands for protected areas, wetlands, species-at-risk deferrals, and less productive forest areas that are not classified under the IUCN system.

Row 5**(8.4.1.1) Country/area**

Select from:

☒ Canada**(8.4.1.2) Type of control**

Select from:

☒ Own land**(8.4.1.3) Land type**

Select from:

☒ Natural ecosystems with potential to be legally converted for commodity production

(8.4.1.4) Area (hectares)

171240

(8.4.1.5) % covered by natural forests and other natural ecosystems

100

(8.4.1.6) Please explain

Domtar owns 171,240 ha of forest in Nova Scotia, Canada. These forests, while private property, are managed in the same way we manage public land. This involves maintaining independent forest management (FM) certification on 100% of these lands and harvesting wood sustainably. By doing so, we ensure the long-term viability of timber production while maintaining the various ecological characteristics that are vital to biodiversity and recreational use of the forest. Strict adherence to internationally recognized FM and chain of custody standards also provides our customers with the assurance that the wood fiber we utilize originates from responsible sources. In 2024, we maintained 100% certification of the forests we own in Canada, which are certified according to the Sustainable Forestry Initiative FM Standard. Domtar does not have a manufacturing facility in Nova Scotia, the volumes produced in this forest are not reflected in our disclosure volumes.
[Add row]

(8.5) Provide details on the origins of your sourced volumes.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Canada

(8.5.2) First level administrative division

Select from:

☒ States/equivalent jurisdictions

(8.5.3) Specify the states or equivalent jurisdictions

Provinces of Ontario, Quebec, New Brunswick, British Columbia, Alberta, Saskatchewan

(8.5.4) Volume sourced from country/area of origin (metric tons)

8925216

(8.5.5) Source

Select all that apply

- ☒ Independent smallholders
- ☒ Multiple contracted producers
- ☒ Contracted suppliers (processors)
- ☒ Other, please specify :Our own managed land, public land owned by the Provincial government

(8.5.6) List of supplier production and primary processing sites: names and locations (optional)

Map of operations.pdf

(8.5.7) Please explain

Much of the wood we consume in Canada originates from our own forest operation production, representing over 80% of the volume. The remaining 20% is sourced from private landowners, other commercial operations managing public land and local sawmills. In Quebec and Ontario roundwood is directed to our sawmills and then converted into lumber, chips, sawdust, shaving and bark. Chips are then directed to our pulp and paper operations and we also source volumes from external sawmills. In Western Canada all of the fiber for our operations is sourced from third party suppliers, including fiber from public land, large and smallholders, and Indigenous Organizations. We purchase both roundwood logs and sawmill residuals. 100% of all fiber volumes sourced by Domtar is, at minimum, risk assessed against FSC Controlled Wood requirements and national risk assessments.

Timber products

(8.5.1) Country/area of origin

Select from:

- ☒ United States of America

(8.5.2) First level administrative division

Select from:

☒ States/equivalent jurisdictions

(8.5.3) Specify the states or equivalent jurisdictions

Arkansas, Texas, Oklahoma, Louisiana, Missouri, Alabama, Mississippi, Kentucky, Tennessee, West Virginia, Ohio, Indiana, Illinois, Missouri, Pennsylvania, New York, Maryland, North Carolina, South Carolina, Wisconsin, Iowa, Michigan, Minnesota, New York, Vermont, New Hampshire, Maine, Idaho, Oregon, Montana, Washington, California, and Alaska

(8.5.4) Volume sourced from country/area of origin (metric tons)

3678311

(8.5.5) Source

Select all that apply

- ☒ Independent smallholders
- ☒ Multiple contracted producers
- ☒ Trader/broker/commodity market
- ☒ Contracted suppliers (processors)

(8.5.6) List of supplier production and primary processing sites: names and locations (optional)

Map of operations.pdf

(8.5.7) Please explain

In the US Domtar manages a small area of forest, but the majority of our fiber is sourced from third party suppliers. Fiber originates from public lands, commercial suppliers and TIMOs, sawmill residuals and small landowners. Fiber is sourced either in roundwood logs or sawmill residuals plus some market pulp. 100% of all fiber volumes sourced by Domtar is, at minimum, risk assessed against FSC Controlled Wood requirements and national risk assessments.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Uruguay

(8.5.2) First level administrative division

Select from:

☒ States/equivalent jurisdictions

(8.5.3) Specify the states or equivalent jurisdictions

Department of Colonia

(8.5.4) Volume sourced from country/area of origin (metric tons)

3742

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.6) List of supplier production and primary processing sites: names and locations (optional)

Map of operations.pdf

(8.5.7) Please explain

Domtar's tissue business sources a small volume of eucalyptus pulp originating in Uruguay. All pulp is certified to internationally recognized third-party chain of custody standards.

[Add row]

(8.7) Did your organization have a no-deforestation or no-conversion target, or any other targets for sustainable production/ sourcing of your disclosed commodities, active in the reporting year?

Timber products

(8.7.1) Active no-deforestation or no-conversion target

Select from:

☒ Yes, we have a no-conversion target

(8.7.2) No-deforestation or no-conversion target coverage

Select from:

☒ Organization-wide (including suppliers)

(8.7.5) Other active targets related to this commodity, including any which contribute to your no-deforestation or no-conversion target

Select from:

☒ Yes, we have other targets related to this commodity

[Fixed row]

(8.7.1) Provide details on your no-deforestation or no-conversion target that was active during the reporting year.

Timber products

(8.7.1.1) No-deforestation or no-conversion target

Select from:

☒ No-conversion

(8.7.1.2) Your organization's definition of "no-deforestation" or "no-conversion"

Our definition is in alignment with FSC's definition of conversion: "a permanent or long-term change to natural forest cover or High Conservation Value areas that is caused by human activity." All of Domtar's operations have been FSC certified long-term and have been consistently third-party audited against FSC Controlled Wood requirements. As part of Domtar's new Sustainability Strategy, we will implement additional monitoring measures to increase the robustness of this commitment.

(8.7.1.3) Cutoff date

Select from:

☒ 1993-1997

(8.7.1.4) Geographic scope of cutoff date

Select from:

☒ Applied globally

(8.7.1.5) Rationale for selecting cutoff date

Select from:

☒ Sector-wide agreement/recommendation

(8.7.1.6) Target date for achieving no-deforestation or no-conversion

Select from:

☒ <2017

[Add row]

(8.7.2) Provide details of other targets related to your commodities, including any which contribute to your no-deforestation or no-conversion target, and progress made against them.

Timber products

(8.7.2.1) Target reference number

Select from:

☒ Target 1

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7

Select from:

☒ Yes, this target contributes to our no-conversion target

(8.7.2.3) Target coverage

Select from:

☒ Organization-wide (including suppliers)

(8.7.2.4) Commodity volume covered by target (metric tons)

Select from:

☒ Disclosure volume

(8.7.2.5) Category of target & Quantitative metric

Other target category, please specify

☒ Other target metric, please specify :Establish integrated sustainability strategy with objectives, targets and KPIs

(8.7.2.8) Date target was set

12/01/2023

(8.7.2.9) End date of base year

12/31/2024

(8.7.2.10) Base year figure

0

(8.7.2.11) End date of target

(8.7.2.12) Target year figure

100

(8.7.2.13) Reporting year figure

100

(8.7.2.14) Target status in reporting year

Select from:

☒ Achieved

(8.7.2.15) % of target achieved relative to base year

100.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Kunming-Montreal Global Biodiversity Framework

☒ Sustainable Development Goals

(8.7.2.17) Explain target coverage and identify any exclusions

Domtar's first integrated Sustainability Strategy was completed and launched in May 2025. In 2024, Domtar was focused on stakeholder engagement and finalization of our targets. Many of our targets reflect the integration environment that Domtar is operating in. For example, baselines must be measured and set, and new policies established, in order to demonstrate meaningful progress. All of our operations are in the scope of this target, there are no exclusions. While Domtar has always been committed to responsible sourcing, we must establish the necessary traceability solutions, definitions, and policies to govern our sourcing practices.

(8.7.2.19) List the actions which contributed most to achieving or maintaining this target

Domtar's Sustainability Strategy is the outcome of nearly two years of extensive and collaborative work. While driven by our Sustainability team, subject matter experts from across our business units were closely involved. We began with careful self-assessment of our performance to date, looking at each legacy company's

strengths and best practices, and we identified and prioritized the sustainability-related risks and opportunities that matter most to Domtar's success. During our materiality assessment we also reached out extensively to customers, communities, business partners and other stakeholders. The unique perspectives of Indigenous peoples were also sought out. Input from hundreds of representatives helped us to better understand these external interests, concerns and goals and to build a truly stakeholder-driven sustainability strategy. Our Strategy is also guided by well-recognized external guidance and standards, with a particular focus on the reporting guidelines and requirements that will help ensure we are providing clear updates on our progress. Our sustainability-related dialogue with stakeholders is ongoing, and we will continue to refine our Strategy as best practices, stakeholder expectations and business realities evolve. This Strategy builds upon the strong foundations and initiatives already underway across our three legacy companies, recognizing the progress made and uniting our efforts under a cohesive and forward-looking framework. We believe that its successful pursuit is central to who we are as Domtar.

(8.7.2.20) Further details of target

Establish an objective, target and metrics focused on responsibly managed forests.

Timber products

(8.7.2.1) Target reference number

Select from:

☒ Target 2

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7

Select from:

☒ Yes, this target contributes to our no-conversion target

(8.7.2.3) Target coverage

Select from:

☒ Organization-wide (including suppliers)

(8.7.2.4) Commodity volume covered by target (metric tons)

Select from:

☒ Disclosure volume

(8.7.2.5) Category of target & Quantitative metric

Other target category, please specify

☒ Other target metric, please specify :Establish integrated sustainability strategy with objectives, targets and KPIs

(8.7.2.8) Date target was set

12/01/2023

(8.7.2.9) End date of base year

12/31/2024

(8.7.2.10) Base year figure

0

(8.7.2.11) End date of target

12/31/2024

(8.7.2.12) Target year figure

100

(8.7.2.13) Reporting year figure

100

(8.7.2.14) Target status in reporting year

Select from:

☒ Achieved

(8.7.2.15) % of target achieved relative to base year

100.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Sustainable Development Goals

(8.7.2.17) Explain target coverage and identify any exclusions

Domtar's first integrated Sustainability Strategy was completed and launched in May 2025. In 2024, Domtar was focused on stakeholder engagement and finalization of our targets. Many of our targets reflect the integration environment that Domtar is operating in. For example, baselines must be measured and set, and new policies established, in order to demonstrate meaningful progress. There are no exclusions from the scope of this target, however, the majority of our sourcing for our operations in the Paper and Packaging Business Unit is from small, private landowners. This is where we have the largest opportunity for impact, and accordingly, will be the primary focus of this target.

(8.7.2.19) List the actions which contributed most to achieving or maintaining this target

Domtar's Sustainability Strategy is the outcome of nearly two years of extensive and collaborative work. While driven by our Sustainability Team, subject matter experts from across our business units were closely involved. We began with careful self-assessment of our performance to date, looking at each legacy company's strengths and best practices, and we identified and prioritized the sustainability-related risks and opportunities that matter most to Domtar's success. During our materiality assessment we also reached out extensively to customers, communities, business partners and other stakeholders. The unique perspectives of Indigenous peoples were also sought out. Input from hundreds of representatives helped us to better understand these external interests, concerns and goals and to build a truly stakeholder-driven sustainability strategy. Our Strategy is also guided by well-recognized external guidance and standards, with a particular focus on the reporting guidelines and requirements that will help ensure we are providing clear updates on our progress. Our sustainability-related dialogue with stakeholders is ongoing, and we will continue to refine our Strategy as best practices, stakeholder expectations and business realities evolve. This Strategy builds upon the strong foundations and initiatives already underway across our three legacy companies, recognizing the progress made and uniting our efforts under a cohesive and forward-looking framework. We believe that its successful pursuit is central to who we are as Domtar.

(8.7.2.20) Further details of target

Establish an objective, target and metric to increase landowner engagement in our fiber value chain compared to a baseline on practices that deliver social, environmental and economic value.

