

The logo for Domtar, featuring the word "Domtar" in a white serif font. The letter 'a' is stylized with a small green leaf-like shape on its right side. The logo is centered on a dark blue background that has a large, abstract, leaf-like shape cut out of it, revealing a lighter blue background behind.

Domtar

Domtar Corporation 2025 Report

To the Canadian Minister of Public Safety and Emergency Preparedness
Fighting Against Forced Labour and Child Labour in Supply Chains Act

May 31, 2026



Table of Contents

About Domtar 2

Domtar’s Commitment to Reduce the Risk of Forced Labour and Child Labour..... 3

Domtar’s Structure, Activities, Governance and Supply Chains 3

Domtar’s Leadership 4

Domtar’s Supply Chain 4

Policies and Due Diligence Processes..... 5

Risk Management..... 6

2025 Supply-Chain Risk Assessment of Slavery, Child and Forced Labour, and Exposure to Human Trafficking 7

Forced labour and Child Labour Risks..... 8

Remediation Measures 8

Remediation of Loss of Income 9

Training 9

Assessing Effectiveness 9

Approval..... 10

Attestation..... 11

Appendix: List of Domtar’s Subsidiaries 12

About Domtar

Domtar is a leading, privately held manufacturer of diversified forest products and designs, manufactures, markets and distributes a wide variety of fibre-based products, including paper, packaging, market pulp, wood products and tissue, which are marketed in more than 90 countries. Domtar’s annual production capacities are 5.97 million metric tons of pulp, paper, packaging and tissue and approximately 2.6 billion board feet of lumber and other wood products. The company is the largest integrated manufacturer and marketer of uncoated freesheet paper and uncoated mechanical papers in North America, as well as a leading global producer of newsprint, fluff, recycled and softwood pulp in North America.

Domtar Corporation has more than 12,000 employees in Canada and the United States. It owns or operates, through its subsidiaries, manufacturing facilities, including pulp and paper mills, tissue facilities and sawmills, as well as power generation assets. These operations are supported by a supply chain that includes the sourcing of raw materials, manufactured inputs, equipment, and services necessary for fibre procurement, manufacturing, converting and distribution. Certain goods and services are sourced from third-party suppliers, including both domestic and international vendors.

Reporting entity’s legal name	Domtar Corporation
Financial reporting year	January 1, 2025, to December 31, 2025
Identification of a revised report	None
Identification of a joint report	This report jointly covers Domtar Corporation’s primary operating subsidiaries in Canada: Domtar Inc., Resolute FP Canada Inc., Fibrek General Partnership, Resolute Engineered Wood Larouche Inc., and Resolute Engineered Wood St-Prime LP (collectively referred to as “Domtar”)
Entity categorization according to the Act	Has a place of business in Canada, does business in Canada or has assets in Canada and, on the basis of its consolidated financial statements, meets at least two of the following conditions for at least one of its two most recent financial years: <ul style="list-style-type: none"> a) It has at least \$20 million in assets; b) It has generated at least \$40 million in revenue; c) It employs an average of at least 250 employees.
Sector/Industry	Pulp, paper, tissue, packaging and wood products manufacturing in Canada and the United States (U.S.)
Location	Domtar Corporation is incorporated in Delaware, with a head office in Fort Mill, South Carolina, and numerous manufacturing facilities operated by its subsidiaries and affiliates across the United States and Canada

Domtar's Commitment to Reduce the Risk of Forced Labour and Child Labour

This report describes the steps Domtar took this year to help prevent and reduce the risk that forced labour or child labour occurs in its operations and supply chains, including:

1. Maintaining governance and oversight for compliance with the Act through a cross-functional task force
2. Implementing and reviewing policies and due diligence controls that set expectations for employees and suppliers regarding forced labour and child labour
3. Identifying and assessing potential forced labour and child labour risks in the supply chain, including screening and due diligence activities
4. Strengthening procurement practices and contractual requirements to support responsible sourcing
5. Requiring Code of Ethics and Business Conduct training for all employees
6. Maintaining mechanisms to raise concerns and support remediation where required
7. Monitoring and assessing the effectiveness of these measures to drive continuous improvement

Domtar's Structure, Activities, Governance and Supply Chains

Domtar is a Delaware corporation with its head office in Fort Mill, South Carolina, United States, as well as corporate offices in Montreal, Quebec and Richmond, British Columbia, Canada. It is a voluntary filer with the Securities and Exchange Commission in the United States. Its most recent Form [10-K annual report](#) is available on the SEC website.

