



Domtar Corporation

CDP Corporate Questionnaire 2026

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(13.3) Provide the following information for the person that has signed off (approved) your CDP response. 454

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub to facilitate collective action in priority basins. 454

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 over 13,000 employees in approximately 60 locations across North America. The company has an annual capacity of 6.8 million metric tons of pulp, paper, packaging and tissue annually, and has an annual production capacity of about 2.6 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 Paper and 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. Domtar POS, acquired by Domtar in November 2024, specializes in converting thermal paper parent rolls into receipt rolls for industries such as food services, retail, pharmacy and financial services. It operates from four sites in Arizona, Kansas, Tennessee and Virginia. Our Pulp business unit operates 12 facilities, including six pulp mills that produce softwood, recycled bleached kraft and fluff pulp. It also manufactures newsprint and specialty uncoated mechanical papers. Our Wood Products business unit operates 20 wood products facilities, including 15 sawmills that produce dimensional lumber and decking. These sawmills are a major source of wood chips in both Canada and the U.S., and 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. Our Tissue business unit operates three facilities that produce a range of bath tissue, towel and facial tissue products for the at-home and commercial markets, spanning ultra, premium and value grades. Domtar also manages directly or indirectly 22 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. Most of our manufacturing facilities and woodlands operations – 86% – are ISO 14001 certified, and all facilities operate under environmental management systems aligned to the standard, supported by site-specific targets, risk mitigation plans and action plans. 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. In addition, our 2030 strategy aligns with the United Nations Sustainable Development Goals (SDGs), specifically Goals 3, 5, 8, 9, 11, 12, 13, 15 and 16, reinforcing our commitment to addressing global environmental and social challenges.

(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

12/31/2025

(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

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

7381000000

(1.5) Provide details on your reporting boundary.

(1.5.1) Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?

Select from:

☒ No

(1.5.2) How does your reporting boundary differ to that used in your financial statement?

The environmental and social data included in our CDP disclosure differ slightly in scope from the consolidated information in Domtar Corporation's annual report on the Security and Exchange Commission's Form 10-K. The operations included in this disclosure encompass those of Domtar Corporation as well as Paper Excellence Canada Investments Corporation and their respective subsidiaries.

[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: ☒ Yes, for all facilities	N/A

(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

Row 69

(1.8.1.1) Identifier

Kingsport Mill

(1.8.1.2) Latitude

36.549733

(1.8.1.3) Longitude

-82.566361

(1.8.1.4) Comment

Paper Manufacturing

[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 (including own land)

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:

☒ Both direct operations and upstream/downstream value chain

Consumption

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

Select from:

☒ Yes

[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)

15435259

(1.22.8) Of the total commodity volume, state how much is post-consumer recycled content (metric tons)

1224308

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

Select from:

☒ No

(1.22.12) Form of commodity

Select all that apply

☒ Hardwood logs

☒ Paper

☒ Pulp

☒ Sawn timber, veneer, chips

☒ Softwood logs

(1.22.13) % of procurement spend

Select from:

☒ 81-90%

(1.22.14) % of revenue dependent on commodity

Select from:

☒ 100%

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

Select from:

☒ Yes, disclosing

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

Select from:

☒ Yes

(1.22.20) 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 2025 was 12,607,269 tons. 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. We also purchased 1,776,000 tons of boiler fuel, this volume is not included in our disclosure.
[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

Farmed seafood / 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

Wild-capture seafood

(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 56% of our supply, we have direct visibility to the production unit. For 43% 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 1% 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?

(1.24.1.1) Plastics mapping

Select from:

☒ No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☒ Other, please specify :Domtar's exposure to plastics is considered low risk. Most products are made from renewable, biodegradable wood fiber, including recyclable alternatives to plastic packaging.

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

The use of and exposure to plastics in Domtar's value chain is deemed 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.

[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 addresses climate, biodiversity, forest, and water-related dependencies, impacts, risks, and opportunities linked to transitional and physical risks affecting our operations, supply chains, and compliance costs. Key dependencies include water availability for mill operations, hydroelectric power generation, and consistent fiber supply from managed forests. Our annual risk management process, coordinated by our Business Unit Environment leads, Sustainability and Internal Audit teams, identifies material items and mitigation actions that are incorporated into annual strategic and financial planning. Our Double Materiality Assessment (DMA) completed in 2025 ensures both financial and broader environmental impacts are systematically considered, with items evaluated by likelihood and magnitude including operating costs, capital expenditure, and revenue implications. Short-term opportunities include efficiency gains from energy projects and cost savings from renewable energy sourcing. Findings directly inform the annual audit plan, capital allocation, and operational resilience measures, while also considering upstream value chain factors including supplier due diligence and fiber certification compliance.

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 while supporting our operating communities and broader environmental and social benefits. This timeframe addresses environmental dependencies such as ecosystem services supporting forest regeneration, watershed health, and long-term productivity of managed forests. Our public targets guide continuous improvement, including measurable GHG emission reductions. These are embedded into operational strategic plans and linked to GHG reduction projects such as energy efficiency upgrades, fuel-switching, and renewable energy sourcing. These projects are evaluated for capital allocation decisions, with anticipated policy developments like carbon pricing factored into financial forecasts. Medium-term opportunities include enhanced market access through FSC, SFI and PEFC certifications, EUDR compliance, and meeting customer demand for lower-carbon, sustainably sourced products. Our annual risk management process and Double Materiality Assessment (DMA) incorporate medium-term dependencies, impacts, risks, and opportunities with mitigation plans tracked against this horizon. We assess interconnections between environmental issues, recognizing that climate impacts on water availability can affect forest health and fiber supply.

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 prioritizing value creation across all three Business Units, disciplined capital allocation, and product innovation while transitioning from mature markets to long-term growth markets. Our long-term planning addresses critical environmental dependencies, including climate-stable fiber supply regions, forest productivity, and water availability. Both transitional and physical risks are assessed to support business resilience. Our capital allocation strategy integrates climate and nature-related considerations for major investments, informed by our Double Materiality Assessment (DMA) evaluating financial impacts, risks, and opportunities. Long-term opportunities include growth in sustainable packaging markets, competitive positioning from decarbonization leadership, carbon sequestration benefits from managed forests, and sustainability-linked financing. Strategic planning includes expanding into

growth markets, modernizing assets, and aligning with climate commitments beyond 2030. Consistent with our 5-10 year corporate long-term horizon, we assess how environmental dependencies affect business resilience. Climate change can influence water availability, forest health, biodiversity, and fiber supply security. Our corporate planning horizon is 5-10 years; however, forest management planning extends 20-25 years to account for forest growth cycles and support sustainable fiber supply and productivity.

[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: ☒ Yes	Select from: ☒ 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: ☒ Yes	Select from: ☒ Both risks and opportunities	Select from: ☒ 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

☒ Site-specific

☒ Local

☒ Sub-national

(2.2.2.12) Tools and methods used

Enterprise Risk Management

- ☒ Enterprise Risk Management
- ☒ Stress tests
- ☒ Other enterprise risk management, please specify :Impact Assessment, Double Materiality Assessment, Partner and stakeholder consultation/analysis, scenario analysis

International methodologies and standards

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

Databases

- ☒ Nation-specific databases, tools, or standards, please specify

Other

- ☒ Scenario analysis
- ☒ Desk-based research
- ☒ External consultants
- ☒ Materiality assessment
- ☒ Internal company methods
- ☒ Partner and stakeholder consultation/analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

- ☒ Drought
- ☒ Flood (coastal, fluvial, pluvial, ground water)
- ☒ Heavy precipitation (rain, hail, snow/ice)
- ☒ Invasive species
- ☒ Wildfires

Chronic physical

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

- ☒ Increased severity of extreme weather events

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

- ☒ Changing customer behavior
- ☒ Lack of availability and/or increased cost of certified sustainable material

Reputation

- ☒ Increased concern and/or negative feedback from partners and stakeholders
- ☒ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g., GHG emissions, deforestation & conversion, water stress, excessive bycatch)

Technology

- ☒ Unsuccessful investment in new technologies

Liability

- ☒ Exposure to sanctions and litigation
- ☒ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

- | | |
|---|---|
| ☒ NGOs | ☒ Local communities |
| ☒ Customers | ☒ Indigenous peoples |
| ☒ Employees | ☒ National and/or subnational governments |
| ☒ Investors | |
| ☒ Suppliers | |

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

Select from:

☒ Yes

(2.2.2.18) Further details of process

Domtar identifies, assesses, and manages forest-related dependencies, impacts, risks and opportunities through an integrated process combining our Double Materiality Assessment (DMA), annual risk management framework, and 20-25 year forest management (FM) plans. This comprehensive approach ensures that forest-related considerations are systematically evaluated and integrated into our strategic and operational decision-making. Dependencies: Our business fundamentally depends on a sustainable and consistent fiber supply from managed forests in Canada and the United States. We assess these dependencies through our FM plans, which evaluate long-term forest productivity, species composition, age class distribution, and climate resilience at the sub-national (state and provincial) level, as well as in terms of local and site-specific considerations. Plans incorporate government research on how climate change may affect species mix and geographic distribution over extended time horizons. Our dependency on ecosystem services—including natural regeneration capacity, watershed protection, soil health, pollination, and the biodiversity that supports overall forest health and resilience—is monitored through ongoing collaboration with federal, provincial and state governments, Indigenous communities, and other stakeholders. We also assess our dependency on the regulatory and social license frameworks that enable our forest operations, recognizing that maintaining strong relationships with governments and local communities is essential to continued access to fiber resources. Impacts: We assess our impacts on forest ecosystems through ISO, FSC, SFI and PEFC certification audits, government reporting requirements, and internal monitoring programs. Key impact areas include harvesting practices, habitat disturbance, changes to forest structure and composition, and forest regeneration outcomes. We implement comprehensive mitigation strategies to minimize negative impacts, including identifying and protecting areas of high conservation value, applying progressive harvesting practices that maintain forest cover and connectivity, retaining wildlife trees and nesting sites, establishing riparian buffer zones to protect water quality and aquatic habitats, and ensuring successful natural and planted regeneration following harvest activities. In coordination with provincial governments and conservation organizations, we identify critical habitats for species of interest, such as the woodland caribou, and implement management practices to minimize disturbance and maintain compliance with conservation regulations. Our managed forests encompass approximately 22 million hectares, with 43% under regulated or non-regulated protection measures. Risks and Opportunities: Our DMA and annual risk management process evaluate forest-related risks, including evolving regulatory requirements (such as EUDR and certification standards), potential supply disruptions from climate-related impacts on forest health, reputational risks from stakeholder concerns about forest practices, and market access risks if certification requirements are not maintained. Opportunities include enhanced market access and price premiums through certified fiber sourcing, strengthened customer relationships as buyers increasingly prioritize sustainable supply chains, the environmental benefits of carbon sequestration in managed forests, and potential participation in emerging carbon credit markets.

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

- ☒ Sub-national
- ☒ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- ☒ EcoVadis

Enterprise Risk Management

- ☒ Enterprise Risk Management

International methodologies and standards

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

Databases

- ☒ Nation-specific databases, tools, or standards, please specify

Other

- ☒ Scenario analysis
- ☒ Desk-based research
- ☒ External consultants
- ☒ Materiality assessment
- ☒ Internal company methods
- ☒ Jurisdictional/landscape assessment
- ☒ Partner and stakeholder consultation/analysis

(2.2.2.15) Risk types and criteria considered

Acute physical

- ☒ Drought
- ☒ Wildfires
- ☒ Disease or pests
- ☒ Invasive species
- ☒ Heavy precipitation (rain, hail, snow/ice)
- ☒ Flood (coastal, fluvial, pluvial, ground water)
- ☒ 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
- ☒ Protected area designation
- ☒ Regulation of noise pollution

Market

- ☒ Changing customer behavior
- ☒ Lack of availability and/or increased cost of certified sustainable material

Reputation

- ☒ Impact on human health
- ☒ Increased concern and/or negative feedback from partners and stakeholders
- ☒ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g., GHG emissions, deforestation & conversion, water stress, excessive bycatch)
- ☒ Stigmatization of sector

Technology

- ☒ Transition to lower emissions technology and products
- ☒ Unsuccessful investment in new technologies

Liability

- ☒ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

- | | |
|---|---|
| ☒ NGOs | ☒ Regulators |
| ☒ Customers | ☒ Local communities |
| ☒ Employees | ☒ Indigenous peoples |
| ☒ Investors | ☒ National and/or subnational governments |
| ☒ Suppliers | |

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

Select from:

- ☒ Yes

(2.2.2.18) Further details of process

Domtar identifies, assesses, and manages climate-related dependencies, impacts, risks and opportunities through our Double Materiality Assessment (DMA), annual risk management process, and integration with our global decarbonization strategy. This approach ensures climate considerations are systematically evaluated from both financial and impact perspectives and integrated into strategic and operational decision-making. Dependencies: Our operations depend on stable climate conditions for forest productivity and fiber supply security, reliable water availability for manufacturing processes, and consistent hydroelectric power generation. We assess these dependencies through our DMA and ongoing monitoring of climate variables affecting our facilities and fiber supply regions. Climate stability directly influences the long-term productivity of managed forests, affecting species composition, growth rates, and regeneration success. Insights from climate-focused analysis conducted prior to our corporate integration continue to inform our understanding of physical climate risks across our operations, including potential impacts from changing precipitation patterns, temperature extremes, and increased frequency of severe weather events. Impacts: We measure and manage our climate impacts through comprehensive GHG emissions tracking across Scopes 1, 2, and 3, with public reduction targets embedded in our operational strategic development plans (our current target is under development). Our Scope 1 and 2 emissions are monitored at the facility level, while Scope 3 emissions management focuses on upstream supply chain activities including fiber sourcing and transportation. Our impact mitigation strategies include energy efficiency upgrades, fuel-switching initiatives, renewable energy sourcing (including biomass from manufacturing residuals and hydroelectricity), and engagement with upstream suppliers on emissions reduction practices. We report emissions performance annually and track progress against public commitments. Risks and Opportunities: Our DMA identified material climate risks including carbon pricing mechanisms, physical risks to facilities from extreme weather, supply chain disruptions from climate impacts on forest health, regulatory transition risks from evolving climate policies, and changing customer expectations for lower-carbon products. We evaluate these risks by likelihood and potential financial magnitude, including impacts on operating costs, capital expenditure, and revenue. Findings directly inform our annual budget, procurement strategies, and operational planning. In the medium term (1-5 years), we evaluate payback periods on major decarbonization projects, prioritizing investments delivering both emissions reductions and cost savings. In the long term (5+ years), we apply insights to stress test our business model, anticipate carbon pricing trajectories, and avoid stranded asset risks. Climate opportunities include operational cost savings from energy efficiency, competitive positioning through decarbonization leadership, growth in demand for lower-carbon products, carbon sequestration benefits from managed forests, and access to sustainability-linked financing. The DMA prepares us for disclosures on Governance, Strategies, Actions and Plans for material climate impacts, risks and opportunities, ensuring integration into decision-making aligned with ISSB, TNFD and ESRS.