Timber products

(8.7.2.1) Target reference number

Select from:

☒ Target 3

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7

Select from:

- ☒ Yes, this target contributes to our no-conversion target

(8.7.2.3) Target coverage

Select from:

- ☒ Organization-wide (direct operations only)

(8.7.2.4) Commodity volume covered by target (metric tons)

Select from:

- ☒ Disclosure volume

(8.7.2.5) Category of target & Quantitative metric

Third-party certification

- ☒ Other third-party certification target metric, please specify :100% of operations third-party certified

(8.7.2.7) Third-party certification scheme

Forest management unit/Producer certification

- ☒ FSC Controlled Wood certification
- ☒ FSC Forest Management certification
- ☒ PEFC Sustainable Forest Management certification
- ☒ SFI Forest Management standard

Chain-of-custody certification

- ☒ FSC Chain-of-Custody certification (any type)
- ☒ PEFC Chain-of-Custody (any type)
- ☒ SFI Chain-of-Custody – Percentage

(8.7.2.8) Date target was set

12/01/2021

(8.7.2.9) End date of base year

12/31/2023

(8.7.2.10) Base year figure

100

(8.7.2.11) End date of target

12/31/2024

(8.7.2.12) Target year figure

100

(8.7.2.13) Reporting year figure

100

(8.7.2.14) Target status in reporting year

Select from:

☒ Achieved and maintained

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Kunming-Montreal Global Biodiversity Framework

☒ Sustainable Development Goals

(8.7.2.17) Explain target coverage and identify any exclusions

All legacy companies that are now integrated as part of the Domtar brand have long been committed to third-party certification. Domtar was the first paper company in North America to achieve FSC certification, and former Resolute Forest Product was, and continues to be, the largest FSC forest management certificate holder globally. 100% of our managed forests and operations maintain third party certification to either FSC, SFI or PEFC certification with most certified to more than one scheme.

(8.7.2.19) List the actions which contributed most to achieving or maintaining this target

Domtar is committed to responsible forest management and fiber sourcing, and third-party certification is one of the ways we demonstrate this commitment. Maintaining certification and engaging in the governance of certification platforms requires significant resources and an active commitment to the principles of third-party certification. Domtar has two representatives on FSC National boards (FSC US and FSC Canada), participates in innovative projects and pilots by providing financial and in-kind support, and further engages in governance through standard consultations, workshops and other methods as the opportunities arise.

(8.7.2.20) Further details of target

Maintain our target on 100% third-party certification for our manufacturing facilities and forest operations.

Timber products

(8.7.2.1) Target reference number

Select from:

☒ Target 4

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7

Select from:

☒ Yes, this target contributes to our no-conversion target

(8.7.2.3) Target coverage

Select from:

☒ Organization-wide (including suppliers)

(8.7.2.4) Commodity volume covered by target (metric tons)

Select from:

☒ Disclosure volume

(8.7.2.5) Category of target & Quantitative metric

Other target category, please specify

☒ Other target metric, please specify :Policy development

(8.7.2.8) Date target was set

12/20/2023

(8.7.2.9) End date of base year

12/31/2024

(8.7.2.10) Base year figure

0

(8.7.2.11) End date of target

12/31/2024

(8.7.2.12) Target year figure

100

(8.7.2.13) Reporting year figure

100

(8.7.2.14) Target status in reporting year

Select from:

☒ Achieved

(8.7.2.15) % of target achieved relative to base year

100.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Kunming-Montreal Global Biodiversity Framework

☒ Sustainable Development Goals

(8.7.2.17) Explain target coverage and identify any exclusions

Domtar's first integrated Sustainability Strategy was completed and launched in May 2025. In 2024, Domtar was focused on stakeholder engagement and finalization of our targets. Many of our targets reflect the integration environment that Domtar is operating in. For example, baselines must be measured and set, and new policies established, in order to demonstrate meaningful progress. All of our operations are in the scope of this target, there are no exclusions. While Domtar has always been committed to responsible sourcing, we must establish the necessary traceability solutions, definitions, and policies to govern our sourcing practices.

(8.7.2.19) List the actions which contributed most to achieving or maintaining this target

Domtar's Sustainability Strategy is the outcome of nearly two years of extensive and collaborative work. While driven by our Sustainability team, subject matter experts from across our business units were closely involved. We began with careful self-assessment of our performance to date, looking at each legacy company's strengths and best practices, and we identified and prioritized the sustainability-related risks and opportunities that matter most to Domtar's success. During our materiality assessment we also reached out extensively to customers, communities, business partners and other stakeholders. The unique perspectives of Indigenous peoples were also sought out. Input from hundreds of representatives helped us to better understand these external interests, concerns and goals and to build a truly stakeholder-driven sustainability strategy. Our Strategy is also guided by well-recognized external guidance and standards, with a particular focus on the reporting guidelines and requirements that will help ensure we are providing clear updates on our progress. Our sustainability-related dialogue with stakeholders is ongoing, and we will continue to refine our Strategy as best practices, stakeholder expectations and business realities evolve. This Strategy builds upon the strong foundations and initiatives already underway across our three legacy companies, recognizing the progress made and uniting our efforts under a cohesive and forward-looking framework. We believe that its successful pursuit is central to who we are as Domtar.

(8.7.2.20) Further details of target

Establish an objective, target and metrics focused on a responsible wood and fiber sourcing and forest management policy, including monitoring and complaints mechanisms, in consultation with rightsholders and stakeholders.

[Add row]

(8.8) Indicate if your organization has a traceability system to determine the origins of your sourced volumes and provide details of the methods and tools used.

Timber products

(8.8.1) Traceability system

Select from:

☒ Yes

(8.8.2) Methods/tools used in traceability system

Select all that apply

- ☒ Chain-of-custody certification
- ☒ Supplier engagement/communication
- ☒ Internal traceability system
- ☒ Landscape and jurisdictional approaches

(8.8.3) Description of methods/tools used in traceability system

100% of Domtar's manufacturing facilities have a chain of custody tracking system compliant with the Sustainable Forestry Initiative (SFI), the Programme for the Endorsement of Forest Certification (PEFC) or the Forest Stewardship Council (FSC), all of which require that 100% of the fiber processed meets minimum due diligence requirements related to risks of illegal logging and other important sustainability issues. A combination of electronic systems allows us to trace the origin of the wood we procure to the management unit of harvest or sourcing area. These systems are also used to control 100% of the volume delivery to our mills and to determine accounts payable to forest contractors harvesting the wood, or other suppliers. Traceability is further implemented and achieved through a combination of our harvest and purchasing contracts with suppliers and our procurement software. When purchasing round wood logs, a contract is established with the supplier which lists the harvest location. This contract and associated harvest location is given a unique identifier within our procurement system. Each time a load is delivered to a mill it is received by linking it with the unique contract identifier. When purchasing other inputs, such as sawmill chip residuals in the US, we estimate a logical supply analysis surrounding the supplier's location by using harvest, trucking and fuel costs. Through this process we can identify a supply area from which the material originated. We maintain regular communication with our suppliers to ensure there are open channels of communication.

[Fixed row]

(8.8.1) Provide details of the point to which your organization can trace its sourced volumes.

Timber products

(8.8.1.1) % of sourced volume traceable to production unit

68

(8.8.1.2) % of sourced volume traceable to sourcing area and not to production unit

31

(8.8.1.3) % sourced volume traceable to country/area of origin and not to sourcing area or production unit

1

(8.8.1.4) % of sourced volume traceable to other point (i.e., processing facility/first importer) not in the country/area of origin

0

(8.8.1.5) % of sourced volume from unknown origin

0

(8.8.1.6) % of sourced volume reported

100.00

[Fixed row]

(8.9) Provide details of your organization's assessment of the deforestation-free (DF) or deforestation- and conversion-free (DCF) status of its disclosed commodities.

Timber products

(8.9.1) DF/DCF status assessed for this commodity

Select from:

☒ Yes, deforestation- and conversion-free (DCF) status assessed

(8.9.2) % of disclosure volume determined as DF/DCF in the reporting year

39

(8.9.3) % of disclosure volume determined as DF/DCF through a third-party certification scheme providing full DF/DCF assurance

18

(8.9.4) % of disclosure volume determined as DF/DCF through monitoring of production unit

28

(8.9.5) % of disclosure volume determined as DF/DCF through monitoring of sourcing area

16

(8.9.6) Is a proportion of your disclosure volume certified through a scheme not providing full DF/DCF assurance?

Select from:

☒ No

[Fixed row]

(8.9.1) Provide details of third-party certification schemes used to determine the deforestation-free (DF) or deforestation- and conversion-free (DCF) status of the disclosure volume, since specified cutoff date.

Timber products

(8.9.1.1) Third-party certification scheme providing full DF/DCF assurance

Forest management unit/Producer certification

☒ FSC Forest Management certification

(8.9.1.2) % of disclosure volume determined as DF/DCF through certification scheme providing full DF/DCF assurance

26

(8.9.1.3) Comment

As a forest manager and primary processor, one of our primary raw material inputs is roundwood logs, which we either harvest and process through our sawmills or purchase directly from the forest. This material is purchased with FSC 100% claims when available. Domtar currently manages seven FSC Forest Management certificates across our portfolio. An example certificate is uploaded, but due to constraints in the platform not all seven certificates are included. All certificates are publicly available on search.fsc.org.

(8.9.1.4) Certification documentation

Abitibi.pdf

Timber products

(8.9.1.1) Third-party certification scheme providing full DF/DCF assurance

Chain-of-custody certification

☒ FSC Chain-of-Custody certification (any type)

(8.9.1.2) % of disclosure volume determined as DF/DCF through certification scheme providing full DF/DCF assurance

18

(8.9.1.3) Comment

These volumes are purchased with a valid FSC Mix claim, and as a result provide assurance that the volumes do not originate from deforested or converted areas. The physical material is, at minimum, assessed against FSC Controlled Wood standards. Domtar currently manages six FSC chain of custody certificates across our

portfolio. An example certificate is uploaded, but due to constraints in the platform not all six certificates are included. All certificates are publicly available on search.fsc.org.

(8.9.1.4) Certification documentation

Domtar-Paper-Company-LLC-FSC-COC-w_CW-certificate-25.11.2024-1.pdf

Timber products

(8.9.1.1) Third-party certification scheme providing full DF/DCF assurance

Forest management unit/Producer certification

☒ FSC Controlled Wood

(8.9.1.2) % of disclosure volume determined as DF/DCF through certification scheme providing full DF/DCF assurance

100

(8.9.1.3) Comment

100% of all fiber purchased for Domtar's operations is assessed and third-party audited against FSC Controlled Wood requirements. All of our operations refer to the FSC National Risk Assessments for the US and Canada to identify areas with risk of conversion and implement the appropriate mitigation actions as required by FSC standards. Domtar currently manages six FSC Controlled Wood and Chain of Custody certificates across our portfolio. An example certificate is uploaded, but due to constraints in the platform not all six certificates are included. All certificates are publicly available on search.fsc.org.

(8.9.1.4) Certification documentation

Domtar-Paper-Company-LLC-FSC-COC-w_CW-certificate-25.11.2024-1.pdf

[Add row]

(8.9.3) Provide details of production unit monitoring used to determine deforestation-free (DF) or deforestation- and conversion-free (DCF) status of volumes since specified cutoff date.

Timber products

(8.9.3.1) % of disclosure volume determined as DF/DCF through monitoring of production unit

28.00

(8.9.3.2) Production unit monitoring approach

Select all that apply

☒ Ground-based monitoring system

(8.9.3.3) Description of production unit monitoring approach

Production unit is owned and managed by Domtar. Woodlands are third-party assessed through FSC or SFI FM certification. In addition, the majority of Domtar managed forests are publicly owned by provincial governments in Canada, which require 100% regeneration of all lands under management.