Domtar operates with three business units; Paper & Packaging, Pulp & Tissue and Wood Products. Domtar's 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, and baled market pulp. The company also operates Domtar POS, specializing in converting thermal paper rolls into point-of-sale (POS) receipt rolls used across various industries, including food service, retail, pharmacy, and financial services. The business operates four facilities located in Arizona, Kansas, Tennessee and Virginia.

Domtar's 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.

Domtar's Wood Products business unit operates 21 wood products facilities, including 15 sawmills that produce dimensional spruce-pine-fir lumber. These sawmills are a major source of wood chips in both Canada and the U.S., as well as dimensional 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, one wood pellet facility and a planer mill that, together, produce 82 million board feet of remanufactured wood products, 120 million linear feet of engineered wood and 45,000 metric tons of wood pellets.

Domtar's Leadership

Domtar's Executive Committee (ExCo) consists of its most senior executive leaders and holds collective accountability for leading the company by formulating and executing strategy, driving performance, and ensuring alignment across the enterprise. Each member retains individual accountability for performance within their respective areas of responsibility. ExCo members are:

- **Claudio Cotrim**, Chief Corporate Officer
- **Steve Henry**, Paper & Packaging CEO and President, USA
- **Hoany Muljadi**, Deputy Chair of Advisory Board and interim Tissue CEO
- **Joe Ragan**, Chief Financial Officer
- **Sebastien Richard**, Interim Chief Human Resources Officer
- **Luc Thériault**, Pulp & Wood Products CEO and President, Canada

Domtar's Supply Chain

Fibre: Domtar's sources of wood include local producers, sawmills that supply residual wood chips, government-owned land where the company holds timber supply guarantees or harvesting rights, and property that it owns or leases. In the United States, the company uses mainly wood fibre (softwood and hardwood) as well as old corrugated containers. In Canada, it uses hardwood and softwood, including a significant amount of residual chips from its sawmills. Domtar holds licenses from government authorities in Ontario and Quebec to harvest fibre from public lands in those provinces.

Chemicals: Domtar purchases various chemical compounds for its manufacturing operations under contracts with terms of one to 10 years to ensure product availability. For pulp manufacturing, the company uses chemicals such as caustic soda, sodium chlorate, sulphuric acid, hydrogen peroxide and lime. For paper manufacturing, it uses starch, precipitated calcium carbonate, clay, optical brighteners, dyes and aluminum sulfate. Many of these products are sourced in North America from North American suppliers and involve international supply chains.

Energy: Domtar’s operations produce and consume substantial amounts of energy, mainly from biomass, natural gas and electricity, including hydroelectric power. Most of its energy comes from renewable sources, such as bark and by-products from its manufacturing process, including spent pulping liquor and hydroelectricity. The remainder comes from natural gas, electricity, other fossil fuels and steam purchased under supply contracts. The company has cogenerating assets at a number of its integrated pulp and paper mills. These assets generate renewable energy, primarily from biomass.

Policies and Due Diligence Processes

Domtar has adopted policies on ethics, business conduct and fundamental human rights, including its [*Code of Ethics and Business Conduct*](#), [*Whistleblower Complaints Policy and Procedures*](#), [*California Transparency in Supply Chains Act Disclosure*](#), and [*Human Rights Policy*](#). The company’s corporate governance framework provides oversight of these policies, including regular reviews. As part of its compliance program, employees receive annual online training on the *Code of Ethics and Business Conduct*. Together, these policies and controls form part of Domtar’s broader compliance program, which guides its actions and supports compliance with applicable laws and regulations in the jurisdictions where it operates.

Domtar expects its suppliers to operate responsibly and in compliance with applicable laws and regulations, including meeting requirements related to forced labour and child labour under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and, where relevant, comparable requirements in other jurisdictions. Domtar communicates these expectations through its supplier onboarding and purchasing processes, as well as contractual provisions incorporated into supplier agreements.