(8.9.3.4) DF/DCF status verified

Select from:

☒ Yes

(8.9.3.5) Type of verification

Select all that apply

☒ Third party

(8.9.3.6) % of your disclosure volume that is both determined as DF/DCF through monitoring of production unit and is verified as DF/DCF

28

(8.9.3.7) Explain the process of verifying DF/DCF status

Our woodlands are third-party audited against the FSC or SFI Forest Management standards. Canadian regulations require 100% regeneration of managed public lands.

(8.9.3.8) Attachment of verification (optional)

(8.9.4) Provide details of the sourcing area monitoring used to determine deforestation-free (DF) or deforestation- and conversion-free (DCF) status of volumes since specified cutoff date.

Timber products

(8.9.4.1) % of disclosure volume determined as DF/DCF through monitoring of deforestation and conversion within the sourcing area

16.00

(8.9.4.2) Monitoring approach used for determining that sourcing areas have no or negligible risk of deforestation or conversion

Select all that apply

- ☒ Consultation with rights holders and other stakeholders
- ☒ Pre-existing current and credible risk profiles/indexes
- ☒ Third-party assessment tool

(8.9.4.3) Description of approach, including frequency of assessment

Risk of deforestation and conversion is assessed through our due diligence system, which has been developed in alignment with the FSC Controlled Wood standards. We refer to the FSC National Risk assessments and recommended mitigation measures for the US and Canada. FSC Risk Assessments assess the risk of sourcing material from supply areas and establish mitigation measures to address those identified risks. They are developed through a multi-stakeholder process accounting for input from economic, environmental and social members.

(8.9.4.4) Countries/areas of origin

Select all that apply

- ☒ Canada
- ☒ United States of America

(8.9.4.5) Sourcing areas

U.S. States of: Arkansas, Texas, Oklahoma, Louisiana, Missouri, Alabama, Mississippi, Kentucky, Tennessee, West Virginia, Ohio, Indiana, Illinois, Missouri, Pennsylvania, New York, Maryland, North Carolina, South Carolina, Wisconsin, Iowa, Michigan, Minnesota, New York, Vermont, New Hampshire, Maine, Idaho, Oregon, Montana, Oregon, Washington, California and Alaska Canadian Provinces of: Ontario, Quebec, New Brunswick, British Columbia, Alberta and Saskatchewan

(8.9.4.6) DF/DCF status is verified

Select from:

☒ Yes

(8.9.4.7) Type of verification

Select all that apply

☒ Third party

(8.9.4.8) % of your disclosure volume that is both determined as DF/DCF through sourcing area monitoring and is verified as DF/DCF

16

(8.9.4.9) Explain the process of verifying DF/DCF status

Domtar's entire due diligence system including our assessment of risk, implementation of risk mitigation measures and calculation of our logical supply analysis, is third-party audited as part of our FSC certification. An example of that certification is attached.

(8.9.4.10) Attachment of verification (optional)

2024 FSC FM certificate.pdf

(8.9.4.11) Use of risk classification

The majority of areas of sourcing have been identified as low risk for conversion through the FSC National Risk Assessments for the US and Canada with the exception of minimal areas in the southeastern US, northwestern US and Western Canada. In the areas identified as specified risk for conversion the primary driver is urban development; as a result, Domtar implements risk mitigation and control measures to ensure we are not sourcing from high conservation areas which have

been deforested or converted. The risk mitigation measures we implement have been developed through the FSC National Risk Assessment development process. We have implemented written and binding agreements with our suppliers that: i) mitigate the risk that material supplied originates from forest areas converted into plantation or non-forest use; or ii) assure that if some conversion has occurred, that material supplied originates from limited and legal sources of conversion (e.g. conversion that results in conservation benefits, publicly approved changes in zoning in urban areas, etc.) and does not come from sources where the conversion threatens High Conservation Values.

(8.9.4.12) Attachment indicating risk classification for each sourcing area (optional)

FINAL - PEG Companies - Canada and US - Due Diligence for EUTR Compliance - 2024.pdf
[Fixed row]

(8.10) Indicate whether you have monitored or estimated the deforestation and conversion of other natural ecosystems footprint for your disclosed commodities.

Timber products

(8.10.1) Monitoring or estimating your deforestation and conversion footprint

Select from:

☒ No, but we plan to monitor or estimate our deforestation and conversion footprint in the next two years

(8.10.2) Primary reason for not monitoring or estimating deforestation and conversion footprint

Select from:

☒ No standardized procedure

(8.10.3) Explain why you do not monitor or estimate your deforestation and conversion footprint

Domtar has procedures, including a due diligence system, in place to ensure any timber or fiber sourced does not originate from land being converted to non-forest use. These procedures are third-party audited against FSC Controlled Wood standards annually. In the United States, we source wood from many small landowners making land use changes difficult to track at this scale. Domtar conducts significant landowner outreach and provides support to landowners to mitigate the risk of conversion of their forests to non-forest use after harvesting. However, we have not put into place a procedure or process to track instances of deforestation or conversion in the time after harvesting occurs. As part of our new Sustainability Strategy, we are planning to include a fiber tracking initiative which will include satellite monitoring. This will enable us to track our deforestation and conversion footprint and apply the learnings to our landowner engagement program. On the

public lands we manage in Canada we do monitor for deforestation or conversion as this responsibility is required by the regulatory framework. Provincial governments require 100% of all public land under management is regenerated after harvesting.

[Fixed row]

(8.11) For volumes not assessed and determined as deforestation- and conversion-free (DCF), indicate if you have taken actions in the reporting year to increase production or sourcing of DCF volumes.

	Actions taken to increase production or sourcing of DCF volumes
Timber products	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(8.11.1) Provide details of actions taken in the reporting year to assess and increase production/sourcing of deforestation- and conversion-free (DCF) volumes.

Timber products

(8.11.1.1) Action type

Select from:
☒ Working with smallholders

(8.11.1.2) % of disclosure volume that is covered by this action

24

(8.11.1.3) Indicate whether you had any major barriers or challenges related to this action in the reporting year

Select from:

☒ No

(8.11.1.5) Provide further details on the actions taken, their contribution to achieving DCF status, and any related barriers or challenges

Domtar implements landowner outreach activities aimed at engagement, awareness and knowledge building with landowners. These programs are particularly aimed at areas where there is risk of conversion and deforestation. One of the main goals of our landowner engagement program is to add additional value to their land in order to prevent land use change. Examples of our landowner outreach include managing and funding the Four States Timber Association FSC Group Certification which includes provide technical support to group members, collaborating and providing funding to FSC to engage landowners, funding for Forest Stewardship Guild for landowner outreach, and partnering with the American Forest Foundation on their Family Forest Carbon Program.

Timber products

(8.11.1.1) Action type

Select from:

☒ Increasing traceability

(8.11.1.2) % of disclosure volume that is covered by this action

100

(8.11.1.3) Indicate whether you had any major barriers or challenges related to this action in the reporting year

Select from:

☒ Yes

(8.11.1.4) Main measures identified to manage or resolve the challenges

Select all that apply

- ☒ Greater supplier awareness/engagement
- ☒ Investment in monitoring tools and traceability systems
- ☒ Improvement in data collection and quality

(8.11.1.5) Provide further details on the actions taken, their contribution to achieving DCF status, and any related barriers or challenges

Domtar is working towards compliance with EUDR requirements with the ultimate goal to achieve compliance across all of our supplies and facilities. This achievement requires full traceability of sources which have been traced to sourcing area but historically difficult to trace back to the production unit. Domtar has invested significant human and financial resources in this endeavor. We have partnered with NGIS Tracemark as a traceability and risk assessment solution provider and are rolling out this solution across all of our facilities. We are engaging with suppliers at all of our facilities to update contracts as necessary and gain more traceability. Once fully implemented we anticipate the majority of our facilities will have gained absolute traceability across all of our supplies.
[Add row]

(8.12) Indicate if certification details are available for the commodity volumes sold to requesting CDP Supply Chain members.

	Third-party certification scheme adopted	Certification details are available for the volumes sold to any requesting CDP Supply Chain members
Timber products	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(8.13) Does your organization calculate the GHG emission reductions and/or removals from land use management and land use change that have occurred in your direct operations and/or upstream value chain?

Timber products

(8.13.1) GHG emissions reductions and removals from land use management and land use change calculated

Select from:
☒ No, but plan to do so in the next two years

(8.13.2) Primary reason your organization does not calculate GHG emissions reductions and removals from land use management and land use change

Select from:

- ☒ No standardized procedure

(8.13.3) Explain why your organization does not calculate GHG emissions reductions and removals from land use management and land use change

Domtar is awaiting the finalization and public release of the GHG Protocol's Land Sector and Removals Guidance, expected in 2025, to assess how measurement and quantification will be conducted.

[Fixed row]

(8.14) Indicate if you assess your own compliance and/or the compliance of your suppliers with forest regulations and/or mandatory standards, and provide details.

(8.14.1) Assess legal compliance with forest regulations

Select from:

- ☒ Yes, from both suppliers and owned/managed/controlled land

(8.14.2) Aspects of legislation considered

Select all that apply

- ☒ Labor rights
- ☒ Land use rights
- ☒ Third parties' rights
- ☒ Environmental protection
- ☒ Human rights protected under international law
- ☒ Tax, anti-corruption, trade and customs regulations
- ☒ Forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting
- ☒ The principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples

(8.14.3) Procedure to ensure legal compliance

Select all that apply

- ☒ Certification
- ☒ First party audits
- ☒ Third party audits
- ☒ Second party audits
- ☒ Third party databases
- ☒ Ground-based monitoring
- ☒ Supplier self-declaration
- ☒ Remote sensing or other geospatial monitoring

(8.14.5) Please explain

Domtar has adopted a wide range of policies, regularly reviewed and updated, to promote strong governance, best practices, diversity and sustainability. Often going beyond what the law requires, our policies set the tone for the way we conduct our business at all levels and at all times, providing a solid foundation for working smart. One such policy is our Code of Business Conduct and Ethics which requires compliance with all applicable laws. In assessing our suppliers, we rely on third-party certification schemes and risk assessments which include requirements for compliance with all forest regulations and mandatory standards.

[Fixed row]

(8.15) Do you engage in landscape (including jurisdictional) initiatives to progress shared sustainable land use goals?

	Engagement in landscape/jurisdictional initiatives
	Select from: <input checked="" type="checkbox"/> Yes, we engage in landscape/jurisdictional initiatives

[Fixed row]

(8.15.1) Indicate the criteria you consider when prioritizing landscapes and jurisdictions for engagement in collaborative approaches to sustainable land use and provide an explanation.

(8.15.1.1) Criteria for prioritizing landscapes/jurisdictions for engagement

Select all that apply

- ☒ Ability to contribute to/ build on existing landscape/jurisdictional initiatives
- ☒ Organization has operational presence in area
- ☒ Opportunity to protect and restore natural ecosystems
- ☒ Response to regulation
- ☒ Risk of fires

(8.15.1.2) Explain your process for prioritizing landscapes/jurisdictions for engagement

The examples shared here are based on Domtar operations in the Canadian provinces of Quebec and Ontario where over 90% of our forest management is done on public land. In Quebec, government is responsible for planning the forest management strategy and to consult stakeholders, while Domtar executes the management plan and manages woodlands operations. In Ontario, there are different forest tenure models. Domtar directly manages forests under one of these models, the Sustainable Forest License (SFL), which is granted for a period of up to 20 years and subject to a five-year review. Domtar is also a board member and shareholder of two entities it does not manage directly – an SFL and a forest management corporation – both of which provide the company fiber from Crown Land. Ecosystem-based management is an ecological approach applied to the sustainable development of the forests we manage directly and indirectly in Quebec and Ontario. Its implementation aims to ensure the biodiversity and viability of ecosystems by reducing the gaps between the managed forest and forestland deemed natural. The approach aims at the same time, to meet socio-economic objectives, while respecting social values linked to the forest environment. This management approach seeks to replicate natural disturbances by establishing a level of harvest equivalent to what is typically disturbed by fires or insect outbreaks at the landscape level. Similarly, unharvested areas remain part of the landscape in order to mimic natural disturbances. These areas are left primarily for ecological reasons but also serve to meet the different social uses of the forest. This approach is also used to partly ensure the protection of forests against large-scale fires. Indeed, forest management strategy aims to harvest wood before it reaches its end-of-life where it becomes a source of fuel for wildfires. In addition to the active management of its forests, Quebec also has an objective to protect 25% of its territory by 2025 and 30% by 2030. With responsibility for woodland operations under Quebec's forest management plans, Domtar is an important stakeholder involved in all stages of the development of the strategy and works closely with all relevant stakeholders on the ground. Ontario has permanently protected over 11% of its total area with 717 parks, conservation areas, reserves and other effective area-based conservation measures (OECM) (28.4 million acres or 11.5 million hectares).

[Fixed row]

(8.15.2) Provide details of your engagement with landscape/jurisdictional initiatives to sustainable land use during the reporting year.

Row 1

(8.15.2.1) Landscape/jurisdiction ID

Select from:

☒ LJ1

(8.15.2.2) Name of initiative

Conservation Agreement for Boreal Caribou in Ontario

(8.15.2.3) Country/area

Select from:

☒ Canada

(8.15.2.4) Name of landscape or jurisdiction area

Province of Ontario, boreal forest

(8.15.2.5) Attach public information about the initiative (optional)

En_Caribou Conservation Agreement - 2022April07_230pm_Revised - 2022April15_CLEAN_April21.pdf

(8.15.2.6) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ Yes

(8.15.2.7) Area covered by the initiative (ha)

3860190

(8.15.2.8) Type of engagement

Select all that apply

- ☒ Convener: Leads or facilitates the design, set-up, and high-level management of the initiative
- ☒ Partner: Shares responsibility with other stakeholders to manage and implement actions.
- ☒ Implementer: Executes actions based on the collective goals
- ☒ Funder: Provides full or partial financial resources

(8.15.2.9) Engagement start year

2022

(8.15.2.10) Engagement end year

Select from:

☒ Please specify :2027

(8.15.2.11) Estimated investment over the project period

200000

(8.15.2.12) Landscape goals supported by engagement

Environmental

☒ Biodiversity protected and/or restored

☒ Increased and/or maintained protected areas

☒ Natural ecosystems conserved and/or restored

(8.15.2.13) Organization actions supporting initiative

Participate in planning and multi-stakeholder alignment

☒ Co-design and develop goals, strategies and an action plan with timebound targets and milestones for the initiative

☒ Collaborate on management/land use planning in the landscape/jurisdiction

Build community and multi-stakeholder capacities

☒ Engage stakeholders on importance of conservation, restoration and/or rehabilitation

(8.15.2.14) Type of partners engaged in the initiative design and implementation

Select all that apply

☒ Sub-national government

- ☒ Indigenous peoples
- ☒ Local communities
- ☒ NGO and/or civil society
- ☒ Producers

(8.15.2.15) Description of engagement

Domtar directly manages forests under a Sustainable Forest License (SFL), which is granted by the Ontario government. Domtar is also a board member and shareholder of two entities it does not manage directly – an SFL and a forest management corporation – both of which provide the company fiber from Crown Land where the Conservation Agreement is in effect. Members of our team are also directly involved with the Caribou Conservation Plan, including an employee who sits on the governing table. Guidance from the Plan has been fully incorporated into 18 of the 20 Forest Management Plans that intersect with caribou ranges in Ontario.

(8.15.2.16) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

- ☒ Yes, progress is monitored using an internally defined framework

(8.15.2.17) State the achievements of your engagement so far and how progress is monitored

All of the initiatives and actions we undertake build upon our core commitment to protect, manage and renew the forest through sustainable forest management. To ensure forests continue to provide timber sustainably, harvest volumes are set according to strict limits and standards, based in part on the Caribou Conservation Plan. Ontario determines sustainable harvest levels using the best available scientific data, taking into account caribou conservation. The Plan is monitored by the provincial government with our collaboration and input.

(8.15.2.18) Claims made

Select from:

- ☒ No, we are not making any claims, and we do not plan to within the next two years

Row 2

(8.15.2.1) Landscape/jurisdiction ID

Select from:

- ☒ LJ2

(8.15.2.2) Name of initiative

Carapace Project

(8.15.2.3) Country/area

Select from:

☒ Canada

(8.15.2.4) Name of landscape or jurisdiction area

Province of Quebec, region of Mauricie

(8.15.2.5) Attach public information about the initiative (optional)

Carapace Project.pdf

(8.15.2.6) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ Yes

(8.15.2.7) Area covered by the initiative (ha)

271

(8.15.2.8) Type of engagement

Select all that apply

☒ Partner: Shares responsibility with other stakeholders to manage and implement actions.

☒ Funder: Provides full or partial financial resources

(8.15.2.9) Engagement start year

2021

(8.15.2.10) Engagement end year

Select from:

☒ Please specify :2024

(8.15.2.11) Estimated investment over the project period

60000

(8.15.2.12) Landscape goals supported by engagement

Environmental

- ☒ Biodiversity protected and/or restored
- ☒ Ecosystem services maintained and/or enhanced
- ☒ Natural ecosystems conserved and/or restored

(8.15.2.13) Organization actions supporting initiative

Participate in planning and multi-stakeholder alignment

- ☒ Collaborate on management/land use planning in the landscape/jurisdiction

Build community and multi-stakeholder capacities

- ☒ Engage stakeholders on importance of conservation, restoration and/or rehabilitation

Enhance government and capacity

- ☒ Support enforcement of land-use and/or zoning plans

(8.15.2.14) Type of partners engaged in the initiative design and implementation

Select all that apply

- ☒ Sub-national government
- ☒ NGO and/or civil society

☒ Private sector

(8.15.2.15) Description of engagement

In 2021, Domtar committed C\$60,000 over four years to support Nature Conservancy of Canada's (NCC) Carapace Project and to help educate the public about turtle conservation. We are also partners on other NCC initiatives and interact with them regularly on ongoing projects.

(8.15.2.16) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

☒ Yes, progress is monitored using an internally defined framework

(8.15.2.17) State the achievements of your engagement so far and how progress is monitored

The Nature Conservancy of Canada monitors the project in collaboration with local partners on a regional basis, and a reporting tool related to the monitoring is available at the following address: <https://carapace.ca/en/#info>

(8.15.2.18) Claims made

Select from:

☒ No, we are not making any claims, but we plan to in the next two years

[Add row]

(8.15.3) For each of your disclosed commodities, provide details on the disclosure volume from each of the landscapes/jurisdictions you engage in.

Row 1

(8.15.3.1) Landscape/jurisdiction ID

Select from:

☒ LJ1

(8.15.3.2) Does any of your produced and/or sourced commodity volume originate from this landscape/jurisdiction, and are you able/willing to disclose information on this volume?

Select from:

☒ Yes, we do produce/source from this landscape/jurisdiction, and we are able/willing to disclose volume data

(8.15.3.3) Commodity

Select from:

☒ Timber products

(8.15.3.4) % of disclosure volume from this landscape/jurisdiction

10

Row 2

(8.15.3.1) Landscape/jurisdiction ID

Select from:

☒ LJ2

(8.15.3.2) Does any of your produced and/or sourced commodity volume originate from this landscape/jurisdiction, and are you able/willing to disclose information on this volume?

Select from:

☒ Yes, we do produce/source from this landscape/jurisdiction, and we are able/willing to disclose volume data

(8.15.3.3) Commodity

Select from:

☒ Timber products

(8.15.3.4) % of disclosure volume from this landscape/jurisdiction

1

[Add row]

(8.16) Do you participate in any other external activities to support the implementation of policies and commitments related to deforestation, ecosystem conversion, or human rights issues in commodity value chains?

Select from:

☒ Yes

(8.16.1) Provide details of the external activities to support the implementation of your policies and commitments related to deforestation, ecosystem conversion, or human rights issues in commodity value chains

Row 1

(8.16.1.1) Commodity

Select all that apply

☒ Timber products

(8.16.1.2) Activities

Select all that apply

☒ Involved in industry platforms

☒ Engaging with communities

☒ Engaging with non-governmental organizations

(8.16.1.3) Country/area

Select from:

☒ United States of America

(8.16.1.4) Subnational area

Select from:

☒ Not applicable

(8.16.1.5) Provide further details of the activity

We have developed a global sustainability strategy to guide our new integrated company, but we know we can't do it on our own. We want to work hand-in-hand with our partners to build meaningful and lasting partnerships based on building trust through transparency and accountability. Our partnerships will help us to challenge our views, learn from each other and create positive change through collaboration. Example partnerships include: - American Forest Foundation (AFF) We support three AFF programs: Family Forest Carbon Program, Habitat Improvement Program and National Fish and Wildlife Foundation Partnership. All three programs focus on addressing different challenges faced by small forest holders in the eastern US. - The Nature Conservancy (TNC) We support TNC's Forest Restoration Program which addresses climate change by restoring tree cover to formerly forested areas. - Nature Conservancy Canada (NCC) A long-term partnership between Domtar and The Nature Conservancy of Canada (NCC) has been established with the execution of the largest private land conservation agreement in Canadian history. A large private forest tract in Ontario that was managed as a wood supply to Domtar's mills will now be managed for research and conservation by NCC. The 1,450 square kilometers of boreal forest is recognized for its ecosystem and abundant wildlife.

Row 2

(8.16.1.1) Commodity

Select all that apply

☒ Timber products

(8.16.1.2) Activities

Select all that apply

☒ Involved in industry platforms

(8.16.1.3) Country/area

Select from:

☒ Canada

(8.16.1.4) Subnational area

Select from:

☒ Not applicable

(8.16.1.5) Provide further details of the activity

We engage with stakeholders in a variety of ways in order to better understand their interests, concerns and goals, including townhall meetings, public consultations, and surveys for customers/operations. Domtar is actively engaged in Sustainable Forestry Initiative (SFI) implementation committees in all regions where we operate mills. These SFI implementation committees promote the certification of the land base as well as the use of best management practices, among other things. Domtar holds two positions on the FSC board of directors in Canada and the US. In addition, Domtar participates in the Environmental Paper Assessment Tool (EPAT) and Book Chain Project, membership-based online comparison tools that allow paper buyers to compare the eco-performance of their suppliers. Our rankings assure customers that the wood fiber we use comes from responsible sources. Domtar is a member of Two Sides, alongside members from the print and paper value chain, including forestry, inks, chemicals, and others. In 2022, we joined the in development of Working Forests Initiative, a partnership supported by U.S. companies and trade associations that seeks to promote broad range of benefits generated by working forests, and in 2023, we committed annual contributions of US\$250,000 through 2027. We also continued to engage in Forestry for the Future, an initiative led by the Forest Products Association of Canada (FPAC) that highlights how Canadian forestry supports a more sustainable future, and in 2023, we committed annual contributions of C\$750,000 through 2027. We are also involved in Canada's Clean 50 initiative, through which several members of our team have been recognized for their leadership on climate change and the National Council for Air and Stream Improvement, Inc. (NCASI), a scientific association organized to serve the forest products industry as a center of excellence providing unbiased, scientific research and technical information necessary to achieve the industry's environmental and sustainability goals.

Row 5

(8.16.1.1) Commodity

Select all that apply

☒ Timber products

(8.16.1.2) Activities

Select all that apply

☒ Other, please specify :Engaging with policymakers or governments

(8.16.1.3) Country/area

Select from:

☒ Canada

(8.16.1.4) Subnational area

Select from:

☒ Not applicable

(8.16.1.5) Provide further details of the activity

Domtar is committed to ensuring a voice in public policy discussions that impact company operations, employees, communities and partners. In 2024, we continued efforts to oppose softwood lumber duties and support consensus-based, pragmatic discussions with the goal of reaching a long-term settlement to the softwood lumber dispute between the U.S. and Canada. We also continue to work with forest industry associations and a range of stakeholders in the U.S. and Canada in an effort to provide stakeholder awareness on facts related to the boreal forest and to address anti-boreal legislation in the U.S. Generally, our focus is on ensuring Canadian public policy is focused on harmonizing federal and provincial regulatory and legal frameworks – as well as interministerial collaboration within governments – with respect to land and threatened species management. In 2024, Domtar continued to collaborate with Quebec’s Ministry of Natural Resources and Forests as a member of the Table of Partners for the Implementation of the Management of Woodland Caribou Habitat Action Plan, as well as the Forest Regime revision governmental led process. In Ontario, we continue to support a coalition of mayors from northern and Indigenous communities to provide the provincial government with feedback on the management of species at risk. In 2024, we also collaborated regularly with government officials on implementing the province's new forests strategy, Sustainable Growth. At the federal level in Canada, we continue to work with Environment and Climate Change Canada on its proposed action plan to protect and contribute to the recovery of the woodland caribou, as well as Natural Resources Canada.