In particular suppliers are expected to comply with requirements to:

- Not use forced labour or any other form of compulsory labour, including human trafficking or slavery, and ensure that goods supplied to Domtar are not produced using such practices
- Not use child labour, ensure that workers meet the applicable legal minimum working age, and ensure that workers under the age of 18 do not perform hazardous work that could endanger their health or safety
- Applicable minimum wage, overtime and maximum hour laws, as well as other wage and hour requirements
- Respect workers’ lawful rights to freely choose whether to join, or not join, any legally sanctioned organization or association

Domtar monitors adherence to these expectations through ongoing, risk-based supplier due diligence. This may include supplier self-assessments, requests for supporting

documentation, and, where appropriate, independent third-party audits or other verification activities. Where potential non-compliance related to forced labour or child labour is identified, Domtar expects suppliers to take timely corrective action and to cooperate with Domtar in addressing the issue, consistent with contractual requirements.

Risk Management

In May 2025, Domtar released a Sustainability Strategy to guide its objectives through 2030. The Strategy is built on three pillars aligned with Domtar's Sustainability Policy: Environmental Stewardship (reducing Domtar's environmental footprint and supporting positive outcomes for nature), Our People and Communities (supporting employee wellbeing and contributing to the prosperity of operating communities), and Responsible Business (upholding ethical, transparent business practices).

Within the Responsible Business pillar, Domtar set an objective to safeguard people connected to its operations and value chain by respecting human rights and labour standards, supporting safe working conditions, and prohibiting abuse of any kind, including child labour and forced labour. Domtar's targets are to develop a global human rights policy aligned with international standards by 2026 and to conduct comprehensive human rights risk assessments across the value chain by 2030, implementing measures to mitigate identified risks.

The oversight and identification of forced labour and child labour risks is supported by Domtar's established governance and control frameworks. The ExCo holds ultimate accountability for the oversight of these risks. Additionally, the ExCo delegates its oversight to the Global Sustainability Steering Committee, an executive-level governance body with representation from both ExCo members and other Domtar senior leaders. Management-level responsibility for these risks is held with Domtar's Sustainability Committee, a cross-functional committee composed of senior managers and subject matter experts from across the organization. As part of its sustainability governance and risk-informed decision-making, Domtar completed a double materiality assessment in 2025. The company identified key sustainability-related impacts, risks and opportunities across its value chain through the lens of both impact materiality (how Domtar affects people and the environment) and financial materiality (how sustainability matters affect Domtar). This process supported the assessment of a wide range of environmental, social and governance topics and helped confirm Domtar's material sustainability topics.

While social topics such as worker safety and community impact were identified as material, human rights did not emerge as a significant risk area. Domtar's existing policies, governance frameworks and responsible business practices help mitigate human rights-related risks, reaffirming alignment with ethical and regulatory standards.

2025 Supply-Chain Risk Assessment of Slavery, Child and Forced Labour, and Exposure to Human Trafficking

In 2025, Domtar undertook a targeted supply-chain risk assessment focused on its global enzyme suppliers, building on assessments conducted in the prior year that focused on chemical and industrial fabric suppliers. The 2025 assessment did not identify any findings related to forced labour or child labour. Enzyme suppliers, along with chemical and industrial fabric suppliers previously assessed, continue to be subject to Domtar's ongoing, risk-based supplier screening and monitoring processes. Energy and fibre suppliers were excluded from these assessments due to their sourcing profile and existing controls. Domtar's energy supply is sourced locally from low-risk regions in Canada and the United States, while 100% of Domtar's fibre supply is sourced in accordance with one or more of the following third-party certification requirements: the Sustainable Forestry Initiative's fibre-sourcing requirements; the Programme for the Endorsement of Forest Certification's chain-of-custody (CoC) due-diligence requirements; and the Forest Stewardship Council's Controlled Wood Standard. Domtar is the world's largest holder of Forest Stewardship Council® and Sustainable Forestry Initiative® Forest Management certificates, and 100% of the woodlands it manages are certified by independent third parties according to at least one of these internationally recognized standards. Furthermore, all of Domtar's mills and wood product facilities have CoC systems that are third-party certified according to one or more of the following internationally recognized CoC standards:

- Sustainable Forestry Initiative® (SFI®);
- Programme for the Endorsement of Forest Certification (PEFC);
- Forest Stewardship Council® (FSC®).

Forest management and CoC standards require rigorous due-diligence processes, including labour-related requirements, which Domtar considers to be a strong mitigating control for forced labour and child labour risks within its fibre supply.