Row 6

(8.16.1.1) Commodity

Select all that apply

☒ Timber products

(8.16.1.2) Activities

Select all that apply

☒ Other, please specify :Engaging with policymakers or governments

(8.16.1.3) Country/area

Select from:

☒ United States of America

(8.16.1.4) Subnational area

Select from:

☒ Not applicable

(8.16.1.5) Provide further details of the activity

We are also engaged in U.S. public affairs affecting our industry. In 2024, we continued our efforts to oppose U.S. softwood lumber duties and support consensus-based, pragmatic discussions with the goal of reaching a long-term settlement to the softwood lumber dispute between the U.S. and Canada. We also continue to work with forest industry associations and a range of stakeholders in the U.S. and Canada in an effort to provide stakeholder awareness on facts related to the boreal forest and to address anti-boreal legislation in the U.S. We are also focused on maintaining our best-in-class participation in the Resolute political action committee (PAC) at the U.S. operations level by communicating regularly with PAC participants. Our PAC promotes free trade, sustainable forest management and boreal-sourced products, among other things.

Row 7

(8.16.1.1) Commodity

Select all that apply

☒ Timber products

(8.16.1.2) Activities

Select all that apply

☒ Engaging with communities

☒ Other, please specify :Agreement with local Indigenous group

(8.16.1.3) Country/area

Select from:

☒ Canada

(8.16.1.4) Subnational area

Select from:

☒ Not applicable

(8.16.1.5) Provide further details of the activity

Resolute Forest Products (now Domtar) has a 24-year joint venture with the Band Council of Obedjiwan at the Opitciwan (Quebec) sawmill. In 2024, we worked to put into action the 2023 agreement in principle with the Atikamekw Council of Obedjiwan to supply wood byproducts from the Opitciwan (Quebec) sawmill to the Opitciwan thermal plant. These byproducts help generate renewable energy through bioenergy processes. Additionally, we installed a wood kiln at the Opitciwan sawmill, designed to improve the efficiency of lumber drying and enhance product quality. This collaborative effort not only contributes to reducing waste and promoting sustainable energy use but also strengthens economic ties with the Atikamekw community, fostering job creation and local resource management.

Row 8

(8.16.1.1) Commodity

Select all that apply

☒ Timber products

(8.16.1.2) Activities

Select all that apply

☒ Funding research organizations

(8.16.1.3) Country/area

Select from:

☒ Canada

(8.16.1.4) Subnational area

Select from:

☒ Not applicable

(8.16.1.5) Provide further details of the activity

In Quebec, we support research organizations and initiatives that promote the use of the wood products we manufacture, as well as public awareness programs that inform the general public about the impact of our operations, including forestry's relatively small carbon footprint. Domtar's annual C\$70,000 research grant to the FORAC Research Consortium in Quebec City (Quebec) helps explore ways to improve and align product capacity with short-term product needs, including developing tools to permit the joint planning and operation of wood supply systems. FORAC is a partnership between forest products industry stakeholders and Laval University that brings together specialists. In 2021, we renewed a five-year, C\$175,000 commitment to fund Laval University's educational leadership chair in Indigenous forestry via the Quebec Forest Industry Council, and in 2023, we awarded 42,000 in student scholarships. Joining leading forestry experts from the

Université of Québec in Chicoutimi (UQAC), Domtar is part of a new research consortium focused on the forest products industry's most pressing issues, including: carbon management and climate change; the impact of human activity on the biodiversity of forest ecosystems; understanding the impact of human activities and natural disturbances on forest growth and ecosystems; learning to optimize renewable resources and derive value from by-products. In 2023, we committed to providing an annual contribution of C\$350,000 annually over five years for a total of C\$1.75 million to support the consortium's research. In 2021, the company also completed a five-year C\$1-million donation for the creation of an industrial research chair sponsored by the Natural Sciences and Engineering Research Council of Canada. Along with the National Council for Air and Stream Improvement (NCASI) and some 40 Canadian partners, Resolute Forest Products began making an annual C\$7,000 contribution in 2022 to a five-year, C\$6 million research initiative that combines the expertise of university researchers with the experience of companies, provinces, First Nations and non-government organizations. The team from the University of Quebec in Outaouais (UQO), led by Dr. Christian Messier, is field-testing a new approach to forest management that leverages the natural strengths of forest ecosystems to positively shift the public's perception of forestry while improving the resilience and adaptability of our forests.

[Add row]

(8.17) Is your organization supporting or implementing project(s) focused on ecosystem restoration and long-term protection?

Select from:

☒ Yes

(8.17.1) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify any measured outcome(s).

Row 1

(8.17.1.1) Project reference

Select from:

☒ Project 1

(8.17.1.2) Project type

Select from:

☒ Reforestation

(8.17.1.3) Expected benefits of project

Select all that apply

☒ Restoration of natural ecosystem(s)

(8.17.1.4) Is this project originating any carbon credits?

Select from:

☒ No

(8.17.1.5) Description of project

Domtar's Ontario woodlands conduct forest renewal activities in accordance with the requirements of long-term Sustainable Forest Licences (SFLs) granted by the province for up to 20 years each. The SFL for a Crown forest provides the right to harvest as well as requirements SFL holders must meet, such as the responsibility for renewal. A specific forest renewal requirement of the SFL is to carry out renewal and maintenance activities in the Licensed Area, on behalf of the Minister, which are necessary to provide for the sustainability of the Crown forests. In Northwestern Ontario, the company manages four SFLs covering the Black Spruce, Dog River-Matawin, English River and Caribou Forests.

(8.17.1.6) Where is the project taking place in relation to your value chain?

Select all that apply

☒ Project based in area with direct operations

(8.17.1.7) Start year

2021

(8.17.1.8) Target year

Select from:

☒ Indefinitely

(8.17.1.9) Project area to date (Hectares)

3700

(8.17.1.10) Project area in the target year (Hectares)

(8.17.1.11) Country/Area*Select from:*☒ Canada**(8.17.1.12) Latitude**

49.412323

(8.17.1.13) Longitude

-91.6553

(8.17.1.14) Monitoring frequency*Select from:*☒ Annually**(8.17.1.15) Total investment over the project period (currency)**

410000

(8.17.1.16) For which of your expected benefits are you monitoring progress?*Select all that apply*☒ Restoration of natural ecosystem(s)**(8.17.1.17) Please explain**

Many types of activities occur annually in the Ontario woodlands we manage, but the most recognized is tree planting. In 2022, 9,123,613 seedlings were planted across the four SFLs the company manages. Examples of other activities include cone collection, seed extraction and seed storage, site preparation, seeding and tending. As well, a site visit of each area to be renewed occurs and a Registered Professional Forester assigns the renewal prescription. Annually, an investment of over 10 million in forest renewal supports the sustainability of Ontario's Crown forests, with 4.1 spent on tree planting alone in 2022. As a service provider, Domtar

also planted 3,408,048 trees in the Boundary Waters Forest at a cost of roughly 1 million. Note: the project area, 3,700 hectares, is an estimate based on 2500 trees/hectare.

Row 2

(8.17.1.1) Project reference

Select from:

☒ Project 2

(8.17.1.2) Project type

Select from:

☒ Threatened and protected species

(8.17.1.3) Expected benefits of project

Select all that apply

☒ Net gain in biodiversity and ecosystem integrity

(8.17.1.4) Is this project originating any carbon credits?

Select from:

☒ No

(8.17.1.5) Description of project

The Nature Conservancy of Canada's (NCC) Carapace Project focuses on preventing declines in turtle populations by protecting adult turtles and reducing risks of road collisions. In 2021, Resolute Forest Products (now Domtar) committed C\$60,000 over four years to support the Carapace Project and to help educate the public about turtle conservation. The forests in which we operate contain various concentrations of biodiversity, and turtles are an important part of these ecosystems. Turtles eat plants and insects, scavenge dead fish while also serving as a source of food for predators. Moreover, they occupy several types of habitats through the year, dispersing seeds in their waste. When they nest, they prefer sand or loose gravel, both of which can be found in abundance along rural roads. Female turtles travel more frequently to find a good spot to lay their eggs. According to Carapace, if there is an increase of more than 5% in annual mortality, a long-term population decline of most turtle species is possible. This is where individual action can make a difference. Domtar is a partner in the deployment of the project in the Mauricie region of Quebec where our FP Mauricie sawmill and Mauricie woodlands operations are located. A part of the project deployment zone includes private lands that

belong to Domtar. Our employees and other stakeholders - including users of the forests we manage, such as cottagers, sight seers and anglers - are encouraged to report turtle sightings on the Carapace website, and if turtles are in immediate danger, help the turtles cross the road.

(8.17.1.6) Where is the project taking place in relation to your value chain?

Select all that apply

☒ Project based in area with direct operations

(8.17.1.7) Start year

2021

(8.17.1.8) Target year

Select from:

☒ 2024

(8.17.1.9) Project area to date (Hectares)

0

(8.17.1.10) Project area in the target year (Hectares)

0

(8.17.1.11) Country/Area

Select from:

☒ Canada

(8.17.1.12) Latitude

47.213508

(8.17.1.13) Longitude

-72.888622

(8.17.1.14) Monitoring frequency

Select from:

☒ Six-monthly or more frequently

(8.17.1.15) Total investment over the project period (currency)

60000

(8.17.1.16) For which of your expected benefits are you monitoring progress?

Select all that apply

☒ Net gain in biodiversity and ecosystem integrity

(8.17.1.17) Please explain

Monitoring is based on the goal of reducing declines in turtle populations. Identifying the locations of adult turtles, and female populations in particular, is at the center of monitoring, in addition to tracking engagement with the public and reducing risks of road collisions. According to Carapace, if there is an increase of more than 5% in annual mortality, a long-term population decline of most turtle species is possible. This is monitoring can make a difference. The forests in which we operate contain various concentrations of biodiversity, and turtles are an important part of these ecosystems. Turtles eat plants and insects, scavenge dead fish while also serving as a source of food for predators. Moreover, they occupy several types of habitats through the year, dispersing seeds in their waste.

Row 3

(8.17.1.1) Project reference

Select from:

☒ Project 3

(8.17.1.2) Project type

Select from:

☒ Forest ecosystem restoration

(8.17.1.3) Expected benefits of project

Select all that apply

☒ Restoration of natural ecosystem(s)

(8.17.1.4) Is this project originating any carbon credits?

Select from:

☒ No

(8.17.1.5) Description of project

Domtar's Ontario woodlands team implemented a project of Other Effective area-based Conservation Measures (OECMs) on public lands, in collaboration with First Nations, local citizen committees, a "protected area advisory" team and the provincial Ministry of Natural resources. The values for conservation in these areas focus on moose habitat, wetlands and peatlands, HVCs (high conservation value) areas and a variety of other ecological and archaeological values. The proposed protected areas on the Dog River Matawin forest management unit is a total of 85,763 ha.

(8.17.1.6) Where is the project taking place in relation to your value chain?

Select all that apply

☒ Project based in area with direct operations

(8.17.1.7) Start year

2024

(8.17.1.8) Target year

Select from:

☒ Indefinitely

(8.17.1.9) Project area to date (Hectares)

85763

(8.17.1.10) Project area in the target year (Hectares)

85763

(8.17.1.11) Country/Area

Select from:

☒ Canada

(8.17.1.12) Latitude

0

(8.17.1.13) Longitude

0

(8.17.1.14) Monitoring frequency

Select from:

☒ Six-monthly or more frequently

(8.17.1.15) Total investment over the project period (currency)

0

(8.17.1.16) For which of your expected benefits are you monitoring progress?

Select all that apply

☒ Other, please specify :permanent conservation

(8.17.1.17) Please explain

The Dog River Matawin forest is a large forest area and the proposed OECM is over 85,000 HA, as such it is not possible to identify a specific lat/long. Canada has ambitious conservation goals, including the protection and conservation of land and water, as well as halting and reversing biodiversity loss. The Government of Canada wants to recognize lands and waters managed in ways that achieve the conservation of biodiversity, but that are not protected areas or parks. OECMs are a

means of recognizing the conservation efforts of others. Conservation and biodiversity outcomes for OECMs are equal to those of a protected area. The main difference between the two is the primary purpose of the area. The primary objective of a protected area is conservation. On the other hand, an OECM is managed for another purpose while also achieving conservation and biodiversity outcomes. In order for an area to be recognized as an OECM, it must meet specific criteria, including: The area has defined boundaries—you can point to it on a map, governing authorities are able to control activities within the boundaries, governing authorities have the obligation to perform activities that lead to conservation in the area and restrict activities that are incompatible with conservation, conservation is year round and will be maintained in the long term, site goals will lead to conservation and biodiversity, conservation objectives are not threatened by other site objectives, governing authorities follow the management plan that is creating positive biodiversity outcomes, and no governing authorities threaten onsite conservation

Row 4

(8.17.1.1) Project reference

Select from:

☒ Project 4

(8.17.1.2) Project type

Select from:

☒ Forest ecosystem restoration

(8.17.1.3) Expected benefits of project

Select all that apply

☒ Net gain in biodiversity and ecosystem integrity

☒ Restoration of natural ecosystem(s)

(8.17.1.4) Is this project originating any carbon credits?

Select from:

☒ No

(8.17.1.5) Description of project

In Quebec and Ontario, there is increased degradation of forest landscapes caused by a long history of fire suppression and more than a decade of intense insect epidemic. The unprecedented size of forest fires in the past five years and the impacts of climate change have created the necessity to execute emergency fire

salvage operations above and beyond typical efforts. In these situations, we manage forests at 50/60% of our rate to support degraded forests and ensure they are properly regenerated.

(8.17.1.6) Where is the project taking place in relation to your value chain?

Select all that apply

☒ Project based in area with direct operations

(8.17.1.7) Start year

2024

(8.17.1.8) Target year

Select from:

☒ Indefinitely

(8.17.1.9) Project area to date (Hectares)

0

(8.17.1.10) Project area in the target year (Hectares)

0

(8.17.1.11) Country/Area

Select from:

☒ Canada

(8.17.1.12) Latitude

0

(8.17.1.13) Longitude

0

(8.17.1.14) Monitoring frequency

Select from:

☒ Six-monthly or more frequently

(8.17.1.15) Total investment over the project period (currency)

0

(8.17.1.16) For which of your expected benefits are you monitoring progress?

Select all that apply

☒ Net gain in biodiversity and ecosystem integrity

☒ Restoration of natural ecosystem(s)

(8.17.1.17) Please explain

This project is applicable to all of our managed forests in Quebec and Ontario and is implemented on an "as needed" basis. As fires or pest infestations occur we shift our harvesting operations to focus on salvage harvesting as a method for ensuring ecosystem restoration and integrity to support biodiversity. The specific areas where these activities are implemented are not tracked for reporting purposes.

[Add row]

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☒ Yes

(9.1.1) Provide details on these exclusions.

Row 1

(9.1.1.1) Exclusion

Select from:

☒ Business activities

(9.1.1.2) Description of exclusion

Water use in our manufacturing process is tracked, analyzed, and disclosed as part of this disclosure for the company's pulp, paper, and tissue operations, as well as our hydroelectric dams that power two of our mills (these facilities do not consume water - they use water to produce energy and generate electricity). Excluded are sawmills, paper converting centers, wood products facilities, head office, sales offices, and woodland operations, as well as human water consumption. Human water consumption is excluded from our corporate indicator count due to the small proportion of total water use it represents, i.e., less than 0.1%.

(9.1.1.3) Reason for exclusion

Select from:

☒ Other, please specify :The operations excluded represent an insignificant proportion of total water use.

(9.1.1.7) Percentage of water volume the exclusion represents

Select from:

☒ 1-5%

(9.1.1.8) Please explain

Human water consumption is excluded from our corporate indicator count due to the small proportion of total water use it represents, i.e., less than 0.1%. While our wood products facilities, including sawmills, measure, control, and work to improve their water management, their water use is insignificant when compared to our pulp, paper and tissue mills (approximately 450,000 cubic meters for all 22 wood products operations; less than 0.4% of our total water withdrawals) and are excluded from this disclosure. Water consumption at head and sales offices - primarily human water consumption - represents a minute fraction of the company's total consumption.

[Add row]

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Water withdrawal is tracked using a combination of flow meters, historical averages and calculations using the NCASI Water Consumption Tool.

(9.2.4) Please explain

Water withdrawal was calculated for 100% of the mills included in this disclosure. All mills are equipped with an on-site effluent treatment plant. As effluent regulation is based on water discharge volumes or flows, it is not required that all mills have a meter or flowmeter for water intake. Each mill reports effluent volume on a monthly basis using on-site flow meters. This data is entered into our internal data management systems and sent to the environmental managers at our head office. The data sheets from our management system are then used to calculate, manage and report company-wide environmental performance annually.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Water withdrawal is tracked using a combination of flow meters, historical averages and calculations using the NCASI Water Consumption Tool.

(9.2.4) Please explain

100% of our mills track water process withdrawals by source of water intake, usually one main source for the whole process. Around 94.4% of water withdrawn in 2024 was surface water.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☒ Not relevant

(9.2.4) Please explain

Incoming water quality is not monitored as the water is treated prior to entering into our production system in order to protect boilers, pipes and other equipment.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Water discharges are calculated using a combination of flow meters, historical averages, and NCASI Water Consumption Tools.

(9.2.4) Please explain

100% of our mills that treat their wastewater on-site monitor the effluent volume to comply with the regulations in the jurisdictions where they operate.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Water discharges are calculated using a combination of flow meters, historical averages, and NCASI Water Consumption Tools.

(9.2.4) Please explain

100% of our mills know the destination of their effluent and track the volumes released at discharge points.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Water discharges are calculated using a combination of flow meters, historical averages, and NCASI Water Consumption Tools.

(9.2.4) Please explain

100% of our mills know the destination of their effluent and were responsible for treating their effluent in 2024.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

All of Domtar's mills track effluent quality parameters in order to confirm compliance with permits and regulations. Other parameters are also tracked to monitor treatment efficiency and quality of water discharges.

(9.2.4) Please explain

99.9% of the water used in our pulp, paper, packaging operations and tissue making process passes through primary and secondary effluent treatment prior to being returned to the environment, with the exception of: 1) Jesup, GA; Hialeah, FL; Sanford, FL; and West Carrollton, OH; which send their wastewater (0.1% of total wastewater) to the municipality for treatment; and 2) Meadow Lake, SK which is a zero-effluent discharge mill so they don't have traditional primary/secondary treatment. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Other, please specify :Testing at multiple frequencies as specified in site-specific permits

(9.2.3) Method of measurement

All of Domtar's mills track effluent quality parameters in order to confirm compliance with permits and regulations.

(9.2.4) Please explain

Treatment plant performance is carefully tracked, using parameters such as biochemical oxygen demand (BOD5), total suspended solids (TSS), pH, phosphorus, temperature and other parameters at frequencies specified in individual site effluent discharge permits.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Temperature probes and thermometers.

(9.2.4) Please explain

100% of Domtar mills monitored effluent temperature in 2024.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Water consumption is measured directly on-site as well as indirectly using data and theoretical calculation tools, such as the NCASI Water Consumption Tool.

(9.2.4) Please explain

All of Domtar mills have effluent discharge flow meters. As effluent regulation is based on water discharge volumes or flows, it is not required that all mills have a calibrated flowmeter for water intake. Each mill reports effluent volume (and intake volume where measured) on a monthly basis using on-site flow meters. This data is entered into our internal data management systems and sent to the environmental coordinators at our head office. The data sheets from our management system are then used to calculate, manage and report company-wide environmental performance annually.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Continuously

(9.2.3) Method of measurement

Recycled water is calculated based on historical averages and calculations using the NCASI Water Consumption Tool, in combination with internal modeling of annual water consumption.

(9.2.4) Please explain

While a significant amount of water is required to make pulp, paper, packaging, and tissue, our operations return to the environment 94% of the water that is withdrawn, and we also reuse water to maximize efficiency. For instance, water is recycled to generate steam - the majority of our needs in terms of steam are self-generated.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

(9.2.2) Frequency of measurement

Select from:

☒ Daily

(9.2.3) Method of measurement

Standard operating procedures and checklists.

(9.2.4) Please explain

The health and safety of our employees is our number one priority, and as such, 100% of mills provide fully functioning WASH services for all workers directly on-site with proper control of water quality.

[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

509828.02

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Other, please specify :Progress on water reduction targets

(9.2.2.6) Please explain

In 2024, approximately 92.1% of water was returned to the environment, while the remaining 7.9% was either incorporated into the final product, lost through evaporation or incorporated into manufacturing residuals and byproducts. Domtar has established the following 2030 target: Reduce water use intensity by 20% over the 2020 baseline in the Paper and Packaging business unit.

Total discharges

(9.2.2.1) Volume (megaliters/year)

469324.19

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Other, please specify :Progress on water reduction targets

(9.2.2.6) Please explain

In 2024, approximately 92.1% of water was returned to the environment, while the remaining 7.9% was either incorporated into the final product, lost through evaporation or incorporated into manufacturing residuals and byproducts. Domtar has established the following 2030 target: Reduce water use intensity by 20% over the 2020 baseline in the Paper and Packaging business unit.

Total consumption

(9.2.2.1) Volume (megaliters/year)

40503.83

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☒ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☒ Other, please specify :Progress on water reduction targets

(9.2.2.6) Please explain

In 2024, approximately 92.1% of water was returned to the environment, while the remaining 7.9% was either incorporated into the final product, lost through evaporation or incorporated into manufacturing residuals and byproducts. Domtar has established the following 2030 target: Reduce water use intensity by 20% over the 2020 baseline in the Paper and Packaging business unit.

[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:

☒ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

102328.53

(9.2.4.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.4.5) Five-year forecast

Select from:

☒ Lower

(9.2.4.6) Primary reason for forecast

Select from:

☒ Increase/decrease in efficiency

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

20.07

(9.2.4.8) Identification tool

Select all that apply

☒ WRI Aqueduct

(9.2.4.9) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario. Domtar has established a 2030 target to reduce water use intensity in the Paper and Packaging business unit by 20% compared to a 2020 baseline. Since three of the four mills located in water-stressed regions are part of this unit, achieving this target is expected to drive reductions in water use intensity at these facilities by 2030.
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

480649.68

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.7.5) Please explain

The majority (94.4%) of our facilities intake water from surface water.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

Not relevant as we do not withdraw brackish surface water/ seawater.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

28153.1

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.7.5) Please explain

A small share of our facilities draw water from groundwater, including our Hawesville (Kentucky), Sanford (Florida), and West Carrollton (Ohio) facilities. Approximately 67% of our Sanford mill's total water intake is sourced from renewable groundwater.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

We do not use non-renewable groundwater.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☒ Not relevant

(9.2.7.5) Please explain

We do not use produced or entrained water.

Third party sources

(9.2.7.1) Relevance

Select from:

☒ Relevant

(9.2.7.2) Volume (megaliters/year)

305.39

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.7.5) Please explain

Only three facilities intake water from third-party sources for process use, including our Hialeah (Florida) tissue mill and our Jesup (Georgia) air laid facility. Approximately 33% of our Sanford (Florida) tissue mill's water intake is from third-party sources.