Domtar monitors over 10,000 suppliers and applies a continuous, ongoing and risk-based vetting process supported by screening tools, including the Descartes Screening platform. Suppliers may be screened when they are onboarded and when updates occur, with ongoing monitoring supported by automated alerts when potential risk indicators are identified. These alerts are reviewed by responsible personnel to assess their relevance and determine whether any follow-up action is required, ensuring consistent and proactive oversight of supplier risk. Descartes Screening automates screening of suppliers and other business partners against global sanctions and restricted-party lists, uses configurable risk scoring and approximate name-matching to identify potential matches, and maintains an auditable record of screening results and follow-up decisions. Descartes Screening is updated continuously as lists change and can rescreen existing suppliers when new restrictions are issued.

The company's screening methodology combines (i) supplier location and country/region risk indicators, (ii) sector and product-category considerations (including chemicals and industrial fabrics), and (iii) screening results returned by Descartes Screening (e.g., sanctions-related flags and other restricted-party indicators). Potential matches are routed through an internal case review process to distinguish false positives from elevated-risk findings and to document decisions. Where screening results and risk indicators meet internal escalation thresholds, Domtar may initiate additional due diligence actions, such as issuing a supplier due diligence questionnaire focused on forced labour and child labour, requesting supporting documentation, developing a corrective action plan with time-bound actions, or engaging an independent third-party audit where appropriate.

In addition to the risk assessment and due diligence described above, Domtar continues to strengthen its procurement processes to reinforce expectations related to forced labour and child labour. This includes updating procurement policy and supplier contracting and purchase-order terms and conditions to require suppliers to comply with applicable forced- and child-labour legislation, including the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. Domtar also intends to continue using Descartes Screening to support ongoing supplier screening and rescreening and, where warranted, to trigger additional supplier due diligence activities.

Forced Labour and Child Labour Risks

Domtar assesses and manages potential forced labour and child labour risks in its supply chain using a risk-based due diligence approach that combines supplier screening, targeted follow-up and ongoing monitoring. In 2025, Domtar's activities did not identify any material forced labour or child labour concerns within its supply chain.

Remediation Measures

Domtar's *Code of Ethics and Business Conduct*, together with its *Whistleblower Complaints Policy* and hotline, provides a channel for employees and suppliers to report ethical, legal or other concerns. Domtar reports no material findings of forced labour or child labour in 2025; accordingly, no remediation actions were required during the year. Consistent with the intent of the Act and evolving guidance, Domtar looks to strengthen its readiness to respond if concerns are identified, including by considering a range of potential remedies and the factors relevant to whether and how Domtar would responsibly disengage from a supplier.

Remediation of Loss of Income

In 2025, Domtar's risk assessment and due diligence activities identified no material forced labour or child labour risks in its supply chain; therefore, no actions were required to remediate loss of income arising from such risks.

Training

In March 2024, Domtar held a mandatory training session on modern slavery for 50 procurement leaders, delivered in English and French. The training covered the risks of forced labour and child labour and relevant warning signs for the forest products sector, as well as key reporting standards and laws, including Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and similar requirements in other jurisdictions.

Additionally, between 2023 and 2024, Domtar provided sustainability training to approximately 280 executives, directors and managers. This training included an overview of sustainability best practices related to risk management, governance and reporting on high-impact material issues, including modern slavery and human rights.

The recorded 2024 training session remains available to all employees. Domtar continues to consider how training may be incorporated or enhanced over time as its approach to this disclosure and human rights risk management continues to mature. Domtar also expects to continue improving the tools and information provided to suppliers through its procurement processes to help reinforce these expectations.

Assessing Effectiveness

Domtar assesses the effectiveness of its forced labour and child-labour due diligence by monitoring key measures and using results from this process to inform continuous improvement in procurement controls, supplier oversight and training. Examples of measures Domtar may track include:

- Supplier screening process, including coverage and results
- Enhanced due diligence activity including questionnaires and document reviews
- Corrective action plans initiated and the time taken to close actions
- Contractual controls, including supplier contracts or purchase terms that cover forced- and child-labour requirements
- Grievance and reporting mechanisms, such as ethics or whistleblower channels
- Year-over-year trends that indicate reduced exposure to higher-risk suppliers or categories

Over time, Domtar expects to continue strengthening its effectiveness assessment by improving data consistency across these measures and considering periodic independent reviews to enhance credibility and support continuous improvement.

Approval

This report was approved by Domtar's Executive Committee at the time of its signature.

Attestation

In accordance with the requirements of the Act, in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Domtar. On the basis of my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Name: Claudio Cotrim

Title: Chief Corporate Officer and member of the Executive Committee

Date: May 18, 2026

Signature: 

I have the authority to bind Domtar Corporation.

Appendix: List of Domtar's Subsidiaries

Domtar Industries LLC
Domtar Funding Limited Liability Company
E.B. Eddy Paper, Inc.
Ariva Distribution Inc.
Domtar A.W. LLC
Domtar Wisconsin Dam Corp.
Domtar Europe Sprl
Domtar AI Inc.
EAM Corporation
Palmetto Enterprises LLC
Domtar Paper Company, LLC
Domtar Delaware Holdings, LLC
West Carrollton Paper LLC
Domtar Delaware Holdings Inc.
Domtar Luxembourg Investments Sarl
Domtar Inc.
13536637 Canada Inc.
Domtar Pulp and Paper General Partnership
Domtar Asia Limited
Domtar Hong Kong Limited
468327 B.C. Ltd.
0606890 B.C. Ltd.
British Columbia Forest Products Limited
Catalyst Pulp and Paper Sales Inc.
Crofton Pulp and Paper Limited
Echelon Paper Corporation
Elk Falls Pulp and Paper Limited
Export Sales Co. Ltd.
NSC Holdings (Philippines) Inc.
Pacifica Poplars Ltd.
Catalyst Pulp Sales Inc.
Catalyst Paper General Partnership
Catalyst Paper Holdings Inc.
Catalyst Paper (Snowflake) Inc.
Catalyst Paper (USA) Inc.
Pacifica Papers U.S. Inc.
Pacifica Poplars Inc.
Pacifica Papers Sales Inc.
Domtar Renaissance LLC
New Receiptco Opco LLC
Iconex Holdco Inc.
Iconex Minority Shareholder LLC
Interactive Printing Solutions Mexico I, S.A. de C.V.
Resolute Forest Products Inc.
Donohue Corp.
Resolute US Lumber Inc.
Resolute El Dorado Inc.
Resolute Navcor LLC
Resolute Cross City LLC
Resolute Cross City Timber Management LLC
Resolute Caddo River LLC
Resolute Cross City Real Estate Holdings LLC
Resolute Glenwood LLC

FibreK U.S. Inc.
FibreK Recycling U.S. Inc.
GLPC Residual Management, LLC
AbiBow Recycling LLC
Abitibi Consolidated Sales LLC
Resolute FP Augusta LLC

Resolute Growth US LLC
Resolute FP Florida Inc.
Atlas Tissue Holdings, Inc.
Atlas Paper Mills, LLC
Atlas Paper Management, LLC
Accurate Paper Holdings, LLC
Atlas Southeast Papers, Inc.
Resolute Tissue LLC
Bowater Newsprint South LLC
Resolute FP US Inc.
Bowater Nuway Mid-States Inc.
Resolute FP Sub 1 Inc.
Lake Superior Forest Products Inc.
Calhoun Newsprint Company
Calhoun Note Holdings AT LLC
Calhoun Note Holdings TI LLC
Resolute Hagerstown LLC
Resolute Engineered Wood Sales LLC
Bowater South American Holdings Incorporated
Bowater Canadian Holdings Incorporated
Bowater Canadian Limited
AbitibiBowater Canada Inc.
Resolute FP Canada Inc.
Resolute Engineered Wood Larouche Inc.
Resolute Engineered Wood St-Prime Limited Partnership
9192-8515 Quebec Inc.
Forest Products Mauricie LP
9340939 Canada Inc.
SFK Pulp Finco Inc.
FibreK General Partnership
FibreK International Inc.
15477468 Canada Inc.
Profor Renaissance LP
Profor Renaissance, LLC
9546-6215 Quebec Inc.
95466215 General Partnership

Affiliated Companies (minority interest)

Celluforce Inc.
Northshore Forest Inc.
Vermilion Forest Management Co.
Prisma Renewable Composites, Inc.
3436900 Canada Inc.
Société en Commandite Scierie Opitciwan
Tradepak Internacional S.A. de C.V.
Boundary Waters Forest Management Corp
Performance BioFilaments Inc.