[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

381521.67

(9.2.8.3) Comparison with previous reporting year

Select from:

☒ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.8.5) Please explain

Approximately 92.1% of the water we withdraw is returned to the environment, into the rivers and lakes where we source the water we use. The remaining 7.9% is captured in the end product, captured in manufacturing residuals and byproducts or evaporated during the manufacturing process.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

87094

(9.2.8.3) Comparison with previous reporting year

Select from:

☒ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.8.5) Please explain

Treated effluent at several of our mills in western British Columbia discharge to the ocean.

Groundwater

(9.2.8.1) Relevance

Select from:

☒ Not relevant

(9.2.8.5) Please explain

We do not return treated effluent directly back to groundwater sources.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

399.07

(9.2.8.3) Comparison with previous reporting year

Select from:

☒ About the same

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.8.5) Please explain

Only four facilities discharge process effluent to third-party destinations, including our Hialeah (Florida) and Sanford (Florida) tissue mills, West Carrollton (Ohio) thermal coating mill and our Jesup (Georgia) air laid facility.

[Fixed row]

(9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

99.9% of the water we use in our pulp, paper and tissue making processes passes through primary and secondary effluent treatment.

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

469014.32

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Lower

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 100%

(9.2.9.6) Please explain

99.9% of the water used in our pulp, paper, packaging, and tissue making processes passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Treatment plant performance is carefully tracked, using parameters such as biochemical oxygen demand (BOD5). Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored, sampled and reported to regulatory authorities, in addition to being contained entirely in piping.

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

99.9% of the water we use in our pulp, paper and tissue making processes passes through primary and secondary effluent treatment.

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

99.9% of the water used in our pulp, paper, packaging, and tissue making processes passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Treatment plant performance is carefully tracked, using parameters such as biochemical oxygen demand (BOD5). Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored, sampled and reported to regulatory authorities, in addition to being contained entirely in piping.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

(9.2.9.2) Volume (megaliters/year)

399.07

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ About the same

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ Less than 1%

(9.2.9.6) Please explain

0.1% of the total wastewater (discharged from Jesup, Hialeah, Sanford, and West Carrollton) were sent to the nearby municipality for treatment. West Carrollton does primary treatment with a centrifuge before sending it to the municipality for final treatment.

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

(9.2.9.6) Please explain

99.9% of the water we use in our pulp, paper and tissue making processes passes through our own primary and secondary effluent treatment systems.
[Fixed row]

(9.2.10) Provide details of your organization's emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.

(9.2.10.1) Emissions to water in the reporting year (metric tons)

1587.11

(9.2.10.2) Categories of substances included

Select all that apply

☒ Nitrates

☒ Phosphates

(9.2.10.4) Please explain

Because wood naturally contains very low levels of nitrogen compounds, process waters from pulp and paper production also carry minimal nitrogen emissions. We do not report nitrates separately from total nitrogen (phosphate) as they are quantified together with other nitrogen (phosphorous) compounds; therefore, total nitrogen (and phosphorous) discharge is reported. Discharges from Paper and Packaging manufacturing operations: Total nitrogen: 745.47 metric tons. Total phosphorus: 151.73 metric tons. Discharges from Pulp and Tissue manufacturing operations Total nitrogen: 593.96 metric tons Total phosphorous: 95.95 metric tons. [Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:

☒ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

5

(9.3.3) % of facilities in direct operations that this represents

Select from:

☒ 1-25

(9.3.4) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☒ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

(9.3.4) Please explain

This is something that we plan on doing within the next 5 years.
[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:

☒ Facility 1

(9.3.1.2) Facility name (optional)

Nekoosa

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Wisconsin River

(9.3.1.8) Latitude

44.31493

(9.3.1.9) Longitude

-89.895575

(9.3.1.10) Located in area with water stress

Select from:

☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

43811.36

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

43811.36

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

41620.79

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

41620.79

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

2190.57

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher

(9.3.1.29) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario. Approximately 92.1% of the water we withdraw from pulp, paper, packaging and tissue mills is returned to the environment, into the rivers and lakes where we source the water we use. The remaining 7.9% is captured in the end product or evaporated during the manufacturing process. A small portion of our facilities (four facilities) discharge to third-parties. Domtar has two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments.

Row 2

(9.3.1.1) Facility reference number

Select from:

☒ Facility 2

(9.3.1.2) Facility name (optional)

Plymouth

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

United States of America

☒ Roanoke River

(9.3.1.8) Latitude

35.853481

(9.3.1.9) Longitude

-76.774312

(9.3.1.10) Located in area with water stress

Select from:

☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

43310.81

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

43310.81

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

41145.27

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ About the same

(9.3.1.23) Discharges to fresh surface water

41145.27

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

2165.54

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

(9.3.1.29) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario. Approximately 92.1% of the water we withdraw from pulp, paper, packaging and tissue mills is returned to the environment, into the rivers and lakes where we source the water we use. The remaining 7.9% is captured in the end product or evaporated during the manufacturing process. A small portion of our facilities (four facilities) discharge to third-parties. Domtar has two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments.

Row 3

(9.3.1.1) Facility reference number

Select from:

☒ Facility 3

(9.3.1.2) Facility name (optional)

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Wisconsin River

(9.3.1.8) Latitude

44.889636

(9.3.1.9) Longitude

-89.625775

(9.3.1.10) Located in area with water stress

Select from:

☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

14907.99

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

14907.99

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

14162.59

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

14162.59

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

745.4

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

(9.3.1.29) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk

is not projected to increase through 2050 under a business-as-usual scenario. Approximately 92.1% of the water we withdraw from pulp, paper, packaging and tissue mills is returned to the environment, into the rivers and lakes where we source the water we use. The remaining 7.9% is captured in the end product or evaporated during the manufacturing process. A small portion of our facilities (four facilities) discharge to third-parties. Domtar has two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments.

Row 4

(9.3.1.1) Facility reference number

Select from:

☒ Facility 4

(9.3.1.2) Facility name (optional)

Sanford

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :City of Sanford

(9.3.1.8) Latitude

28.803965

(9.3.1.9) Longitude

-81.30831

(9.3.1.10) Located in area with water stress

Select from:

☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

45.32

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Higher

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

30.21

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

15.11

(9.3.1.21) Total water discharges at this facility (megaliters)

42.6

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

(9.3.1.27) Total water consumption at this facility (megaliters)

2.72

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same**(9.3.1.29) Please explain**

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario. Approximately 92.1% of the water we withdraw from pulp, paper, packaging and tissue mills is returned to the environment, into the rivers and lakes where we source the water we use. The remaining 7.9% is captured in the end product or evaporated during the manufacturing process. A small portion of our facilities (four facilities) discharge to third-parties. Domtar has two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments.

Row 5**(9.3.1.1) Facility reference number**

Select from:

☒ Facility 5**(9.3.1.2) Facility name (optional)**

West Carrollton

(9.3.1.3) Value chain stage

Select from:

☒ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Risks

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

(9.3.1.7) Country/Area & River basin

Zimbabwe

☒ Other, please specify :Onsite groundwater wells in West Carrollton, Montgomery Country, Ohio

(9.3.1.8) Latitude

39.673325

(9.3.1.9) Longitude

-84.237743

(9.3.1.10) Located in area with water stress

Select from:

☒ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

253.05

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Lower

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

253.05

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

81.22

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

81.22

(9.3.1.27) Total water consumption at this facility (megaliters)

171.82

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

(9.3.1.29) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2025, our Nekoosa (Wisconsin), Rothschild (Wisconsin), and Sanford (Florida) mills are located in high-risk water stress areas, which are projected to remain high-risk through 2050 under a business-as-usual scenario. The Plymouth (North Carolina) and West Carrollton (Ohio) mills are located in medium-high risk areas. By 2050, risk is projected to increase to high risk for Plymouth (North Carolina) and remain medium-high risk for West Carrollton (Ohio) under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, and risk is not projected to increase through 2050 under a business-as-usual scenario. Approximately 92.1% of the water we withdraw from pulp, paper, packaging and tissue mills is returned to the environment, into the rivers and lakes where we source the water we use. The remaining 7.9% is captured in the end product or evaporated during the manufacturing process. A small portion of our facilities (four facilities) discharge to third-parties. Domtar has two 2030 water-related targets, which include

reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments.

[Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

At Domtar, we are committed to meeting and striving to exceed all applicable legal and regulatory requirements, as well as the company's environmental commitments. All of the water used in our pulp, paper, packaging and tissue making process passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments. Water withdrawal data from each site is internally reviewed, verified and consolidated by our business unit environmental teams.

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

At Domtar, we are committed to meeting and striving to exceed all applicable legal and regulatory requirements, as well as the company's environmental commitments. All of the water used in our pulp, paper, packaging and tissue making process passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments. Water withdrawal data from each site is internally reviewed, verified and consolidated by our business unit environmental teams.

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

At Domtar, we are committed to meeting and striving to exceed all applicable legal and regulatory requirements, as well as the company's environmental commitments. All of the water used in our pulp, paper, packaging and tissue making process passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments. Water withdrawal data from each site is internally reviewed, verified and consolidated by our business unit environmental teams.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

At Domtar, we are committed to meeting and striving to exceed all applicable legal and regulatory requirements, as well as the company's environmental commitments. All of the water used in our pulp, paper, packaging and tissue making process passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments. Water discharge data from each site is internally reviewed, verified and consolidated by our business unit environmental teams.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

At Domtar, we are committed to meeting and striving to exceed all applicable legal and regulatory requirements, as well as the company's environmental commitments. All of the water used in our pulp, paper, packaging and tissue making process passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments. Water discharge data from each site is internally reviewed, verified and consolidated by our business unit environmental teams.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

At Domtar, we are committed to meeting and striving to exceed all applicable legal and regulatory requirements, as well as the company's environmental commitments. All of the water used in our pulp, paper, packaging and tissue making process passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments. Water discharge data from each site is internally reviewed, verified and consolidated by our business unit environmental teams.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

At Domtar, we are committed to meeting and striving to exceed all applicable legal and regulatory requirements, as well as the company's environmental commitments. All of the water used in our pulp, paper, packaging and tissue making process passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments. Water discharge data from each site is internally reviewed, verified and consolidated by our business unit environmental teams.

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☒ Not verified

(9.3.2.3) Please explain

At Domtar, we are committed to meeting and striving to exceed all applicable legal and regulatory requirements, as well as the company's environmental commitments. All of the water used in our pulp, paper, packaging and tissue making process passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored and sampled, while effluent quality is reported to regulatory authorities. It is important to our stakeholders, including the people in the communities where we operate, as well as required by government regulations, that we use the necessary technologies to return good quality effluent to surface waters. We have two 2030 water-related targets, which include reducing our water use intensity by 20% over 2020 baseline in the Paper and Packaging business unit; and that 100% of our facilities have water-related risk mitigation plans in place within one year of completing risk assessments. Water discharge data from each site is internally reviewed, verified and consolidated by our business unit environmental teams.

[Fixed row]

(9.4) Could any of your facilities reported in 9.3.1 have an impact on a requesting CDP supply chain member?

Select from:

☒ This is confidential

(9.5) Provide a figure for your organization's total water withdrawal efficiency.

(9.5.1) Revenue (currency)

7640000000

(9.5.2) Total water withdrawal efficiency

14985.45

(9.5.3) Anticipated forward trend

Domtar has set a 2030 target to cut water use intensity in the Paper and Packaging unit by 20% from a 2020 baseline, driving lower consumption at these mills. A second 2030 target requires all facilities to adopt water risk mitigation plans within one year of assessments. Together, these efforts are expected to build resilience, reduce costs, and enhance efficiency through smarter water use.

[Fixed row]

(9.12) Provide any available water intensity values for your organization's products or services.

Row 1

(9.12.1) Product name

Company-wide water use intensity figure

(9.12.2) Water intensity value

4.54

(9.12.3) Numerator: Water aspect

Select from:

☒ Water consumed

(9.12.4) Denominator

Company-wide production in metric tons.

(9.12.5) Comment

The intensity value is our company-wide figure of water use/consumed in cubic meters over our production figure in metric tons.

Row 2

(9.12.1) Product name

Company-wide treated water effluent/discharge intensity figure

(9.12.2) Water intensity value

52.62

(9.12.3) Numerator: Water aspect

Select from:

☒ Other, please specify :water effluent/discharge

(9.12.4) Denominator

Company-wide production in metric tons.

(9.12.5) Comment

The intensity value is our company-wide figure of water effluent/discharge in cubic meters over our production figure in metric tons.

Row 3

(9.12.1) Product name

Company-wide water withdrawn/intake intensity figure

(9.12.2) Water intensity value

57.16

(9.12.3) Numerator: Water aspect

Select from:

☒ Water withdrawn

(9.12.4) Denominator

Company-wide production in metric tons.

(9.12.5) Comment

The intensity value is our company-wide figure of water withdrawn/intake in cubic meters over our production figure in metric tons.

[Add row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	Select from: <input checked="" type="checkbox"/> No	Domtar's pulp, paper, tissue, packaging, and wood products are not classified as hazardous by any regulatory authority.

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:

☒ Yes

(9.14.2) Definition used to classify low water impact

The World Resources Institute defines at least three types of water-related risks: physical, regulatory, and reputational. While we declare regulatory risks in section 4 of this disclosure, we consider the products we manufacture to be low risk. Physical: our products do not impact access or availability of water in our operating regions. Regulatory: the water rights agreements required to operate our hydroelectric facilities typically range from 10 to 25 years and, subject to certain conditions, are generally renewable for additional terms. We are not faced with, or expect to face, the suspension or withdrawal of our water permits, although there can be no certainty that we will be able to maintain the water rights necessary for our hydroelectric power generating facilities, or to renew such rights or power sales contracts on favorable conditions. Reputational: none at this time. For more information on our procedures for identifying and assessing water-related risks, see section 3.3 of this disclosure.

(9.14.4) Please explain

Water is not a critical ingredient in our final products, and while it is essential in the manufacturing process of pulp, paper and tissue, 92.1% of the water we withdraw is returned to the environment. The remaining 7.9% is captured in the end product, captured in manufacturing residuals and byproducts, or evaporated during the manufacturing process. All the water we use passes through our own primary and secondary effluent treatment systems prior to being returned to the environment, with the exception of cooling water that is entirely contained in piping and returned to the waterway. The availability of our key materials (wood and chemicals) is not significantly affected by quantity or quality of water. We do not rely on irrigated forests or plantations for our fiber needs. Severe prolonged droughts could impact wood availability, but the various risk assessment tools we use do not indicate this as a current or future risk of drought in the regions where we operate.
[Fixed row]

(9.15) Do you have any water-related targets?

Select from:

☒ Yes

(9.15.1) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

Water pollution

(9.15.1.1) Target set in this category

Select from:

☒ No, and we do not plan to within the next two years

(9.15.1.2) Please explain

Treatment plant performance is carefully tracked, using parameters such as biochemical oxygen demand (BOD5). Non-contact cooling water that does not mix with the process effluent may be returned without treatment, but it is monitored, sampled and reported to regulatory authorities.

Water withdrawals

(9.15.1.1) Target set in this category

Select from:

☒ Yes

Water, Sanitation, and Hygiene (WASH) services

(9.15.1.1) Target set in this category

Select from:

☒ No, and we do not plan to within the next two years

(9.15.1.2) Please explain

The health and safety of our employees is our number one priority, and as such, 100% of mills provide fully-functioning WASH services for all workers directly on-site with proper control of water quality.

Other

(9.15.1.1) Target set in this category

Select from:

☒ Yes

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:

☒ Target 1

(9.15.2.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water consumption

☒ Reduction per unit of production

(9.15.2.4) Date target was set

11/30/2022

(9.15.2.5) End date of base year

12/31/2020

(9.15.2.6) Base year figure

84.5

(9.15.2.7) End date of target year

12/31/2030

(9.15.2.8) Target year figure

67.6

(9.15.2.9) Reporting year figure

82.5

(9.15.2.10) Target status in reporting year

Select from:

☒ Underway

(9.15.2.11) % of target achieved relative to base year

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Other, please specify :United Nations Sustainable Development Goal 12

(9.15.2.13) Explain target coverage and identify any exclusions

This target is specifically for our Paper and Packaging business unit, target is set for 2030.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

We dedicated 2024 to further developing our water reduction target (previously established in 2022) for our paper and packaging business unit, which was then publicly launched in May 2025. Our current target is a 20% reduction in water intensity by 2030 from a 2020 baseline. Our plan for achieving the target includes: - Incorporating water conservation measures in asset conversions, greenfield projects and capital projects - Control water usage more efficiently via flow regulators - Adding mechanical seals with tank support systems to extend seal life - Rerouting water streams to a cooling tower for reuse, replacing single-pass freshwater systems - Replacing packing with mechanical seals to minimize freshwater losses - Reusing cooling water, process white water, and seal water instead of fresh water - Converting open-loop water cooling systems to closed-loop systems

(9.15.2.16) Further details of target

Domtar developed its current Sustainability Strategy between 2023 and 2025, culminating in a public announcement in May 2025. In 2024, the company defined objectives aligned with this strategy. Within our Environmental Stewardship pillar, we established a water resilience objective: strengthening the resiliency of our manufacturing operations by reducing water-related risks and impacts. In 2024, our goal was to develop measurable water resiliency targets, which we successfully achieved. The resulting 2030 commitments include: - Reducing water use intensity by 20% against a 2020 baseline in the Paper and Packaging business unit - Ensuring that 100% of facilities have water-related risk mitigation plans in place within one year of completing water risk assessments These commitments provide a clear pathway to enhance operational water resiliency while supporting long-term environmental performance. Through these measures, Domtar will progressively reduce freshwater intake, increase the reuse and recycling of process water, and ensure lasting alignment with our water stewardship objectives. The baseline year of 2020 for our first target will not change. The actual m3/salable metric ton baseline and goal numbers may change as we sell and buy mills or move them in and out of the business unit.

Row 2

(9.15.2.1) Target reference number

Select from:

☒ Target 2

(9.15.2.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Other

☒ Other, please specify :Ensure 100% of facilities have water-related risk mitigation plans

(9.15.2.4) Date target was set

12/30/2024

(9.15.2.5) End date of base year

11/18/2025

(9.15.2.6) Base year figure

0

(9.15.2.7) End date of target year

12/31/2030

(9.15.2.8) Target year figure

100

(9.15.2.9) Reporting year figure

0

(9.15.2.10) Target status in reporting year

Select from:

☒ New

(9.15.2.11) % of target achieved relative to base year

0

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☒ Other, please specify :United Nations Sustainable Development Goal 12

(9.15.2.13) Explain target coverage and identify any exclusions

By 2030, 100% of facilities have water-related risk mitigation plans in place within one year of completing risk assessments

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

In 2024, we focused on developing a new water risk assessment target, which was publicly launched in May 2025. By the end of the reporting year, we achieved our objective of establishing this target, with the long-term goal of achieving it by 2030. Our baseline year is 2025, from which progress will be measured. At this stage, our baseline progress is set at zero, as implementation begins to kick off in 2025. We are currently defining our water-related risk assessment methodology to ensure consistent measurement and reporting. Annual updates will be made to track improvements, and risk mitigation plans will be updated regularly as assessments are completed across facilities. Through this approach, we will strengthen our ability to reduce water-related risks and impacts, ensure continuous progress year over year, and remain on track to achieve our 2030 target.

(9.15.2.16) Further details of target

Domtar developed its current Sustainability Strategy between 2023 and 2025, culminating in a public announcement in May 2025. In 2024, the company defined objectives aligned with this strategy. Within our Environmental Stewardship pillar, we established a water resilience objective: strengthening the resiliency of our manufacturing operations by reducing water-related risks and impacts. In 2024, our goal was to develop measurable water resiliency targets, which we successfully achieved. The resulting 2030 commitments include: - Reducing water use intensity by 20% against a 2020 baseline in the Paper and Packaging business unit - Ensuring that 100% of facilities have water-related risk mitigation plans in place within one year of completing water risk assessments These commitments provide a clear pathway to enhance operational water resiliency while supporting long-term environmental performance. Through these measures, Domtar will progressively reduce freshwater intake, increase the reuse and recycling of process water, and ensure lasting alignment with our water stewardship objectives.

[Add row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☒ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☒ Law & policy

☒ Species management

☒ Education & awareness

☒ Land/water protection

☒ Land/water management

☒ Livelihood, economic & other incentives

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	<div>Select from:</div> <div><input checked="" type="checkbox"/> Yes, we use indicators</div>	<div>Select all that apply</div> <div><input checked="" type="checkbox"/> State and benefit indicators</div>

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
		<input checked="" type="checkbox"/> Pressure indicators <input checked="" type="checkbox"/> Response indicators

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Data not available

(11.4.2) Comment

Domtar sources wood from forest suppliers and landowners who manage forestland. The company focuses on responsible sourcing practices that help ensure legally protected and biodiversity are protected, by working with third-party-certified forest management systems, such as FSC and SFI, to ensure that the wood and fiber we use are harvested sustainably and in line with environmental standards. While we do perform risk assessments, we have not conducted a formal assessment to understand whether our manufacturing facilities are located in or near this type of area important for biodiversity. We plan to complete such an assessment within the next two years.

UNESCO World Heritage sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Data not available

(11.4.2) Comment

While we do perform risk assessments, we have not conducted an assessment to understand whether our manufacturing facilities are located in or near this type of area important for biodiversity. We plan to complete such an assessment within the next two years. We do assess for high conservation values both in our production areas, as well as assess for risk across all of our fiber sourcing to ensure we are not sourcing from areas of high conservation value.

UNESCO Man and the Biosphere Reserves

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Data not available

(11.4.2) Comment

While we do perform risk assessments, we have not conducted an assessment to understand whether our manufacturing facilities are located in or near this type of area important for biodiversity. We plan to complete such an assessment within the next two years. We do assess for high conservation values both in our production areas, as well as assess for risk across all of our fiber sourcing to ensure we are not sourcing from areas of high conservation value.

Ramsar sites

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Data not available

(11.4.2) Comment

While we do perform risk assessments, we have not conducted an assessment to understand whether our manufacturing facilities are located in or near this type of area important for biodiversity. We plan to complete such an assessment within the next two years. We do assess for high conservation values both in our production areas, as well as assess for risk across all of our fiber sourcing to ensure we are not sourcing from areas of high conservation value.

Key Biodiversity Areas

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Data not available

(11.4.2) Comment

While we do perform risk assessments, we have not conducted an assessment to understand whether our manufacturing facilities are located in or near this type of area important for biodiversity. We plan to complete such an assessment within the next two years. We do assess for high conservation values both in our production areas, as well as assess for risk across all of our fiber sourcing to ensure we are not sourcing from areas of high conservation value.

Other areas important for biodiversity

(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Data not available

(11.4.2) Comment

While we do perform risk assessments, we have not conducted an assessment to understand whether our manufacturing facilities are located in or near this type of area important for biodiversity. We plan to complete such an assessment within the next two years. We do assess for high conservation values both in our production areas, as well as assess for risk across all of our fiber sourcing to ensure we are not sourcing from areas of high conservation value.

[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

(13.1.1) Other environmental information included in your CDP response is verified and/or assured by a third party

Select from:

☒ No, but we plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years

(13.1.2) Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party

Select from:

☒ Not an immediate strategic priority

(13.1.3) Explain why other environmental information included in your CDP response is not verified and/or assured by a third party

Domtar's near-term focus is integrating our environmental, energy, greenhouse gas and other sustainability datasets in addition to implementing a group-wide ESG data management system. As part of this initiative, we are enhancing the process controls related to our sustainability reporting in partnership with internal subject matter experts and our Internal Audit team. Once these priorities are addressed, we will evaluate the logistics and value of third-party verifying additional environmental data beyond our Scope 1 & 2 greenhouse gas emissions.

[Fixed row]

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

	Additional information	Attachment (optional)
	2024 Sustainability Report	Domtar_SGR2025_ENG_V10.pdf

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Global Chief Sustainability Officer

(13.3.2) Corresponding job category

Select from:

☒ Chief Sustainability Officer (CSO)

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:

☒ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute