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

☒ Dependencies

- ☒ 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 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

(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
- ☒ Local
- ☒ Sub-national
- ☒ National

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

- ☒ EcoVadis
- ☒ IBAT – Integrated Biodiversity Assessment Tool
- ☒ LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD

Enterprise Risk Management

- ☒ Enterprise Risk Management

Other

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

(2.2.2.15) Risk types and criteria considered

Chronic physical

- ☒ Declining ecosystem services
- ☒ Increased ecosystem vulnerability

Reputation

- ☒ Increased concern and/or negative feedback from partners and stakeholders

Technology

- ☒ Lack of access to data or monitoring systems
- ☒ Unsuccessful investment in new technologies

Liability

- ☒ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

- | | |
|---|--|
| ☒ NGOs | ☒ Regulators |
| ☒ Customers | ☒ Local communities |
| ☒ Employees | ☒ Indigenous peoples |
| ☒ Investors | |
| ☒ Suppliers | |

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

Select from:

- ☒ Yes

(2.2.2.18) Further details of process

Domtar identifies, assesses, and manages biodiversity-related dependencies, impacts, risks and opportunities through our Double Materiality Assessment (DMA), forest management planning processes, and site-level assessments aligned with emerging frameworks such as TNFD as well as sub-national and national regulatory frameworks such as species-at-risk legislation. Dependencies: Our business depends on healthy forest ecosystems that provide essential services including natural

forest regeneration, pollination, pest control, soil health maintenance, and watershed function. These ecosystem services are fundamental to the long-term productivity of the forests we manage and our continued access to sustainable fiber supply. We assess these dependencies through our 20-25 year forest management (FM) plans developed in collaboration with government agencies, Indigenous communities, and other stakeholders, and through our DMA, which evaluated the materiality of ecosystem service dependencies to our operations across our value chain. **Impacts:** We assess our biodiversity impacts through a comprehensive review of operational sites owned, leased, and managed in or adjacent to protected areas and areas of high biodiversity value. This review focused on forest management units (FMUs) in Quebec and Ontario where the majority of our managed woodlands are located, finding that 43% of the total area we manage (23.5 million acres or 9.5 million hectares) is under regulated or non-regulated protection. Regulated protection includes nature reserves, national parks, wilderness areas, and other designations classified under the IUCN system. Non-regulated protection covers reserves, candidate lands for protected areas, wetlands, species-at-risk deferrals, and less productive forest areas. We implement comprehensive biodiversity protection strategies including identification and protection of high conservation value areas, progressive harvesting practices that maintain forest structure and connectivity, retention of wildlife and nesting trees, buffering around eagle nests and other sensitive sites, riparian green belts to protect aquatic habitats, and ensuring successful natural and planted forest regeneration. In coordination with provincial governments and conservation organizations, we identify critical habitat areas for species of interest, such as the woodland caribou, ensuring our forest management plans protect these areas and minimize population disturbance. FSC, SFI and PEFC certification audits provide external verification of our biodiversity management practices. **Risks and Opportunities:** Our DMA identified biodiversity-related risks, including ecosystem service disruption affecting forest productivity, regulatory non-compliance with species protection requirements, potential certification loss (FSC/SFI/PEFC), challenges with Indigenous communities, and increased stakeholder scrutiny of forest practices. Opportunities include strengthened certifications enhancing market access, enhanced community and Indigenous relationships, alignment with growing customer expectations for responsibly sourced products, and potential participation in emerging ecosystem service markets. These assessments inform our annual risk management process and capital allocation decisions, with biodiversity considerations integrated into long-term forest management planning and operational practices.

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

- ☒ EcoVadis
- ☒ WRI Aqueduct

Enterprise Risk Management

- ☒ Enterprise Risk Management

International methodologies and standards

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

Other

- ☒ Desk-based research
- ☒ Internal company methods
- ☒ Materiality assessment
- ☒ Partner and stakeholder consultation/analysis
- ☒ Scenario analysis

(2.2.2.15) 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

(2.2.2.16) Partners and stakeholders considered

Select all that apply

- ☒ NGOs
- ☒ Customers
- ☒ Employees
- ☒ Investors
- ☒ Suppliers
- ☒ Regulators
- ☒ Local communities
- ☒ Indigenous peoples
- ☒ Other water users at the basin/catchment level

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

Select from:

- ☒ Yes

(2.2.2.18) Further details of process

Domtar identifies, assesses, and manages water-related dependencies, impacts, risks and opportunities through our Double Materiality Assessment (DMA), annual risk management process, and site-specific operational planning. This approach ensures water considerations are systematically evaluated and incorporated into strategic and operational decision-making across all facilities. Dependencies: Our pulp, paper and tissue manufacturing processes depend on significant amounts of water for production, cooling and processing, making water availability a critical operational dependency. We also depend on water resources for hydroelectric power generation, particularly in the Lac-Saint-Jean region of Quebec where hydroelectricity from our dams powers some of our mills, providing cost-effective, low-carbon energy. We assess these dependencies through our DMA and ongoing monitoring of water-related variables including precipitation patterns, seasonal water availability, water quality, and watershed health across our operating regions. We also monitor upstream watershed conditions that could affect water availability to our facilities. Impacts: We assess our water impacts through discharge permit compliance monitoring, effluent quality tracking, thermal discharge management, and evaluation of water use relative to local watershed capacity. Our manufacturing processes involve significant water intake and wastewater discharge, and we monitor performance against regulatory requirements, our publicly-facing intensity target, and internal targets at each facility. We implement water efficiency measures, closed-loop systems where feasible, and advanced wastewater treatment to minimize impact on local water resources and aquatic ecosystems. We engage with local communities and regulatory authorities to ensure our practices align with watershed management objectives. Risks and Opportunities: Our DMA and annual risk management process evaluate water-related risks, including flooding and extreme precipitation, drought and seasonal availability constraints, regulatory changes affecting water rights or discharge permits, water quality degradation, and competition for water resources in water-stressed regions. We evaluate these risks by likelihood and potential financial magnitude. In the short term, findings inform site-specific mitigation measures, capital allocation for flood defenses, and production scheduling adjustments. In the medium term, they guide investments in water management infrastructure, alternative energy sourcing, and process efficiency initiatives. Over the long term, insights support strategic decisions regarding mill location, design, and operation, ensuring resilience against water-related physical risks. Opportunities include operational cost savings from water efficiency, reduced regulatory compliance costs, strengthened relationships with regulators and communities, and enhanced reputation through responsible water stewardship. Our water strategy is integrated with our broader environmental management approach, recognizing interconnections between water availability, forest health, climate resilience, and biodiversity.

[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

Domtar assesses interconnections between environmental dependencies, impacts, risks and opportunities through our Double Materiality Assessment (DMA), annual risk management process, and long-term strategic planning frameworks. These processes recognize that climate, forests, biodiversity and water are interconnected systems that influence the resilience of our operations, supply chain and long-term business performance. Our DMA explicitly evaluated relationships across these environmental themes and identified how impacts, risks and opportunities can create cascading effects throughout our value chain. These interconnections continue to be assessed through our annual risk management process, where environmental risks and mitigation measures are evaluated in an integrated manner rather than as standalone issues. Climate change is a key driver of interconnected environmental risks. Changes in precipitation patterns and water availability can affect

manufacturing operations and the hydroelectric power that supports our Lac-Saint-Jean facilities. Climate-related changes in forest health, species composition, and geographic distribution can also affect the long-term availability and resilience of fiber supply. These considerations are incorporated into our forest management and harvest planning processes. Forests, biodiversity, and water are similarly linked. Biodiversity supports ecosystem functions such as natural regeneration, pest resistance, and watershed health, while healthy forests help regulate water flows, protect watersheds, and contribute to carbon sequestration. As a result, biodiversity loss, forest degradation, or watershed impacts can have implications for both operational resilience and long-term fiber availability. Domtar also evaluates opportunities created by these interconnections. Certified sustainable forest management supports market access while contributing to biodiversity conservation, carbon sequestration, and watershed protection. Energy efficiency and decarbonization initiatives can reduce greenhouse gas emissions while improving operational resilience and reducing exposure to future carbon costs. These linkages extend across our value chain. Upstream, climate-related impacts on forests may influence fiber availability, while downstream, customer expectations regarding environmental performance can affect market access and demand. Our approach to Scope 3 emissions management reflects these broader connections between environmental impacts, dependencies, risks, and business performance. The results of these assessments are integrated into governance, risk management, strategic planning, and capital allocation decisions, helping Domtar address environmental challenges and opportunities holistically rather than through separate environmental programs.

[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

Domtar has identified priority locations for water-related risk based on its latest assessment using the WRI Aqueduct tool in July 2026. The assessment identified Nekoosa, Wisconsin; Rothschild, Wisconsin; and Sanford, Florida as mills located in high-risk water stress areas, which are projected to remain high risk through 2050 under a business-as-usual scenario. Plymouth, North Carolina and West Carrollton, Ohio are located in medium-high risk areas. By 2050, Plymouth is projected to increase to high risk, while West Carrollton is projected to remain medium-high risk under a business-as-usual scenario. All other mills are currently considered low risk or low-medium risk, with no projected increase through 2050 under the same scenario. Domtar also considers biodiversity-related priority locations through its forest, fiber supply chain and operational footprint. Biodiversity considerations are incorporated into sustainable forest management, responsible fiber sourcing, certification requirements, conservation planning and operational risk assessments. Priority biodiversity considerations include areas with ecological sensitivity, important habitats, species or ecosystem vulnerability, and locations where Domtar has material dependencies or impacts related to wood and fiber supply, land management, water availability and ecosystem resilience.

(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-2026-CDP.pdf

[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 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). 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) Details of policies and processes in place to identify and classify potential water pollutants

Domtar identifies and classifies potential water pollutants associated with its activities through its Environmental Policy, facility-level environmental management processes, chemical review procedures, permit compliance programs, supplier requirements, inventory controls and environmental risk and compliance audits. Domtar's Environmental Policy establishes expectations for environmental compliance, responsible resource use, pollution prevention, environmental risk management and continuous improvement. This provides the governance framework for managing potential impacts to water ecosystems and human health from manufacturing activities, chemical use, wastewater discharges and stormwater management. At the facility level, potential water pollutants are identified through site-specific environmental permits, which define monitoring obligations, discharge limits and regulated parameters based on applicable regulatory requirements and receiving watersheds. Because mills operate in different watersheds, monitoring requirements vary by site. Potential pollutants may include chemicals used for pulp brightness, pH control, effluent treatment and process operations, as well as wastewater discharge parameters regulated by permit. Domtar reviews chemicals before use through joint Operations and Environment assessments. These reviews consider chemical state, toxicity, worker and environmental health and safety risks, potential impacts on effluent treatment systems, spill risk and availability of lower-risk alternatives. Some substances have been prohibited due to toxicity even where not legally required, while others are selected to reduce environmental or operational risk. Chemical suppliers must meet Domtar's health, safety and environmental requirements for transportation, delivery and handling. Inventories are tracked to support spill identification and abnormal consumption monitoring. Facilities are also reviewed through Domtar's environmental risk and compliance audit program on a recurring cycle. Together, these processes help identify and manage higher-risk substances and discharge parameters, support permit compliance, and reduce potential impacts to water ecosystems and human health.
[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

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

☒ Compliance with discharge permits / regulatory limits

☒ % of wastewater reused or recycled, please specify :Waste water that is reused and subsequently treated and returned to the environment, as wood naturally contains very low levels of nitrogen compounds that may end up in process waters for pulp and paper production.

☒ Third-party audits and/or certification

(2.5.1.6) Please explain

Domtar takes a structured, enterprise-wide approach to managing potential water pollutants through environmental management systems, regulatory compliance programs, and continuous improvement processes. In 2025, Domtar implemented a companywide Environmental Policy endorsed by business unit presidents, reinforcing compliance with environmental laws, regulations, and voluntary commitments. Approximately 86% of manufacturing and woodlands operations are ISO 14001 certified, and all facilities operate under site-specific environmental management systems that establish targets, identify environmental risks, and implement mitigation measures. Facility environmental coordinators oversee compliance and treatment system performance, while corporate sustainability teams provide

oversight and guidance. Water stewardship measures include primary and secondary effluent treatment for all withdrawn water prior to reuse or environmental discharge, water recycling practices, and ongoing efforts to reduce pollutant loads and improve water-use efficiency. Effectiveness is evaluated through continuous monitoring of wastewater treatment performance, analysis of effluent discharge data, compliance with permit requirements, tracking of site-specific environmental targets, and implementation of water risk mitigation plans. In 2025, approximately 92% of withdrawn water was returned to the environment after treatment, supporting transparency and continuous improvement toward our 2030 water goals.

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

☒ Industrial and chemical accidents prevention, preparedness, and response

☒ Other, please specify :Beyond compliance with regulatory requirements

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

☒ Compliance with discharge permits / regulatory limits

- ☒ Third-party audits and/or certification

(2.5.1.6) Please explain

Domtar takes a structured, enterprise-wide approach to managing potential water pollutants through environmental management systems, regulatory compliance programs, and continuous improvement processes. In 2025, Domtar implemented a companywide Environmental Policy endorsed by business unit presidents, reinforcing compliance with environmental laws, regulations, and voluntary commitments. Approximately 86% of manufacturing and woodlands operations are ISO 14001 certified, and all facilities operate under site-specific environmental management systems that establish targets, identify environmental risks, and implement mitigation measures. Facility environmental coordinators oversee compliance and treatment system performance, while corporate sustainability teams provide oversight and guidance. Water stewardship measures include primary and secondary effluent treatment for all withdrawn water prior to reuse or environmental discharge, water recycling practices, and ongoing efforts to reduce pollutant loads and improve water-use efficiency. Effectiveness is evaluated through continuous monitoring of wastewater treatment performance, analysis of effluent discharge data, compliance with permit requirements, tracking of site-specific environmental targets, and implementation of water risk mitigation plans. In 2025, approximately 92% of withdrawn water was returned to the environment after treatment, supporting transparency and continuous improvement toward our 2030 water goals.

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

Domtar tracks high biological oxygen demand (BOD) in the water used at its pulp, paper and tissue mills, as BOD is harmful to ecosystems in that 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

- ☒ Industrial and chemical accidents prevention, preparedness, and response

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

- ☒ Compliance with discharge permits / regulatory limits
- ☒ Third-party audits and/or certification

(2.5.1.6) Please explain

Domtar takes a structured, enterprise-wide approach to managing potential water pollutants through environmental management systems, regulatory compliance programs, and continuous improvement processes. In 2025, Domtar implemented a companywide Environmental Policy endorsed by business unit presidents, reinforcing compliance with environmental laws, regulations, and voluntary commitments. Approximately 86% of manufacturing and woodlands operations are ISO 14001 certified, and all facilities operate under site-specific environmental management systems that establish targets, identify environmental risks, and implement mitigation measures. Facility environmental coordinators oversee compliance and treatment system performance, while corporate sustainability teams provide oversight and guidance. Water stewardship measures include primary and secondary effluent treatment for all withdrawn water prior to reuse or environmental discharge, water recycling practices, and ongoing efforts to reduce pollutant loads and improve water-use efficiency. Effectiveness is evaluated through continuous monitoring of wastewater treatment performance, analysis of effluent discharge data, compliance with permit requirements, tracking of site-specific environmental targets, and implementation of water risk mitigation plans. In 2025, approximately 92% of withdrawn water was returned to the environment after treatment, supporting transparency and continuous improvement toward our 2030 water goals.

[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

Domtar has assessed plastics-related risks across its operations and value chain and determined do not have a material effect on the business. As a pulp, paper and wood products manufacturer, our most significant environmental risks and opportunities relate to climate, forests, water and biodiversity. While plastics are not currently an immediate strategic priority, we will continue to monitor emerging regulations, stakeholder expectations, and potential risks and opportunities.
[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 manufacturing facilities are subject to carbon pricing mechanisms, including provincial Output-Based Pricing Systems (OBPS), the Quebec-California cap-and-trade program, and fuel-related carbon charges. These programs create a transition risk by increasing operating costs and exposing Domtar to future increases in carbon compliance costs across its pulp, paper, packaging, tissue and wood products operations. Facilities in British Columbia and Saskatchewan are subject to emissions performance benchmarks, while facilities in Quebec are subject to cap-and-trade requirements or carbon charges applied to fuel consumption, transportation and woodlands operations. Facilities that exceed emissions performance thresholds or allocated allowances may be required to purchase credits or pay compliance costs, increasing operating expenses and affecting cash flows. As carbon prices increase and climate-related regulations become more stringent, Domtar may face higher compliance costs, increased capital expenditures to reduce emissions, and additional investments to maintain the competitiveness of its manufacturing operations.

(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

Carbon pricing mechanisms increased operating costs at regulated Canadian facilities through carbon compliance obligations, fuel-related carbon charges and the need to purchase emission allowances or credits where applicable. These costs negatively affected financial performance by increasing production and operating expenses and reducing margins at emissions-intensive facilities. The risk also influenced capital allocation decisions, requiring investment in emissions reduction and energy efficiency projects to manage future compliance obligations. Cash flows were affected through expenditures associated with carbon compliance and decarbonization initiatives.

(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

Over the short and medium term, increasing carbon prices and evolving climate-related regulations may increase compliance costs across Domtar's Canadian manufacturing operations, including costs associated with carbon charges, emissions allowances and regulatory obligations. Higher carbon costs may increase production and operating expenses, reducing margins and affecting financial performance, particularly at emissions-intensive facilities. Additional capital expenditures may be required to implement emissions reduction, energy efficiency and process optimization projects necessary to maintain compliance and improve competitiveness. Cash flows may be impacted by expenditures related to carbon compliance, decarbonization initiatives and operational improvements. If carbon prices continue to increase and regulatory requirements become more stringent, these costs could have a substantive adverse effect on operating profitability and cash flow generation across Domtar's manufacturing network.

(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)

17828082

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

33520279

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

33520279

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

142099385

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

142099385

(3.1.1.25) Explanation of financial effect figure

The financial figure sums the carbon cost exposure for each of the mills that operates in a jurisdiction with an industrial emissions pricing system. The increase over time anticipates the increasing cost of carbon over time, as published by the relevant regulator.

(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

10000000

(3.1.1.28) Explanation of cost calculation

The cost of response to risk is based on an estimation of the capital expenditures that would be required to reduce emissions at mills located in jurisdictions with industrial emission pricing systems such that the compliance costs would be lower or the mills would generate emission performance credits.

(3.1.1.29) Description of response

As part of our sustainability strategy launch in 2025, Domtar committed to establish an emission reduction target by the end of 2026. As a key part of the target-setting process, Domtar is establishing a scenario-based analysis of decarbonization roadmap(s). This analysis is ongoing at the time of disclosure, and so Domtar anticipates that the estimate of the Cost of response to risk to improve in accuracy in the next reporting cycle.

Forests

(3.1.1.1) Risk identifier

Select from:

☒ Risk2

(3.1.1.2) Commodity

Forests commodity

☒ 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

Domtar's operations and suppliers in Canada and the United States are exposed to climate-related changes that influence the frequency, intensity and duration of wildfires, creating risks to forest productivity, timber availability and long-term fiber supply. Wildfires can reduce annual allowable harvest levels, disrupt harvesting activities, increase fiber procurement costs and affect access to forest resources. Additional costs may be incurred through salvage harvesting, road construction, wood sorting, and the relocation of woodland operations. Productivity and efficiency of harvesting teams and mill operations may also be affected. In 2025, 598,968 hectares (approximately 1,480,082 acres) of forest were affected by fires within Domtar's Canadian supply zone, where our sawmills source approximately 80% of their fiber from Domtar-managed forests. In comparison, approximately 105 000 hectares were affected in 2024 and more than 1.5 million hectares were affected in 2023, demonstrating the potential scale and variability of wildfire impacts. Severe wildfire activity can reduce timber availability, increase competition for fiber resources and affect the long-term productivity of managed forests. Given the extended period required for forest regeneration following major fire events, wildfire remains a significant risk to maintaining a resilient and sustainable fiber supply for our operations.

(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

Wildfires may adversely affect financial performance and cash flows through reduced timber availability, lower harvest volumes, higher fiber procurement costs, operational disruptions, additional salvage harvesting and access costs, and reduced efficiency of harvesting and sawmill operations. Long-term forest productivity losses may also affect future fiber supply and increase raw material costs.

(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

In the short to medium term, increased wildfire activity may reduce timber availability, disrupt harvesting operations, and increase fiber procurement, transportation, access, and salvage harvesting costs. Continued wildfire impacts could reduce forest productivity, lower harvest volumes, increase competition for fiber resources, and require additional expenditures for forest recovery and operational adaptation. These impacts may increase operating costs, adversely affect financial performance and cash flows, and reduce the long-term value and productivity of forest assets.

(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)

166000000

(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)

257500000

(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, including direct and indirect losses such as infrastructure and timber losses, supply chain impacts and transportation and service interruption, are estimated to be about C\$390/ha. With 598,968 hectares of owned or managed land affected by forest fires based on 2025, the cost to Domtar is theoretically equivalent to C\$233 million (US\$166 million) - the financial impact we identified for the reporting year. 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 averaged about 3 million hectares in the past 10 years; 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 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. The maximum impact (\$257 million) is the potential financial risk over a medium-term horizon of five years.

(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 2025. In Ontario, hundreds of hectares of crown lands are subject to prescribed fire to lower the fuel build-up on the land we manage, per example after a natural disturbance such as tornado and windfall. This forest management practice reduces 70% to 100% of fine fuels and 40% to 70% of heavy fuels, globally reducing wildfire risk and improving regeneration. The ministry of Natural Resources and Forestry (MNRF) of Ontario 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:

☒ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Liability

☒ Non-compliance with regulation and legislation

(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

(3.1.1.7) River basin where the risk occurs

Select all that apply

☒ St. Lawrence

☒ Saguenay (Riviere)

☒ Roanoke River

☒ Churchill River

☒ Saint John River

☒ Mississippi River

(3.1.1.9) Organization-specific description of risk

Domtar's paper, packaging and pulp operations depend on effective wastewater treatment and stormwater management. Spills, wastewater treatment disruptions, stormwater system failures and severe weather events may result in harmful releases to water, permit or effluent-limit non-compliance, regulator enforcement, fines, remediation costs, operational restrictions, legal liabilities and reputational impacts. Potential financial impacts include fines or penalties, increased operating or capital costs, mitigation expenditures, insurance-related costs, and temporary production impacts.

(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

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

Select from:

☒ About as likely as not

(3.1.1.14) Magnitude

Select from:

☒ Medium-low

(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

In the short term, wastewater treatment disruptions, permit exceedances, spills, or stormwater management incidents could result in increased operating costs associated with remediation, monitoring, repairs, regulatory compliance, and temporary production interruptions. These events could negatively affect operating margins and cash flows. In the medium term, evolving regulatory requirements, aging infrastructure, and more frequent severe weather events may require additional capital investments in wastewater treatment and stormwater management systems, as well as higher ongoing operating and maintenance costs. Repeated incidents could also affect facility productivity and increase compliance-related expenditures, reducing financial performance and cash flow generation.

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

Select from:

☒ Yes

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

2275000

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

22750000

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

2275000

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

22750000

(3.1.1.25) Explanation of financial effect figure

The estimated financial effects reflect potential increased direct costs associated with wastewater treatment system disruptions, stormwater management failures, discharge permit exceedances, spills, and water-related infrastructure events across our operations in the Paper and Packaging and Pulp and Tissue Business Units. The lower-end estimate of \$2.275M represents the potential cost of a moderate event at one location, requiring remediation, monitoring, repairs, regulatory response, and limited production impacts. The upper-end estimate of \$22.75M represents a more severe event or multiple events across our business units involving substantial remediation efforts, extended operational disruptions, infrastructure upgrades, increased compliance requirements, and associated capital and operating expenditures.

(3.1.1.26) Primary response to risk

Compliance, monitoring and targets

☒ Improve monitoring of direct operations

(3.1.1.27) Cost of response to risk

500000

(3.1.1.28) Explanation of cost calculation

The estimated cost reflects expenditures associated with improving monitoring and oversight of water-related operations across our facilities. Costs may include enhanced wastewater and stormwater management systems, water monitoring equipment, inspection programs, monitoring equipment maintenance and upgrades, employee training, data management, reporting systems, and technical support. The estimated range represents the anticipated annual cost of implementing and maintaining enhanced monitoring activities intended to identify potential issues early, support regulatory compliance, and reduce the likelihood and severity of water-related incidents.

(3.1.1.29) Description of response

Domtar is strengthening monitoring of direct operations to improve the early detection and management of water-related risks. This includes routine monitoring of wastewater treatment performance, discharge quality, and stormwater management systems, supported by inspections, preventive maintenance activities, operational controls, and employee training. Enhanced monitoring enables facilities to identify emerging issues, respond proactively to operational changes, maintain compliance with environmental requirements, and reduce the potential for spills, permit exceedances, or other water-related incidents.

[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)

17828082

(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 the estimated carbon compliance costs incurred across Domtar's Canadian operations during the reporting year. The calculation includes direct costs associated with facilities subject to provincial Output-Based Pricing Systems (OBPS) and the Quebec-California cap-and-trade program, including the purchase of emission allowances, compliance units and other regulatory obligations. It also includes indirect carbon costs incurred through carbon charges embedded in fossil fuel purchases used in manufacturing operations, woodlands activities and transportation. The estimate was developed using actual carbon compliance expenditures, carbon charges applied to fuel consumption, emissions obligations under applicable carbon pricing programs, and projected facility-level compliance requirements. These costs directly relate to the primary financial effect of increased operating expenses resulting from carbon pricing mechanisms.

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)

166000000

(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, including direct and indirect losses such as infrastructure and timber losses, supply chain impacts and transportation and service interruption, are estimated to be about C\$390/ha. With 598,968 hectares of owned or managed land affected by forest fires based on 2025, the cost to Domtar is theoretically equivalent to C\$233 million (US\$ 166 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 3 million hectares in the past 10 years; 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)

89000000

(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

The reported amount represents water-related environmental operating expenses incurred during the reporting year, including wastewater treatment, environmental monitoring, permit compliance, and operation and maintenance of water-related infrastructure. These costs are vulnerable to water-related risks such as regulatory changes, permit exceedances, treatment system disruptions, environmental incidents, infrastructure failures, and extreme weather events that could increase operating and compliance costs.

[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

☒ Mississippi 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 2026, 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 2026, 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

☒ Saint John 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 2026, 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

United States of America

☒ 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 2026, 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?

(3.3.1) Water-related regulatory violations

Select from:

☒ Yes

(3.3.2) Fines, enforcement orders, and/or other penalties

Select all that apply

☒ Fines

☒ Enforcement orders or other penalties

(3.3.3) Comment

During the reporting year, Domtar incurred \$56,250 in water-related fines related to an effluent permit violation. Water-related compliance is monitored through site environmental management systems, routine monitoring, and regulatory reporting processes, and the issue was addressed through corrective actions.

[Fixed row]

(3.3.1) Provide the total number and financial value of all water-related fines.

(3.3.1.1) Total number of fines

1

(3.3.1.2) Total value of fines

56250

(3.3.1.3) % of total facilities/operations associated

2

(3.3.1.4) Number of fines compared to previous reporting year

Select from:

☒ Lower

(3.3.1.5) Comment

During the reporting year, Domtar incurred water-related fines totaling \$56,250 associated with an effluent permit violation. The number of water-related compliance events decreased by four compared to the previous reporting year, indicating an overall reduction in water-related regulatory non-compliance across our operations. Compliance performance is monitored through site-level environmental management systems and corporate reporting processes.

[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:

☒ Fine

(3.3.2.2) Financial impact

56250

(3.3.2.3) Country/Area & River basin

Canada

☒ Other, please specify :Kootenay River

(3.3.2.4) Type of incident

Select from:

☒ Effluent limit exceedances

(3.3.2.5) Has this incident been resolved?

Select from:

☒ Yes

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

The fine was associated with an isolated effluent permit exceedance at the Skookumchuk facility in BC. Following identification of the issue corrective actions were implemented to address the underlying cause and strengthen operational controls.

[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

☒ BC GGIRCA - ETS

☒ Québec CaT - ETS

☒ Saskatchewan OBPS - ETS

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

BC GGIRCA - ETS

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

(3.5.2.2) Scope 2 emissions approach

Select from:

☒ No compliance obligation for scope 2 emissions

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

0

(3.5.2.4) Period start date

01/01/2025

(3.5.2.5) Period end date

12/31/2025

(3.5.2.8) Verified Scope 1 emissions in metric tons CO2e

327933

(3.5.2.9) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.10) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.11) Comment

The deadline for settling compliance obligations for the 2025 compliance year in BC is after the CDP disclosure deadline, and therefore accurate data on allowances allocated and purchased is not available.

Québec CaT - ETS

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

13

(3.5.2.2) Scope 2 emissions approach

Select from:

☒ No compliance obligation for scope 2 emissions

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

0

(3.5.2.4) Period start date

01/01/2025

(3.5.2.5) Period end date

01/01/2025

(3.5.2.8) Verified Scope 1 emissions in metric tons CO2e

364867

(3.5.2.9) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.10) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.11) Comment

No scope 2 emissions are verified in this ETS. The compliance period for the Quebec cap-and-trade is ongoing, and so accurate data for allowances allocated and allowances purchased is not available at this time.

Saskatchewan OBPS - ETS

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

2

(3.5.2.2) Scope 2 emissions approach

Select from:

☒ No compliance obligation for scope 2 emissions

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

0

(3.5.2.4) Period start date

01/01/2025

(3.5.2.5) Period end date

12/31/2025

(3.5.2.8) Verified Scope 1 emissions in metric tons CO₂e

70448

(3.5.2.9) Verified Scope 2 emissions in metric tons CO₂e

0

(3.5.2.10) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.11) Comment

The Saskatchewan government paused the implementation of the carbon pricing system on April 1, 2025. No data on allowances is available since compliance was not applicable during this year.

[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 approach to compliance in each of the ETS systems we are regulated by is a coordinated effort between Environment, Finance, Procurement, and Sustainability team members. Environment and Finance team members develop the annual reporting documentation, and then collaborate with Sustainability and Procurement team members to procure and apply the required credits or allowances, or make the required payments. The mills regulated by the BC OBPS are required to comply on an annual cycle, and can comply with a mix of credit purchases and payments. In the window between the verification deadline and the compliance deadline, Sustainability, Procurement, Environment team members and mill managers coordinate on the approach to credit purchases or sale, where applicable. The mills regulated by the Quebec cap-and-trade system are required to comply on a three-year cycle, and can comply with a mix of allowances and carbon credits. Finance and Environment team members coordinate on budgeting for the required credits and allowances throughout the three-year compliance period, purchasing credits and/or allowances throughout this period of time. Domtar's strategy is to comply with each system in a timely manner, while minimizing expenditures through the use of lower-cost carbon credits where applicable. No discussion of ETS systems in Ontario and Saskatchewan is provided since the provincial programs have been paused as of April 1, 2025 and so the management team continues to monitor the regulatory landscape for any changes.

(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: ☒ Yes, we have identified opportunities, and some/all are being realized
Forests	Select from:

	Environmental opportunities identified
	☒ Yes, we have identified opportunities, and some/all are being realized
Water	<i>Select from:</i> ☒ 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

Markets

☒ Stronger competitive advantage

(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 has identified an opportunity to reduce climate-related compliance costs and create financial value through optimization of its participation in carbon pricing and industrial emissions programs in jurisdictions where it operates. Facilities that achieve emissions performance below applicable regulatory benchmarks may generate surplus compliance credits that can be retained for future obligations, transferred within the organization, or sold where program rules permit. This opportunity is particularly relevant in Canadian jurisdictions where carbon pricing mechanisms create direct economic incentives for emissions reductions. Through energy efficiency initiatives, fuel optimization, process improvements and other emissions reduction activities, Domtar may reduce compliance obligations while increasing the potential value of surplus credits. The opportunity is supported by existing regulatory frameworks, established carbon markets and internal carbon cost modelling that considers projected emissions, benchmark obligations, anticipated credit generation and forecast carbon prices. As carbon prices increase, the value of avoided compliance costs and surplus credits may further enhance financial performance, cash flows and operational competitiveness

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Returns on investment in low-emission technology

(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

Optimizing participation in carbon pricing and industrial emissions programs may improve Domtar's financial performance by reducing carbon compliance costs and limiting expenditures associated with the purchase of external compliance credits. Facilities that achieve emissions levels below applicable regulatory benchmarks may generate surplus credits that can be banked for future compliance obligations, used within the organization to offset costs at other facilities, or sold where program rules permit. These outcomes may reduce operating expenses, improve margins and provide an additional source of revenue. Cash flows may benefit from avoided compliance expenditures and potential proceeds associated with surplus credits. As carbon prices increase, the financial value of avoided carbon costs and credit generation opportunities may increase, further strengthening the business case for emissions reduction initiatives and improving the competitiveness of Domtar's manufacturing operations.

(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

Over the short and medium term, Domtar anticipates that optimizing participation in carbon pricing and industrial emissions programs may reduce future compliance costs and improve financial performance. Facilities that achieve emissions levels below regulatory benchmarks may generate surplus compliance credits that can be retained for future compliance needs, used to reduce obligations at other facilities, or sold where program rules permit. As carbon prices increase, the value of avoided compliance costs and surplus credits may increase, providing additional financial benefits. The opportunity may improve operating margins by reducing carbon-related expenses and may strengthen cash flows through lower compliance expenditures and potential proceeds from credit transactions. Over time, continued emissions reductions and effective management of carbon market participation may enhance the competitiveness and resilience of Domtar's manufacturing operations while reducing exposure to future regulatory cost increases.

(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)

1018000

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

1018000

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

1300000

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

1300000

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

8617000

(3.6.1.23) Explanation of financial effect figures

The financial effect figures represent current and anticipated future revenue from the sale of emissions performance credits. These credits are generated by mills that perform better than the regulatory benchmark and are subsequently sold within the provincial carbon credit market and realized as revenue for the mills.

(3.6.1.24) Cost to realize opportunity

10000000

(3.6.1.25) Explanation of cost calculation

This cost calculation estimates near term capital expenditure that would be required to achieve additional GHG emission reductions at regulated mills, in order to reduce compliance costs or realize carbon credit revenue. As part of our target setting process, we are developing a detailed roadmap for emission reduction projects at specific mills. This roadmap will further refine this cost estimate for future reporting. The cost to realize opportunity value could increase following this work.

(3.6.1.26) Strategy to realize opportunity

Domtar's strategy is to reduce greenhouse gas emissions and optimize performance under applicable carbon pricing and industrial emissions programs. The company evaluates and implements emissions reduction, energy efficiency, fuel optimization and process improvement projects that reduce compliance obligations and improve performance relative to regulatory benchmarks and emissions allocations. Domtar monitors carbon pricing requirements, projected emissions, benchmark performance, and compliance credit markets to identify opportunities to reduce compliance costs and maximize the value of surplus credits where permitted. By integrating carbon cost considerations into operational and capital planning, Domtar seeks to lower future compliance expenditures, improve competitiveness, and capture financial value through the generation, retention, transfer, or sale of compliance credits.

Forests

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

(3.6.1.2) Commodity

Forest commodity

☒ 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

☒ United States of America

(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 2025, 100% of the forests we managed were certified to the SFI Forest Management Standard (21.7 million hectares). We also maintain FSC Forest Management certification on 35% of this land area (7.6 million hectares).

(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
- ☒ 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:

- ☒ 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

Domtar's commitment to producing quality products that meet the criteria of today's environmentally conscious stakeholders begins with responsible fiber sourcing. 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, and third-party-verified forest certification standards provide us with a competitive edge. Customers continue to demand this level of assurance, and the growth in the demand and sales of these products is vital to our financial position. We are among the largest holders of SFI and FSC certificates in North America. In 2025, 100% of the forests we managed were certified to the SFI Forest Management Standard (21.7 million hectares). We also maintain FSC Forest Management certification on 35% of this land area (7.6 million hectares).

(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. The combined impact of these economic and political forces is already an opportunity we are seizing to secure our financial position - from the profitability of our premium products to increasing positive cash flows on our bottom line. Our 2030 Sustainability Strategy includes commitments designed to further capitalize on this opportunity, most notably, a pledge to maintain internationally recognized forest management standards at 100% of Domtar-managed woodlands, as well as CoC certification at 100% of our manufacturing facilities. This work builds on the concrete results achieved previously by our legacy companies, such as Resolute's 2026 commitment to increasing externally sourced fiber that is third-party certified to more than 75%, which we achieved ahead of schedule in 2023.

(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)

2325000000

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

2325000000

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

2325000000

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

11625000000

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

15000000000

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

23250000000

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

30000000000

(3.6.1.23) Explanation of financial effect figures

The financial effect figures represent current and anticipated future revenue from the sale of the certified forest products we sell. Short-term projections are based on our 2025 sales of paper, pulp, tissue and wood products sold with certification, and minimum medium and long term forecasts are conservative estimates compounded over five and ten years, respectively, using those same 2025 figures. Maximum forecasts are rounded figures that assume modest growth in sales over these two time horizons.

(3.6.1.24) Cost to realize opportunity

3500000

(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. Direct costs related to developing fiber tracking systems, implementing certification, undertaking audits and monitoring best practices exceed \$3.5 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

Resource efficiency

☒ Other resource efficiency opportunity, please specify :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 critical to Domtar's pulp, paper and tissue manufacturing operations and supports the company's ability to generate renewable electricity through its. Domtar's hydroelectric facilities like the Hydro-Saguenay hydroelectric network in the Saguenay-Lac-Saint-Jean region of Quebec, provide low-carbon electricity to several operations, reducing reliance on third-party energy purchases and supporting long-term energy security. In 2025, several facilities continued to meet a significant portion of their electricity needs through internally generated renewable energy. Long-term water rights agreements supporting hydroelectric generation provide a stable foundation for ongoing renewable energy production. This creates an opportunity to reduce exposure to electricity market volatility, support decarbonization objectives, and strengthen the competitiveness of Domtar's manufacturing operations.

(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

Domtar's hydroelectric generation assets continued to provide renewable electricity to several operations during the reporting year, reducing reliance on purchased electricity and limiting exposure to energy price volatility. This opportunity contributed positively to financial performance through lower operating costs and supported cash flows through avoided energy expenditures. The opportunity also supports Domtar's financial position by increasing the value derived from long-lived hydroelectric assets and associated water rights agreements. The estimated financial benefit associated with avoided electricity purchases and hydroelectric generation is reflected in the reported financial effect figure.

(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

Over the short and medium term, Domtar expects continued access to reliable water resources and hydroelectric generation capacity to reduce exposure to electricity price volatility and support lower energy costs across operations that benefit from internally generated renewable power. This opportunity may improve financial performance through reduced operating expenses and enhanced margins resulting from lower purchased electricity requirements. Cash flows may benefit from ongoing cost savings associated with hydroelectric generation and reduced dependence on third-party energy suppliers. The opportunity may also strengthen

Domtar's financial position by increasing the long-term value derived from its hydroelectric assets and associated water rights agreements, supporting energy security, operational resilience and the competitiveness of its manufacturing operations.

(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)

28500000

(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)

142500000

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

240000000

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

285000000

(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-year (medium-term) and 10-year (long-term) horizons using the current annualized impacts (low and high).

(3.6.1.24) Cost to realize opportunity

10000000

(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)

17828082

(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

The financial metric reflects the operating expenses of Domtar's operations that are located in jurisdictions where industrial emissions programs exist. The estimate was developed using facility-level carbon compliance models, projected emissions, regulatory benchmark obligations, anticipated compliance costs, and potential credit generation opportunities under applicable carbon pricing programs. The calculation considers facilities operating in jurisdictions where carbon pricing mechanisms apply, including British Columbia and Quebec. Financial benefits may be realized through avoided compliance costs, reduced purchases of external credits, and the potential generation, use, transfer or sale of surplus compliance credits where permitted. The proportion reported reflects the share of the selected financial metric associated with facilities and operations that may benefit from these opportunities based on current emissions profiles, carbon pricing exposure and anticipated participation in compliance credit markets.

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)

2325000000

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

Select from:

☒ 31-40%

(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 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 2025, 100% of the forests we managed were certified to the SFI Forest Management Standard (21.7 million hectares). We also maintain FSC Forest Management certification on 35% of this land area (7.6 million hectares).

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

Domtar's access to water supports the operation of hydroelectric generation assets and the production of internally generated renewable electricity at several facilities. This reduces reliance on purchased electricity and helps mitigate exposure to energy price volatility. As a result, a portion of the company's operating expenditures is directly associated with the use of water resources that enable renewable power generation and support energy security across operations. Long-term water rights agreements and hydroelectric assets provide ongoing opportunities to reduce electricity-related operating costs and improve operational resilience. The reported financial metric reflects operating expenditures that are aligned with the substantive effects of this water-related opportunity through avoided energy purchases and reduced exposure to external electricity costs.

[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: ☒ Yes
Forests	Select from: ☒ Yes
Water	Select from: ☒ Yes
Biodiversity	Select from: ☒ 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

☒ Other, please specify :Global Sustainability Steering Committee

(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
- ☒ Other policy applicable to the board, please specify :Committee Charters, Global Sustainability Policy, Environmental Policy

(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

- | | |
|--|--|
| ☒ Reviewing and guiding annual budgets | ☒ Reviewing and guiding innovation/R&D priorities |
| ☒ Overseeing the setting of corporate targets | ☒ Overseeing and guiding major capital expenditures |
| ☒ Monitoring progress towards corporate targets | ☒ Overseeing reporting, audit, and verification processes |
| ☒ Overseeing and guiding value chain engagement | ☒ Overseeing and guiding the development of a business strategy |
| ☒ Approving corporate policies and/or commitments | ☒ Overseeing and guiding acquisitions, mergers, and divestitures |
| ☒ 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

Overall responsibility for Domtar's Sustainability Strategy and environmental performance resides with the Global Sustainability Steering Committee (GSSC), to which sustainability oversight has been delegated by the Executive Committee (ExCo). The GSSC is an executive-level governance body composed of ExCo members and other senior leaders, including business unit presidents. It oversees Domtar's sustainability strategy and policy framework, reviews environmental performance metrics and progress against targets, monitors material environmental impacts, risks and opportunities, and supports the integration of sustainability considerations into strategic decision-making and risk management. The GSSC meets at least twice annually and regularly reviews performance data to inform oversight and decision-making. The GSSC is supported by the Global Sustainability team, led by the Global Chief Sustainability Officer, who reports to the Chief Corporate Officer who is an ExCo member and Chair of the GSSC. At the management level, the Domtar Sustainability Committee (DSC), a cross-functional group of senior managers and subject-matter experts from across the company, is responsible for implementing the 2030 Sustainability Strategy, overseeing sustainability initiatives, reviewing performance data, and managing environmental impacts, risks and opportunities. The DSC meets quarterly and reports to the GSSC, ensuring environmental issues are monitored and escalated through established governance channels. Independent oversight is further strengthened through the External Sustainability Advisory Committee, which provides external expertise on sustainability-related priorities, risks and emerging trends.

Forests

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

Select all that apply

- ☒ Other, please specify :Global Sustainability Steering Committee

(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
☒ Other policy applicable to the board, please specify :Committee Charter

(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

- | | |
|--|--|
| ☒ Reviewing and guiding annual budgets | ☒ Reviewing and guiding innovation/R&D priorities |
| ☒ Overseeing the setting of corporate targets | ☒ Monitoring the implementation of the business strategy |
| ☒ Monitoring progress towards corporate targets | ☒ Overseeing reporting, audit, and verification processes |
| ☒ Overseeing and guiding value chain engagement | ☒ Overseeing and guiding the development of a business strategy |
| ☒ Approving corporate policies and/or commitments | ☒ 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

Overall responsibility for Domtar's Sustainability Strategy and environmental performance resides with the Global Sustainability Steering Committee (GSSC), to which sustainability oversight has been delegated by the Executive Committee (ExCo). The GSSC is an executive-level governance body composed of ExCo members and other senior leaders, including business unit presidents. It oversees Domtar's sustainability strategy and policy framework, reviews environmental performance metrics and progress against targets, monitors material environmental impacts, risks and opportunities, and supports the integration of sustainability considerations into strategic decision-making and risk management. The GSSC meets at least twice annually and regularly reviews performance data to inform oversight and decision-making. The GSSC is supported by the Global Sustainability team, led by the Global Chief Sustainability Officer, who reports to the Chief Corporate Officer who is an ExCo member and Chair of the GSSC. At the management level, the Domtar Sustainability Committee (DSC), a cross-functional group of senior managers and subject-matter experts from across the company, is responsible for implementing the 2030 Sustainability Strategy, overseeing sustainability initiatives, reviewing performance data, and managing environmental impacts, risks and opportunities. The DSC meets quarterly and reports to the GSSC, ensuring environmental issues are monitored and escalated through established governance channels. Independent oversight is further strengthened through the External Sustainability Advisory Committee, which provides external expertise on sustainability-related priorities, risks and emerging trends.

Water

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

Select all that apply

☒ Other, please specify :Global Sustainability Steering Committee

(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

☒ Other policy applicable to the board, please specify :Committee Charter

(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

- ☒ Reviewing and guiding annual budgets
- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets
- ☒ Overseeing and guiding value chain engagement
- ☒ Approving corporate policies and/or commitments
- ☒ Monitoring compliance with corporate policies and/or commitments
- ☒ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☒ Reviewing and guiding innovation/R&D priorities
- ☒ Overseeing and guiding major capital expenditures
- ☒ Overseeing reporting, audit, and verification processes
- ☒ Overseeing and guiding the development of a business strategy
- ☒ Overseeing and guiding acquisitions, mergers, and divestitures

(4.1.2.7) Please explain

Overall responsibility for Domtar's Sustainability Strategy and environmental performance resides with the Global Sustainability Steering Committee (GSSC), to which sustainability oversight has been delegated by the Executive Committee (ExCo). The GSSC is an executive-level governance body composed of ExCo members and other senior leaders, including business unit presidents. It oversees Domtar's sustainability strategy and policy framework, reviews environmental performance metrics and progress against targets, monitors material environmental impacts, risks and opportunities, and supports the integration of sustainability considerations into strategic decision-making and risk management. The GSSC meets at least twice annually and regularly reviews performance data to inform oversight and decision-making. The GSSC is supported by the Global Sustainability team, led by the Global Chief Sustainability Officer, who reports to the Chief Corporate Officer who is an ExCo member and Chair of the GSSC. At the management level, the Domtar Sustainability Committee (DSC), a cross-functional group of senior managers and subject-matter experts from across the company, is responsible for implementing the 2030 Sustainability Strategy, overseeing sustainability initiatives, reviewing performance data, and managing environmental impacts, risks and opportunities. The DSC meets quarterly and reports to the GSSC, ensuring environmental issues are monitored and escalated through established governance channels. Independent oversight is further strengthened through the External Sustainability Advisory Committee, which provides external expertise on sustainability-related priorities, risks and emerging trends.

Biodiversity

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

Select all that apply

- ☒ Other, please specify :Global Sustainability Steering Committee

(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
- ☒ Other policy applicable to the board, please specify :Committee Charter

(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

- | | |
|--|--|
| ☒ Reviewing and guiding annual budgets | ☒ Reviewing and guiding innovation/R&D priorities |
| ☒ Overseeing the setting of corporate targets | ☒ Overseeing and guiding major capital expenditures |
| ☒ Monitoring progress towards corporate targets | ☒ Overseeing reporting, audit, and verification processes |
| ☒ Overseeing and guiding value chain engagement | ☒ Overseeing and guiding the development of a business strategy |
| ☒ Approving corporate policies and/or commitments | ☒ Overseeing and guiding acquisitions, mergers, and divestitures |
| ☒ 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

Overall responsibility for Domtar's Sustainability Strategy and environmental performance resides with the Global Sustainability Steering Committee (GSSC), to which sustainability oversight has been delegated by the Executive Committee (ExCo). The GSSC is an executive-level governance body composed of ExCo members and other senior leaders, including business unit presidents. It oversees Domtar's sustainability strategy and policy framework, reviews environmental performance metrics and progress against targets, monitors material environmental impacts, risks and opportunities, and supports the integration of sustainability considerations into strategic decision-making and risk management. The GSSC meets at least twice annually and regularly reviews performance data to inform oversight and decision-making. The GSSC is supported by the Global Sustainability team, led by the Global Chief Sustainability Officer, who reports to the Chief Corporate Officer who is an ExCo member and Chair of the GSSC. At the management level, the Domtar Sustainability Committee (DSC), a cross-functional group of senior managers and subject-matter experts from across the company, is responsible for implementing the 2030 Sustainability Strategy, overseeing sustainability initiatives, reviewing performance data, and managing environmental impacts, risks and opportunities. The DSC meets quarterly and reports to the GSSC, ensuring environmental issues are monitored and escalated through established governance channels. Independent oversight is further strengthened through the External Sustainability Advisory Committee, which provides external expertise on sustainability-related priorities, risks and emerging trends.

[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: ☒ Yes
Forests	Select from: ☒ Yes
Water	Select from: ☒ Yes
Biodiversity	Select from: ☒ 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
- ☒ Assessing future trends in 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
- ☒ Managing annual budgets related to environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

- ☒ Other, please specify :Chief Corporate Officer

(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 (CSO) reports directly to the Chief Corporate Officer (CCO), who is the Chair of the Global Sustainability Steering Committee (GSSC) and a member of the Executive Committee (ExCo). The CSO meets with the CCO frequently and meets with the GSSC at least twice annually.

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
- ☒ Assessing future trends in 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

- ☒ Managing annual budgets related to environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing acquisitions, mergers, and divestitures related to environmental issues
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

- ☒ Other, please specify :Chief Corporate Officer

(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 (CSO) reports directly to the Chief Corporate Officer (CCO), who is the Chair of the Global Sustainability Steering Committee (GSSC) and a member of the Executive Committee (ExCo). The CSO meets with the CCO frequently and meets with the GSSC at least twice annually.

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
- ☒ Assessing future trends in 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
- ☒ Managing annual budgets related to environmental issues
- ☒ Implementing the business strategy related to environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing acquisitions, mergers, and divestitures related to environmental issues
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

- ☒ Other, please specify :Chief Corporate Officer

(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 (CSO) reports directly to the Chief Corporate Officer (CCO), who is the Chair of the Global Sustainability Steering Committee (GSSC) and a member of the Executive Committee (ExCo). The CSO meets with the CCO frequently and meets with the GSSC at least twice annually.

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
- ☒ Assessing future trends in 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

- ☒ Managing annual budgets related to environmental issues

- ☒ Implementing the business strategy related to environmental issues
- ☒ Managing environmental reporting, audit, and verification processes
- ☒ Managing acquisitions, mergers, and divestitures related to environmental issues
- ☒ Managing major capital and/or operational expenditures relating to environmental issues
- ☒ Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

- ☒ Other, please specify :Chief Corporate Officer

(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 (CSO) reports directly to the Chief Corporate Officer (CCO), who is the Chair of the Global Sustainability Steering Committee (GSSC) and a member of the Executive Committee (ExCo). The CSO meets with the CCO frequently and meets with the GSSC at least twice annually.
 [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, and we do not 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, and we do not 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, and we do not 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?
	Select from: ☒ 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

Domtar-Environmental-Policy_FINAL-EN-1.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?
	<i>Select from:</i> ☒ 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

Yes

☒ 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, my organization is registered

(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 3

(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 4

(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

Row 5

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

Extended Producer Responsibility (EPR)

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

Select all that apply

☒ Forests

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

Low-impact production and innovation

☒ Circular economy

☒ Extended Producer Responsibility (EPR)

☒ Low environmental impact innovation and R&D

☒ Recycling and recyclability

☒ Sustainable production and consumption

(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

Emerging EPR and packaging regulations, including California SB 54 and related recyclability and compostability requirements, could increase compliance costs, producer responsibility fees, reporting obligations, and packaging-related requirements. These regulations may also influence how fiber-based products are classified within recycling systems and could affect market access and customer expectations. Domtar monitors these developments and engages through industry associations to support effective and science-based implementation.

(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

California's EPR framework is relevant to Domtar's environmental objectives because it influences packaging circularity, recyclability standards, waste reduction, and responsible end-of-life management. It has informed our engagement through industry associations and multi-stakeholder initiatives focused on ensuring that fiber-based products are appropriately recognized within evolving regulatory frameworks. We measure success through increased regulatory clarity, opportunities for stakeholder participation, recognition of fiber-based packaging within recycling systems, and the development of practical, science-based EPR requirements that support circular economy outcomes.

(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 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 :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 2025.

(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 3

(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 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 :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 Industrial Energy Consumers of America (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

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

- ☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

- ☒ ESRS
- ☒ GRI
- ☒ IFRS

(4.12.1.4) Environmental issues covered in publication

Select all that apply

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

(4.12.1.5) Status of the publication

Select from:

- ☒ Complete

(4.12.1.6) Content elements

Select all that apply

- ☒ Strategy
- ☒ Value chain engagement

- ☑ Governance
- ☑ Commodity volumes
- ☑ Risks & Opportunities
- ☑ Water-related targets
- ☑ Water accounting figures
- ☑ Water pollution indicators
- ☑ Greenhouse gas emissions figures
- ☑ Content of environmental policies
- ☑ Deforestation and conversion footprint
- ☑ Forest-related targets
- ☑ Dependencies & Impacts
- ☑ Biodiversity indicators
- ☑ Climate-related targets
- ☑ Deforestation- and conversion-free (DCF) status metrics

(4.12.1.7) Page/section reference

pp. 5-8, 13-58

(4.12.1.8) Attach the relevant publication

Domtar-Sustainability-Report_2025_ENG.pdf

(4.12.1.9) Comment

The information in this report covers Domtar's environmental, social and governance performance for the period of January 1, 2025, to December 31, 2025. This report is Domtar's second sustainability disclosure since Domtar Corporation, Resolute Forest Products and the Paper Excellence Group were integrated under the Domtar brand on October 24, 2024.

[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) 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

Domtar's scenario analysis assumes that climate-related policy, market, technology and physical risk drivers will intensify over time, with impacts varying by jurisdiction, business unit and asset. Key assumptions include continued evolution of carbon pricing, climate disclosure requirements, renewable energy incentives, decarbonization regulations, customer demand for lower-carbon and recyclable products, and ongoing demand for pulp, paper, packaging, tissue and wood products. The analysis considers regional variables such as temperature and precipitation changes, extreme weather, water availability, wildfire exposure, infrastructure resilience, forest productivity and fiber supply. Technology assumptions include continued advancement of commercially viable solutions for energy efficiency, fuel switching, electrification, renewable energy sourcing and other process improvements. Energy assumptions reflect Domtar's current mix of biomass, hydroelectricity, purchased electricity, natural gas and other fuels, with renewable energy supporting resilience while fossil fuel use remains an exposure where alternatives are not yet viable. In lower-warming scenarios, transition drivers such as policy, carbon pricing, customer expectations, disclosure requirements and technology deployment are expected to be more significant. In higher-warming scenarios, physical drivers such as extreme weather, water stress, wildfire risk, forest productivity impacts and infrastructure disruption are expected to become more significant. Key uncertainties include policy consistency, future carbon prices, energy markets, customer demand, technology readiness, capital availability, supplier readiness, and the ability to translate scenario data into site-specific operational and financial impacts. Scenario analysis is not a forecast; it is used to test business resilience under plausible future conditions.

(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 and assessment of plausible future conditions of forests resilience 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

Domtar's forestry-related scenario analysis assumes that climate change may affect forest health, productivity, species distribution and fiber availability over time, with impacts varying by region, forest type and species. The analysis considers drivers such as changing temperature and precipitation patterns, drought, wildfire, pests and disease, and potential migration failure. Domtar uses external climate science and forestry resources, including Natural Resources Canada–Canadian Forest Service's Forest Change program and related tools, to understand forest vulnerability and adaptation needs. Key uncertainties include the pace and regional variability of climate impacts, species sensitivity and adaptive capacity, future disturbance patterns, land-use changes, forest management responses, and the ability to translate regional forest data into site-specific fiber supply implications. Scenario analysis is not a forecast; it is used to assess plausible future conditions and inform resilience planning.

(5.1.1.11) Rationale for choice of scenario

The Canadian Forest Service 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

Domtar's water-related scenario analysis assumes that climate change may affect water availability, quality, flooding, drought, seasonal variability and watershed stress over time, with impacts varying by geography, watershed and facility. The analysis considers drivers such as changes in precipitation patterns, extreme weather, drought and flood frequency, competing water demand, and potential regulatory or community expectations related to water use. Domtar uses external water-risk tools, including WRI Aqueduct, to assess watershed-level exposure to risks such as floods, droughts and water stress using open-source, peer-reviewed data. Key uncertainties include the timing and regional variability of climate impacts, the resolution of watershed-level data, future water demand, regulatory changes, infrastructure resilience, local watershed management practices, and the ability to translate scenario outputs into facility-specific operational and financial impacts.

(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) 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

☒ 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

- ☑ 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

Domtar assessed select pulp, tissue and sawmill assets in the United States and Canada using Willis Towers Watson's Climate Diagnostic model to evaluate potential exposure to future physical climate hazards under Representative Concentration Pathways (RCPs). RCPs provide standardized climate scenarios based on different greenhouse gas concentration pathways and assumptions about future emissions, policy, technology and socio-economic conditions. The analysis assumes that the severity and frequency of physical climate drivers may increase over time, with impacts varying by geography, asset type and scenario. Relevant drivers include changes in temperature and precipitation, extreme weather, flooding, drought, wildfire and water stress. Key uncertainties include climate-model resolution, future emissions pathways, policy and technology developments, local exposure conditions, adaptation measures, infrastructure resilience, and the ability to translate regional projections into asset-specific operational and financial impacts. Scenario analysis is not a forecast; it is used to assess plausible future conditions and inform resilience planning.

(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) 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

Domtar's scenario analysis assumes that climate-related policy, market, technology and physical risk drivers will intensify over time, with impacts varying by jurisdiction, business unit and asset. Key assumptions include continued evolution of carbon pricing, climate disclosure requirements, renewable energy incentives, decarbonization regulations, customer demand for lower-carbon and recyclable products, and ongoing demand for pulp, paper, packaging, tissue and wood products. The analysis considers regional variables such as temperature and precipitation changes, extreme weather, water availability, wildfire exposure, infrastructure resilience, forest productivity and fiber supply. Technology assumptions include continued advancement of commercially viable solutions for energy efficiency, fuel

switching, electrification, renewable energy sourcing and other process improvements. Energy assumptions reflect Domtar's current mix of biomass, hydroelectricity, purchased electricity, natural gas and other fuels, with renewable energy supporting resilience while fossil fuel use remains an exposure where alternatives are not yet viable. In lower-warming scenarios, transition drivers such as policy, carbon pricing, customer expectations, disclosure requirements and technology deployment are expected to be more significant. In higher-warming scenarios, physical drivers such as extreme weather, water stress, wildfire risk, forest productivity impacts and infrastructure disruption are expected to become more significant. Key uncertainties include policy consistency, future carbon prices, energy markets, customer demand, technology readiness, capital availability, supplier readiness, and the ability to translate scenario data into site-specific operational and financial impacts. Scenario analysis is not a forecast; it is used to test business resilience under plausible future conditions.

(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 influence of the scenario analysis on the selected business processes

Domtar's scenario analysis informed risk and opportunity management, strategy and financial planning, business resilience, capacity building, target setting and transition planning. The analysis considered transition scenarios where policy, carbon pricing, customer expectations, disclosure requirements and low-carbon technology deployment become more significant, as well as higher-warming scenarios where physical risks such as extreme weather, drought, flooding, wildfire, water stress and impacts to fiber availability become more significant. Key insights included potential impacts to manufacturing operations, energy use and costs, raw material and fiber availability, water availability, supply chain continuity, customer requirements and market demand for renewable, recyclable and lower-carbon products. These insights supported actions such as inventory management, supplier diversification, production flexibility across the manufacturing network, customer engagement, monitoring of emerging regulations and assessment of decarbonization technologies. The analysis also supported resilience planning by highlighting Domtar's ability to respond through its diversified asset base, renewable energy use, flexible manufacturing network, supplier relationships and ongoing capital planning. It informed capacity building and transition planning by improving internal understanding of climate drivers, emissions hotspots, technology pathways and data needs. Scenario analysis also identified related environmental considerations, including water availability, forest health, biodiversity, fiber supply and ecosystem resilience.

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 influence of the scenario analysis on the selected business processes

Domtar's forest-related scenario analysis helped identify potential risks and opportunities related to forest health, fiber availability, species distribution, ecosystem resilience and long-term wood supply. The analysis considered climate-related drivers such as changes in temperature and precipitation, drought, wildfire, pests and disease, and potential migration failure, with impacts expected to vary by region, forest type and species. Key outcomes included improved understanding of how climate change may affect forest productivity, species sensitivity, adaptive capacity, disturbance patterns and sourcing resilience over the short, medium and long term. These insights informed risk and opportunity assessment, fiber sourcing considerations, forest management discussions, supplier engagement and broader resilience planning. The analysis also highlighted related environmental considerations, including biodiversity, water availability, ecosystem health and land-use

pressures. Key uncertainties include the timing and regional variability of climate impacts, future disturbance patterns, species-level responses, forest management adaptation measures, and the ability to translate regional forest vulnerability data into fiber supply and financial implications.

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 influence of the scenario analysis on the selected business processes

Domtar's water-related scenario analysis helped identify potential risks and opportunities related to water availability, water quality, flooding, drought, watershed stress and operational resilience. The analysis considered climate-related drivers such as changing precipitation patterns, extreme weather, drought and flood frequency, competing water demand, and potential regulatory or community expectations related to water use. Key outcomes included improved understanding of how water-related risks may affect manufacturing operations, infrastructure, permitting, community expectations and surrounding watersheds over the short, medium and long term. These insights informed risk and opportunity assessment, site-level resilience planning, water stewardship considerations, monitoring of emerging water-related risks and broader business continuity planning. The analysis also highlighted links to other environmental issues, including forest health, biodiversity, ecosystem resilience and fiber supply. Key uncertainties include the timing and regional variability of climate impacts, the resolution of watershed-level data, future water demand, local watershed management practices, infrastructure resilience, regulatory changes, and the ability to translate scenario outputs into facility-specific operational and financial implications.

[Fixed row]

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

(5.2.1) Transition plan

Select from:

- ☒ No, but we are developing a climate transition plan within the next two years

(5.2.20) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

- ☒ Other, please specify :We are undertaking foundational transition planning activities, including target development and decarbonization pathway assessments.

(5.2.21) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

Domtar has not yet finalized a formal climate transition plan aligned with a 1.5°C pathway and we are undertaking foundational activities needed to support development of a credible transition plan. These activities include climate scenario analysis, development of science-based Scope 1, 2 and 3 emissions reduction targets, evaluation of emissions reduction pathways and low-carbon technologies, assessment of Scope 3 emissions and supplier engagement, application of internal carbon pricing, and integration of climate considerations into strategic and capital planning processes. The outcomes of this work will inform future transition planning, including identification of decarbonization pathways, implementation timelines, capital requirements, dependencies and performance measures.

[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

- ☒ Physical risks
- ☒ Transition 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

Environmental risks and opportunities have influenced Domtar's product and service strategy by increasing focus on renewable, recyclable, lower-carbon and circular fiber-based solutions. Customer expectations for credible sustainability performance and lower-carbon products continue to shape product development and commercial engagement. In 2025, Domtar received more than 350 customer sustainability data requests, with more than 90% focused in part on forest management, fiber sourcing or carbon, demonstrating that sustainability performance is an increasingly important market expectation. Domtar's innovation strategy also supports product development that delivers environmental and business value, including the launch of Clarion™ phenol-free thermal paper, certified recyclable to Western Michigan University's standard for thermal point-of-sales paper.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

- ☒ Physical risks
- ☒ Transition 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

Environmental risks and opportunities have influenced Domtar's value chain strategy by reinforcing responsible sourcing, supplier engagement, traceability, customer transparency and circularity. In the upstream value chain, risks related to forest health, biodiversity, fiber availability, deforestation regulation and responsible sourcing have supported Domtar's continued focus on certified forest management and fiber sourcing. The report notes that 100% of manufacturing facilities and woodlands operations have chain-of-custody tracking systems, 100% of Domtar-managed woodlands are certified under recognized forest management standards, and Domtar is working with suppliers to collect geolocation data and strengthen supply-chain traceability. Downstream, customer decarbonization and circular economy expectations have influenced Domtar's focus on sustainability data, product transparency and customer engagement.

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
- ☒ Water

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

Environmental opportunities have influenced Domtar's investment in R&D and innovation by supporting the integration of sustainability considerations into product, process and capital decision-making. Domtar's 2030 Sustainability Strategy includes a target to integrate sustainability as a formal criterion in R&D and capital investment decisions by 2026 and to ensure a growing share of innovation-related investments supports sustainability objectives by 2030. In 2025, Domtar reviewed how sustainability is reflected in innovation and capital decision-making processes, including stage-gate processes and innovation-related metrics. Examples include expanded AI modeling at sawmills to improve product quality, optimize wood utilization and reduce waste; waste heat recovery at the Clermont Mill, reducing energy use by 15 million kWh annually; and participation in industry forums on bioeconomy innovation, decarbonization, carbon management and emerging carbon-capture technologies.

Operations

(5.3.1.1) Effect type

Select all that apply

- ☒ Physical risks
- ☒ Transition 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

Environmental risks and opportunities have influenced Domtar's operational strategy by strengthening focus on energy efficiency, renewable energy, emissions reduction, water resilience, environmental management and facility resilience. Domtar's operations use significant renewable energy, with 72% of total energy use from renewable sources in 2025 and 52% of electricity self-generated through cogeneration and hydroelectric facilities. Operational examples include biomass systems that reduce reliance on fossil fuels, wastewater treatment residuals used as biomass fuel, the Nekoosa on-site precipitated calcium carbonate project expected to reduce emissions by approximately 13,000 metric tons of CO₂e annually, and the Marlboro lime kiln fuel transition expected to reduce emissions by 15,000 metric tons of CO₂e annually. Water-related operational strategy has also been influenced by risk and opportunity assessment, including a water reduction capex fund that has supported 24 projects at 10 mills, saving more than 2.3 billion gallons of water annually

[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

- | | |
|---|--|
| ☒ Assets | ☒ Capital allocation |
| ☒ Revenues | ☒ Capital expenditures |
| ☒ Direct costs | ☒ Acquisitions and divestments |
| ☒ Indirect costs | |
| ☒ Access to capital | |

(5.3.2.2) Effect type

Select all that apply

- ☒ Physical risks
- ☒ Transition 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

Environmental risks and opportunities have influenced Domtar's financial planning through capital allocation, carbon-cost forecasting, emissions-reduction planning, water resilience investments, R&D and value-chain initiatives. Domtar's 2030 Sustainability Strategy, informed by its impacts, risks and opportunities assessment, includes objectives related to sustainable forest management and fiber sourcing, biodiversity, decarbonization and water resilience. Domtar forecasts, budgets and

manages carbon-related costs and emissions in jurisdictions with carbon-pricing programs and has developed an internal price on carbon to inform project planning and future capital allocation. Domtar is also developing emissions-reduction scenarios and roadmaps to support Scope 1 and 2 reductions and plans to establish a science-based Scope 1, 2 and 3 GHG emissions reduction target by December 2026. Financial planning is also influenced by renewable energy generation, renewable energy certificates, lower-carbon technology assessment and water-related capital planning. In 2025, Domtar reported 72% renewable energy use and 52% self-generated electricity. Domtar’s water reduction capex fund has supported 24 projects at 10 mills, saving more than 2.3 billion gallons, or 8.7 million cubic meters, of water annually. Domtar also invested US\$276 million in facility resilience and US\$114 million in R&D in 2025.

[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: ☒ 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)

315

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

55

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

1

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

1

(5.9.5) Please explain

Water-related CAPEX increased by 315% in 2025, from \$7.4 million to \$30.7 million. The increase was primarily at our Kingsport location where CAPEX increased by \$22.3 million to construct a new two-stage anaerobic-aerobic wastewater treatment system. For the forthcoming reporting year, water-related CAPEX is estimated to increase due to finishing construction of the new wastewater treatment system at our Kingsport mill. Actual expenditure may vary due to project approval and implementation schedules, water-risk assessments, priority-site evaluations, permit requirements and unplanned infrastructure needs. Water-related OPEX decreased by 1.0% in 2025, from \$90.3 million to \$89.4 million. For the forthcoming reporting year, OPEX is expected to remain stable or slightly decrease reflecting ongoing treatment, monitoring, maintenance and compliance requirements.

[Fixed row]

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

	Use of internal pricing for this environmental externality
Carbon	Select from: ☒ Yes
Water	Select from: ☒ Yes
Other	Select from: ☒ No, and we do not plan to in the next two years

[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 of carbon is the regulatory price of carbon that each operation is subject to according to the relevant provincial regulations in Canada. In the province of British Columbia, our model and forecast is based on the carbon price as published by the regulator, and also considers potential cost savings through compliance opportunities including purchasing carbon credits or our own use of emission performance credits. 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 2025 between CAD \$36.05 to \$41.54. The annual projected prices are based on the ongoing settlement prices of the WCI Cap-and-Trade auctions and future projected prices based on third-party forecasts up to 2030. Our operations in Saskatchewan and Ontario are currently not subject to an internal price of carbon since our operations are currently not subject to a carbon price (regulations are paused or not applicable, respectively).

(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 of carbon is spatially differentiated based on the province where the operation is located. Province-specific carbon price forecasts are developed to take into consideration the unique regulations in each jurisdiction.

(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

Our operations in BC anticipate a "headline" carbon price increase of \$15/tonne per year. For our Quebec operations, we generally expect an increase over time, but since the price is determined through quarterly auctions, we use one or multiple proprietary forecasts to inform our long-term views.

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

28.63

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

68.62

(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

27

(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 Executive Committee (ExCo), 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]

(5.10.2) Provide details of your organization's internal price on water.

Row 1

(5.10.2.1) Type of pricing scheme

Select from:

- ☒ Implicit price

(5.10.2.2) Objectives for implementing internal price

Select all that apply

- | | |
|--|--|
| ☒ Navigate regulations | ☒ Influence strategy and/or financial planning |
| ☒ Drive water efficiency | ☒ Identify and seize low-water impact opportunities |
| ☒ Stress test investments | ☒ Setting and/or achieving of water-related policies and targets |
| ☒ Conduct cost-benefit analysis | ☒ Incentivize consideration of water-related issues in decision making |
| ☒ Drive water-related investment | ☒ Incentivize consideration of water-related issues in risk assessment |

(5.10.2.3) Factors beyond current market price are considered in the price

Select from:

- ☒ No

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

Due to the diversity of Domtar's operations across multiple regions in Canada and the United States, water-related costs and pricing considerations are evaluated at the facility level. For sites that purchase water, the cost reflects local supplier rates. For sites that withdraw water directly, costs associated with water extraction, treatment, distribution within the facility, and wastewater treatment are tracked and evaluated against water volumes managed. This information is regularly monitored through operational and environmental management processes and is used to support investment decisions, identify water efficiency opportunities, inform risk assessments, evaluate compliance obligations, and support the achievement of water-related objectives and targets.

[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	<i>Select from:</i> ☒ Yes	<i>Select all that apply</i> ☒ Climate change ☒ Forests
Smallholders	<i>Select from:</i> ☒ Yes	☐
Customers	<i>Select from:</i> ☒ Yes	<i>Select all that apply</i> ☒ Climate change ☒ Forests ☒ Water
Investors and shareholders	<i>Select from:</i> ☒ Yes	<i>Select all that apply</i> ☒ Climate change ☒ Forests
Other value chain stakeholders	<i>Select from:</i> ☒ Yes	<i>Select all that apply</i> ☒ Climate change ☒ Forests ☒ 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

We use FSC Controlled Wood National Risk Assessments to identify suppliers with potentially substantive environmental impacts. Suppliers sourcing fiber from areas designated as "specified risk" for indicators such as biodiversity conservation, High Conservation Values, forest conversion, or ecosystem integrity are considered substantive. The threshold is the FSC risk classification itself, with suppliers in specified-risk areas subject to enhanced due diligence and risk mitigation requirements.

(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

10
[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 assess the emissions in our supply chain and to ensure the raw materials we source comply with product regulatory and safety requirements. Our goal is to improve the environmental profile of the raw materials we purchase through to our manufacturing processes and the transport of our products to our customers. Examples of engagement initiatives include: - Providing financial and technical support to help small, private landowners certify their forests to recognized sustainable forest management standards, which include climate and carbon-related requirements and considerations. - Collecting data and information on chemicals and raw materials to assess carbon footprints and ensure these products 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. As an example, in the United States we collaborate with the Four States Timberland Owners Association (FSTOA), whose members hail from Arkansas, Texas, Louisiana and Oklahoma and which has held FSC® certification since 2012, marking more than 12 years of the program's operation. With support from our Ashdown pulp mill in Arkansas, the FSTOA has enrolled over 200,000 hectares (500,000 acres) of privately owned forestland in FSC certification programs, enhancing forest health, biodiversity and long-term sustainability.
[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 climate-related criteria as part of our purchasing process. However, we actively engage with suppliers on key environmental topics, including carbon footprints, 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. 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

☒ On-site third-party audit

☒ Grievance mechanism/ Whistleblowing hotline

- ☒ 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. Certification requires that 100% of the fiber we source and process meet minimum due diligence requirements related to risks of illegal logging and other important sustainability issues. This enables us to confirm to our customers that we have avoided timber and timber products from unacceptable sources in our supply chain. Depending on the tracking system, additional supplier requirements may apply that relate to high conservation values, conversion of forests to non-forest uses, propagation or use of genetically modified trees, corruption, indigenous rights and/or workers' rights. These requirements are verified regularly through independent, third-party audits.
[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

(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

[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 indicators
- ☒ Support smallholders to measure and report on environmental and social indicators
- ☒ Support smallholders to clarify and secure land tenure rights
- ☒ Support smallholders to adhere to standards in upstream value chain
- ☒ Support smallholders to adopt best practices which protect biodiversity

- ☑ 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 2025.

[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
- ☒ 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:

- ☒ 100%

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

In 2025, engagement with customers was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the climate-related objectives and targets we identified as part of the plan. 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. Our climate commitments include objectives and targets laid out in our 2030 Sustainability Strategy, launched May, 6, 2025. 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
- ☒ 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%

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

In 2025, engagement with customers was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the forest-related objectives and targets we identified as part of the plan. Customers are a critical stakeholder group for Domtar in shaping and advancing our forest management and

fiber sourcing goals. In 2025, forests remained the number one issue our customers requested sustainability information for. Their expectations for transparency, responsible forest management and fiber sourcing and certified products directly influence our operational practices and long-term competitiveness. As responsible 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. Our forest commitments include objectives and targets laid out in our 2030 Sustainability Strategy, launched May, 6, 2025.

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 about your products and relevant certification schemes

☒ 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

In 2025, engagement with customers was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the water-related objectives and targets we identified as part of the plan. 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. Our water commitments include objectives and targets laid out in our 2030 Sustainability Strategy, launched May, 6, 2025.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

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

(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

In 2025, engagement with a wide range of stakeholder groups was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the climate-related objectives and targets we identified as part of the plan. 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. Between 2024-2025, we consulted 485 individual stakeholders as part of our materiality assessment. This engagement was particularly important for defining 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. Our climate commitments include objectives and targets laid out in our 2030 Sustainability Strategy, launched May, 6, 2025. 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

In 2025, engagement with a wide range of stakeholders was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the forest-related objectives and targets we identified as part of the plan. 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. Between 2024-2025, we consulted 485 individual stakeholders as part of our materiality assessment. This engagement was particularly important for defining 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. Our forest commitments include objectives and targets laid out in our 2030 Sustainability Strategy, launched May, 6, 2025. 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 :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

☒ 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

In 2025, engagement with a wide range of stakeholders was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the water-related objectives and targets we identified as part of the plan. 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. Between 2024-2025, we consulted 485 individual stakeholders as part of our materiality assessment. This engagement was particularly important for defining 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. Our water commitments include objectives and targets laid out in our 2030 Sustainability Strategy, launched May, 6, 2025. 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 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

In 2025, engagement with NGOs was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the climate-related objectives and targets we identified as part of the plan. 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. Our climate commitments include objectives and targets laid out in our 2030 Sustainability Strategy, launched May, 6, 2025. 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

In 2025, engagement with NGOs was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the forest-related objectives and targets we identified as part of the plan. 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

In 2025, engagement with NGOs was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the water-related objectives and targets we identified as part of the plan. 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. Our water commitments include objectives and targets laid out in our 2030 Sustainability Strategy, launched May, 6, 2025. 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.

Forests

(5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

(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

(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

In 2025, engagement with investors was vital to finalizing and launching our 2030 Sustainability Strategy on May 6, including determining the forest-related objectives and targets we identified as part of the plan. Domtar engages investors, lenders and shareholders on forest-related topics to demonstrate how responsible forest management, sustainable fiber sourcing and environmental stewardship support the long-term resilience and value of the business. While Domtar is privately owned by a single beneficial owner and does not have public shareholders, we maintain relationships with financial institutions and capital providers that support investments in our manufacturing assets, operational improvements and long-term business growth. Engagement on forest-related issues helps ensure that financial stakeholders understand the measures we take to mitigate risks associated with deforestation, forest degradation, biodiversity loss, climate change and evolving regulatory and market expectations. Transparent disclosure of our policies, goals, certification programs and landscape-level initiatives provides confidence that forest-related risks are being appropriately identified, managed and monitored throughout our operations and supply chain. We also communicate our progress toward sustainability objectives, including responsible sourcing, forest certification, biodiversity conservation, climate action and stakeholder engagement. By sharing information on these programs and investments, we demonstrate how sustainable forest management contributes to securing long-term fiber supply, maintaining operational continuity, protecting ecosystem services and supporting the communities where we operate. Investor and capital provider engagement further creates opportunities for dialogue on emerging sustainability expectations and best practices. Feedback received through these interactions helps inform our continuous improvement efforts and

supports alignment between our environmental priorities and long-term business strategy. Overall, engagement with investors, lenders and other financial stakeholders enables Domtar to communicate the business rationale for sustainable forest management, demonstrate effective risk management, and reinforce the role that forest stewardship plays in maintaining the long-term viability and competitiveness of the company.

(5.11.9.6) Effect of engagement and measures of success

The effectiveness of Domtar's engagement with investors, lenders and other capital providers is reflected in continued confidence in the company's long-term forest stewardship strategy and support for investments that strengthen the sustainability and resilience of our operations. Through transparent disclosure of our forest-related policies, goals, certification programs and landscape-level initiatives, financial stakeholders gain a clearer understanding of how forest-related risks and opportunities are managed across the business. Measures of success include maintaining access to capital for strategic investments, positive stakeholder feedback on the quality and transparency of our sustainability disclosures, and continued support for projects that enhance operational efficiency, responsible sourcing, biodiversity conservation and climate resilience. These discussions provide valuable insight into evolving market expectations and emerging sustainability priorities, enabling Domtar to continuously improve its forest-related programs and disclosures. As a privately owned company with a single beneficial owner, the primary outcome of engagement is strengthened alignment between long-term business objectives, forest stewardship commitments and investment decisions, helping ensure that sustainability considerations are integrated into capital planning and long-term value creation.

[Add 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 does not report on plastics in our 2026 CDP questionnaire as the company deems the use of and exposure to plastics in our direct operations and value chain as low-risk relative to other commodities used in our business. The vast majority of our products are derived from renewable and biodegradable wood fiber using energy and water in our manufacturing processes. As part of our product lines, 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?
	Select all that apply ☒ No

[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 boundary

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

Domtar acquired Iconex Paper in November 2024 but had not included the business unit into the consolidated GHG Inventory until the 2025 reporting year, due to the timing of the acquisition and availability of data. Iconex Paper converts thermal paper parent rolls into point-of-sale (POS) receipt rolls in three converting facilities. The additional emissions from the three added facilities represent <0.01% of scope 1 emissions and <0.2% of scope 2 (location-based) emissions.
[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?

(7.1.3.1) Base year recalculation

Select from:

☒ No, because the impact does not meet our significance threshold

(7.1.3.4) Base year emissions recalculation policy, including significance threshold

Domtar will recalculate its base year greenhouse gas (GHG) emissions inventory when significant changes occur that affect the comparability of emissions data over time, in accordance with guidance provided by The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition). Recalculation may be triggered by: (1) structural changes to the organization or GHG inventory boundary, such as acquisitions, divestitures, mergers, or changes in ownership or operational control; (2) material changes in methodologies, emission factors, data sources, or calculation approaches identified through annual inventory reviews; or (3) the discovery of significant errors, or the cumulative impact of multiple errors, that materially affect reported emissions. Domtar's significance threshold for recalculating the base year is a change greater than 5% in total Scope 1 and Scope 2 emissions. When this threshold is exceeded, Domtar will restate its base year emissions and update historical emissions data as appropriate. Domtar may also elect to recalculate and restate its base year for changes below the 5% threshold if doing so improves the accuracy, completeness, or consistency of its emissions reporting.

(7.1.3.5) Past years' recalculation

Select from:

☒ 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 excluded from your disclosure of climate-related data?

Select from:

☒ Yes

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

Row 1

(7.4.1.1) Source of excluded emissions

Fugitive emissions from 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 are not relevant

(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents

0

(7.4.1.10) Explain why this source is excluded

This source is de minimus in the Scope 1 GHG Inventory.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

The estimation is based on previous years' GHG emissions quantifications that included the source.

[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)

109202

(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)

(7.6.3) Methodological details

This disclosure represents Domtar's consolidated emissions across operations in North America. 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)

2771303

(7.6.2) End date

12/31/2024

(7.6.3) Methodological details

This disclosure represents Domtar's consolidated emissions across operations in North America. 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.

[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)

1215579

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

(7.7.4) Methodological details

This disclosure represents Domtar's consolidated emissions across operations in North America. 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)

1396975

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

1506496

(7.7.3) End date

12/31/2024

(7.7.4) Methodological details

This disclosure represents Domtar's consolidated emissions across operations in North America. 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).

[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)

2385140

(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

(7.8.6) 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. For integrated processes, onsite fiber processing at owned sawmill/chip mills is excluded from this category (although their upstream emissions are included), to avoid double-counting of emissions in the overall GHG Emissions inventory. The cradle-to-gate emissions of externally purchased fiber is included in this category. Emission factors sources include 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. Based on the cut-off per the Scope 3 Standard, emissions were assigned to purchased recycled fibers to account for recycling and processing of recovered fiber, while excluding upstream emissions from its previous life cycle. *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)

86538

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

80

(7.8.6) 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)

995887

(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

(7.8.6) 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)

455079

(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

(7.8.6) 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 transportation of major by-products between integrated sites, is included in this category. Distance-based factors capture total transport chain emissions, including the vehicle's return trip. Well-to-wheel emission factors are sourced from the Global Logistics Emissions Council (GLEC). Transportation modes include fiber transported in trucks, rail, ship and barge/tugboat. For chemical transportation, key data were collected from major suppliers prior to the integration of the legacy companies, representing less than 5% of total 2025 chemical consumption. These data were extrapolated to estimate transportation emissions for 100% of major purchased chemicals in 2025.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) Please explain

Waste generated in operations accounted for less than 1% of total Scope 3 emissions in both 2023 and 2024 and was therefore excluded from the 2025 inventory recalculation.

Business travel

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) Please explain

Business travel emissions accounted for less than 1% of total Scope 3 emissions in both 2023 and 2024 and was therefore excluded from the 2025 inventory recalculation.

Employee commuting

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) Please explain

Employee commuting accounted for less than 1% of total Scope 3 emissions in both 2023 and 2024 and was therefore excluded from the 2025 inventory recalculation.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☒ Not evaluated

(7.8.6) 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)

669453

(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

(7.8.6) Please explain

Shipments of final sold products are coming from Domtar Business Systems, with information on products shipped from all operating sites to customers. This category also captures the transportation of sold by-products from our wood product facilities. Distance travelled, tonnage of product transported, and transportation mode determine the emissions associated with each leg of transport. Well-to-wheel emission factors are sourced from the Global Logistics Emissions Council (GLEC). Distance-based factors capture total transport chain emissions, including the vehicle's return trip.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

3544725

(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

(7.8.6) Please explain

*Quantities of final sold products are sourced from the Domtar Business System and include both main products and by-products. For main products, product-specific downstream processing and end-of-life emission factors and calculation methodologies are adapted from the NCASI Scope 3 Screening Tool and the EPA GHG Emission Factors Hub, with consideration given to disposal practices in regions where customers are located. For integrated processes, downstream processing of by-products transferred between owned wood products and pulp, paper, tissue, or packaging facilities is excluded from the corporate Scope 3 inventory to avoid double-counting emissions already captured in Scope 1 and 2. In this case, end-of-life emissions are only included for products from pulp, paper, tissue, and packaging facilities. For wood product facilities selling by-products to external customers, final converted products were identified where possible, and the associated downstream processing and end-of-life factors were applied to estimate emissions. A 20% safety factor was applied to account for uncertainty in 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) 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)

3458505

(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

(7.8.6) Please explain

Quantities of final sold products are sourced from the Domtar Business System and include both main products and by-products. For main products, product-specific downstream processing and end-of-life emission factors and calculation methodologies are adapted from the NCASI Scope 3 Screening Tool and the EPA GHG Emission Factors Hub, with consideration given to disposal practices in regions where customers are located. For integrated processes, downstream processing of by-products transferred between owned wood products and pulp, paper, tissue, or packaging facilities is excluded from the corporate Scope 3 inventory to avoid double-counting emissions already captured in Scope 1 and 2. In this case, end-of-life emissions are only included for products from pulp, paper, tissue, and packaging facilities. For wood product facilities selling by-products to external customers, final converted products were identified where possible, and the associated downstream processing and end-of-life factors were applied to estimate emissions. A 20% safety factor was applied to account for uncertainty in 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

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

Not relevant, as Domtar does not own or operate franchises.

Investments

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) Please explain

Emissions from investments accounted for less than 1% of total Scope 3 emissions in both 2023 and 2024 and was therefore excluded from the 2025 inventory recalculation.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization’s activities

(7.8.6) Please explain

Not relevant to Domtar.

Other (downstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization’s activities

(7.8.6) 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

12/31/2024

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

2121235

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

86378

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

992885

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

391838

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

0

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

0

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

0

(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)

737580

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

3633182

(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)

3411207

(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)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

(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. Categories 5 (Waste generated in operations), 6 (Business Travel), 7 (Employee Commuting) and 15 (Investments) were quantified but have been removed from the inventory to facilitate year-over-year comparison. Included categories contribute to over 99% of Domtar's overall Scope-3 emissions.
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from: ☒ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: ☒ No third-party verification or assurance
Scope 3	Select from: ☒ 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

VERREPRT_Alma_2025_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 all that apply

☒ ISO14064-3

(7.9.1.7) Proportion of reported emissions verified (%)

27

[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:

☒ Decreased

(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)

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

Domtar divested one sawmill in 2025, and the change in emissions in the overall inventory is negligible as the mill was not in operation during the prior reporting year.

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)

46200

(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 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)

71705

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(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 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 mergers since the prior year comparison includes merged companies.

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO2e)

17798

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

(7.10.1.3) Emissions value (percentage)

0

(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)

16027

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

0

(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)

35287

(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 reasons not listed above.

[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

(7.12) Does your organization have significant land sector activities in its operations or value chain?

	Agriculture, forestry or other land sector activities	Indicate if these activities are only related to forest lands and/or non-productive, non-forest lands	Specify the reason for no significant activities
	<i>Select from:</i> ☒ Yes, in both our direct operations and our upstream/downstream value chain	<i>Select from:</i> ☒ Yes, these activities are only related to forest lands and/or non-productive, non-forest lands	<i>Select from:</i> ☒ No relevant activities related to agricultural lands identified

[Fixed row]

(7.12.3) Account for biogenic carbon data pertaining to your direct operations and identify any exclusions.

CO2 emissions from land use management

(7.12.3.3) Please explain

Domtar is not currently able to report this value.

CO2 removals from land use management

(7.12.3.3) Please explain

Domtar is not currently able to report this value.

Sequestration during land use change

(7.12.3.3) Please explain

Domtar is not currently able to report this value.

CO2 emissions from biofuel combustion (land machinery)

(7.12.3.3) Please explain

Domtar is not currently able to report this value.

CO2 emissions from biofuel combustion (processing/manufacturing machinery)

(7.12.3.1) Emissions (metric tons CO2)

13448447

(7.12.3.2) Methodology

Select all that apply

☒ Region-specific emissions factors

(7.12.3.3) 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)

(7.12.3.3) Please explain

Not applicable.
[Fixed row]

(7.13) Does your organization choose to account for and report technological CO2 removals or captured CO2 with geologic storage, or have you done so in previous years?

	Technological CO2 removals or captured CO2 with geologic storage in the reporting year	Specify the reason for no technological CO2 removals or captured CO2 with geological storage in the reporting year	Technological CO2 removals or captured CO2 with geologic storage were accounted for and reported in previous years
	Select from: ☒ No, explanation provided	Select from: ☒ No relevant activities identified	Select from: ☒ No

[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:
☒ No, but we intend to calculate this data within the next two years

(7.14.7) Explain why you do not calculate GHG emissions for this commodity

Following the publication of the GHG Protocol Land Sector and Removals Standard in January 2026, which excluded explicit guidance for forestry, we are in the process of developing our approach to calculate land sector emissions and removals.

[Fixed row]

(7.15) Does your organization break down its Scope 1 and/or Scope 2 emissions by greenhouse gas type?

(7.15.1) Emissions breakdown by greenhouse gas type

Select from:

☒ Yes, Scope 1 emissions only

[Fixed row]

(7.15.1) Break down your total gross global Scope 1 and Scope 2 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 selected gas)

2474401

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

2474401

(7.15.1.8) 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 selected gas)

1278

(7.15.1.3) Scope 1 emissions (metric tons of CO₂e)

35782

(7.15.1.8) 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 selected gas)

296

(7.15.1.3) Scope 1 emissions (metric tons of CO₂e)

(7.15.1.8) 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	931511	293177	290995
United States of America	1920063	922403	1107617

*[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	43646
Row 2	Pulp and Tissue	897794
Row 3	Paper and Packaging	1910134

[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:

☒ No

(7.18.3) Why do you not include greenhouse gas emissions pertaining your business activity(ies) in your direct operations as part of your global gross Scope 1 figure? Describe any plans to do so in the future.

(7.18.3.1) Primary reason

Select from:

☒ We are planning to include in the next two years

(7.18.3.2) Please explain

Domtar has been following developments in the GHG Protocol's Land Sector and Removals Standard (LSRS) over the past several years, and chose not to pursue the quantification of land-based emissions in advance of the publication of this document.

[Fixed 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	17952	18890
Row 2	Pulp and Tissue	605548	608896
Row 3	Paper and Packaging	592079	770827

[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)

2851574

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

1215579

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

(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**(7.22.4) 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 one or multiple grades of primary product, plus co-products and/or electricity. Some paper mills produce numerous different paper products (grade, finish, basis weight, etc.) even within the same day. Domtar currently does not have the capability to assign greenhouse gas emissions down to the product SKU level. Our current practice is to divide total facility-level GHG emissions by the total mass of salable product to generate a scope 1 and/or scope 2 GHG intensity factor. We can use this approach to estimate a gate-to-gate emission factor for a product. Further, Domtar has and continues to work with customers on a case-by-case basis to help customers complete a Life Cycle Analysis by providing high-quality primary data or support Product Carbon Footprint data according to a customer's specific methodology 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 salable product). While our corporate-wide Scope 3 data quality is improving yearly, 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. We continue to monitor the fast-moving landscape of software and AI-based solutions for Product Carbon Footprint solutions and engage directly with our customers, to ensure that we are working to provide decision-useful data to our customers in a cost-effective and time-effective manner for our team.

[Fixed row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☒ More than 5% but less than or equal to 10%

(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: ☒ Yes
Consumption of purchased or acquired electricity	Select from: ☒ Yes
Consumption of purchased or acquired heat	Select from: ☒ No
Consumption of purchased or acquired steam	Select from: ☒ Yes
Consumption of purchased or acquired cooling	Select from: ☒ No
Generation of electricity, heat, steam, or cooling	Select from: ☒ 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

41222090

(7.30.1.3) MWh from non-renewable sources

13413071

(7.30.1.5) Total (renewable + non-renewable) MWh

54635161.00

Consumption of purchased or acquired electricity

(7.30.1.2) MWh from renewable sources

4570050

(7.30.1.3) MWh from non-renewable sources

1774626

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

6344676.00

Consumption of purchased or acquired steam

(7.30.1.2) MWh from renewable sources

334779

(7.30.1.3) MWh from non-renewable sources

54499

(7.30.1.5) Total (renewable + non-renewable) MWh

389278.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.2) MWh from renewable sources

905878

(7.30.1.5) Total (renewable + non-renewable) MWh

905878.00

Total energy consumption

(7.30.1.2) MWh from renewable sources

47032797

(7.30.1.3) MWh from non-renewable sources

15230849

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

62263646.00

[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: ☒ Yes
Consumption of fuel for the generation of heat	Select from: ☒ Yes
Consumption of fuel for the generation of steam	Select from: ☒ Yes
Consumption of fuel for the generation of cooling	Select from: ☒ No
Consumption of fuel for co-generation or tri-generation	Select from: ☒ 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) Total fuel MWh consumed by the organization

41556868

(7.30.7.2) MWh fuel consumed for self-generation of electricity

530331

(7.30.7.3) MWh fuel consumed for self-generation of heat

483489

(7.30.7.4) MWh fuel consumed for self-generation of steam

6482938

(7.30.7.6) MWh fuel consumed for self- cogeneration or self-trigeneration

34060111

(7.30.7.7) 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) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

(7.30.7.6) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.7) Comment

No unsustainable biomass is used.

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

(7.30.7.6) MWh fuel consumed for self- cogeneration or self-trigeneration

0

(7.30.7.7) Comment

No other renewable fuels are used.

Coal

(7.30.7.1) Total fuel MWh consumed by the organization

439850

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.4) MWh fuel consumed for self-generation of steam

0

(7.30.7.6) MWh fuel consumed for self- cogeneration or self-trigeneration

439850

(7.30.7.7) Comment

Coal continues to be used at only one facility.

Oil

(7.30.7.1) Total fuel MWh consumed by the organization

419576

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

208909

(7.30.7.4) MWh fuel consumed for self-generation of steam

16822

(7.30.7.6) MWh fuel consumed for self- cogeneration or self-trigeneration

193844

(7.30.7.7) Comment

Oil includes light fuel oil, fuel oils #2, #5 and #6, Bunker C, and used/waste oil.

Gas

(7.30.7.1) Total fuel MWh consumed by the organization

12015206

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

1833587

(7.30.7.4) MWh fuel consumed for self-generation of steam

3030894

(7.30.7.6) MWh fuel consumed for self- cogeneration or self-trigeneration

7150726

(7.30.7.7) Comment

Gas includes natural gas and propane.

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

203660

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

42404

(7.30.7.4) MWh fuel consumed for self-generation of steam

8472

(7.30.7.6) MWh fuel consumed for self- cogeneration or self-trigeneration

152785

(7.30.7.7) 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) Total fuel MWh consumed by the organization

54635160

(7.30.7.2) MWh fuel consumed for self-generation of electricity

530331

(7.30.7.3) MWh fuel consumed for self-generation of heat

2568388

(7.30.7.4) MWh fuel consumed for self-generation of steam

9539125

(7.30.7.6) MWh fuel consumed for self- cogeneration or self-trigeneration

41997316

(7.30.7.7) Comment

Sum of each column.

[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)

5174840

(7.30.9.2) Generation that is consumed by the organization (MWh)

6743966

(7.30.9.3) Gross generation from renewable sources (MWh)

4165963

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

2816339

Heat

(7.30.9.1) Total Gross generation (MWh)

2568388

(7.30.9.2) Generation that is consumed by the organization (MWh)

2568388

(7.30.9.3) Gross generation from renewable sources (MWh)

483489

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

483489

Steam

(7.30.9.1) Total Gross generation (MWh)

52456050

(7.30.9.2) Generation that is consumed by the organization (MWh)

52444703

(7.30.9.3) Gross generation from renewable sources (MWh)

41073380

(7.30.9.4) Generation from renewable sources that is consumed by the organization (MWh)

41073380

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 a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Canada

(7.30.14.1) Consumption of purchased electricity (MWh)

4092414

(7.30.14.2) Consumption of self-generated electricity (MWh)

2060883

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

24154235

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

30307532.00

United States of America

(7.30.14.1) Consumption of purchased electricity (MWh)

2252263

(7.30.14.2) Consumption of self-generated electricity (MWh)

2208079

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

389278

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

30858856

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

35708476.00

[Fixed row]

(7.30.15) Provide details on the electricity purchases that were accounted for at a zero or near-zero emission factor in the reporting year.

Row 1

(7.30.15.1) Country/area of electricity consumption

Select from:

☒ Canada

(7.30.15.2) Sourcing method

Select from:

☒ Default delivered electricity from the grid (e.g. standard product offering by an energy supplier), supported by energy attribute certificates

(7.30.15.5) Low-carbon electricity consumed via selected sourcing method in the reporting year (MWh)

3599060

(7.30.15.6) Energy attribute certificate (EAC) tracking system used

Select from:

☒ No EACs redeemed, retired, or cancelled by your organization or on its behalf

(7.30.15.14) Comment

*The sum of purchased electricity at facilities located in the provinces of British Columbia and Quebec, whose grids are supplied by >98% hydropower generation.
[Add row]*

(7.30.17) Provide details of your organization's low-carbon heat, steam, and cooling purchases in the reporting year by country/area.

Row 1

(7.30.17.1) Sourcing method

Select from:

☒ Heat/steam/cooling supply agreement

(7.30.17.2) Country/area of consumption of low-carbon heat, steam or cooling

Select from:

☒ United States of America

(7.30.17.3) Energy carrier

Select from:

☒ Steam

(7.30.17.4) Low-carbon technology type

Select from:

☒ Sustainable biomass

(7.30.17.5) Low-carbon heat, steam, or cooling consumed (MWh)

334779

(7.30.17.6) Comment

One facility purchases steam from an adjacent wood products facility, whose generation sources are majority sustainable biomass. The % renewable composition of the steam is calculated monthly and is reported to Domtar on an annualized basis.

[Add 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

0.000575828

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

4250187

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

7381000000

(7.45.5) Scope 2 figure used

Select from:

☒ Market-based

(7.45.6) % change from previous year

3

(7.45.7) Direction of change

Select from:

☒ Increased

(7.45.8) Reasons for change

Select all that apply

☒ Change in revenue

(7.45.9) Please explain

The year-over-year change is relatively minor, and reflects a slight increase in total emissions (numerator) and a slight decrease in global revenue (denominator).
[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:

☒ Energy usage

(7.52.2) Metric value

76

(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

(7.52.6) Direction of change

Select from:

☒ No change

(7.52.7) Please explain

The proportion of renewable fuel usage was stable between 2024 and 2025.

Row 2

(7.52.1) Description

Select from:

☒ Energy usage

(7.52.2) Metric value

76

(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

(7.52.6) Direction of change

Select from:

☒ No change

(7.52.7) Please explain

The proportion of renewable energy usage was stable between 2024 and 2025.

Row 3

(7.52.1) Description

Select from:
☒ Energy usage

(7.52.2) Metric value

4269

(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

16

(7.52.6) Direction of change

Select from:
☒ Increased

(7.52.7) Please explain

Significant cogeneration came online in 2025 relative to 2024 at three mills: St. Félicien, Coosa Pines and Johnsonburg. This is the result of the completion of major projects.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☒ No target

(7.53.3) Explain why you did not have an emissions target, and forecast how your emissions will change over the next five years.

(7.53.3.1) Primary reason for no emissions target

Select from:

☒ We are planning to introduce a target in the next two years

(7.53.3.2) Anticipated direction of change in scope 1 emissions

Select from:

☒ Decrease

(7.53.3.4) Anticipated direction of change in scope 2 emissions

Select from:

☒ Decrease

(7.53.3.6) Anticipated direction of change in scope 3 emissions

Select from:

☒ Unknown

(7.53.3.8) Please explain

Domtar is currently in the process of setting a science-aligned GHG emission reduction target for Scopes 1, 2 and 3. In the next five years we expect our GHG emissions to decrease, although the extent to which they will decrease will be determined following our target-setting process. Domtar's GHG target-setting process will build on the GHG emission reduction progress of its legacy companies. Resolute Forest Products was an early adopter of SBTi in 2015, and by 2023 had reduced Scope 1 & 2 emissions by 52% from their 2015 base year. Meanwhile, by 2023, legacy Domtar's pulp, paper and packaging mills had reduced absolute Scope 1 and 2 (market-based) greenhouse gas emissions 28% since 2010. Domtar Corporation is now taking the opportunity to define a corporate-wide GHG emission reduction

target that builds on best practices from legacy companies while considering decarbonization opportunities, novel technologies, current market conditions, and emerging opportunities. Domtar is conducting a scenario-based assessment to evaluate decarbonization pathways to allow the development of an informed and practical science-aligned emission reduction target.

[Fixed row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☒ Other climate-related targets

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:

☒ Oth 1

(7.54.2.2) Date target was set

05/06/2025

(7.54.2.3) Target coverage

Select from:

☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:

☒ Absolute

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Other

☒ Other metric, please specify :Advance the development of our Scope 3 greenhouse gas (GHG) emissions inventory

(7.54.2.7) End date of base year

12/31/2025

(7.54.2.9) End date of target

12/31/2026

(7.54.2.13) Target status in reporting year

Select from:

☒ New

(7.54.2.15) Is this target part of an emissions target?

Improving data quality, methodological rigor, and completing timing of our Scope 3 inventory will support meaningful Scope 3 target-setting.

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

☒ No, it's not part of an overarching initiative

Row 2

(7.54.2.1) Target reference number

Select from:

☒ Oth 2

(7.54.2.2) Date target was set

(7.54.2.3) Target coverage

Select from:

☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:

☒ Absolute

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Other

☒ Other metric, please specify :Establish a science-based reduction target for our Scope 1, 2 and 3 GHG emissions

(7.54.2.7) End date of base year

12/31/2025

(7.54.2.9) End date of target

12/31/2026

(7.54.2.13) Target status in reporting year

Select from:

☒ New

(7.54.2.15) Is this target part of an emissions target?

Yes, this target is to set an emissions target by the end of 2026.

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

☒ No, it's not part of an overarching initiative

Row 3

(7.54.2.1) Target reference number

Select from:

☒ Oth 3

(7.54.2.2) Date target was set

05/06/2025

(7.54.2.3) Target coverage

Select from:

☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from:

☒ Absolute

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Other

☒ Other metric, please specify :Be on track to meet our 2035 (or earlier) science-based greenhouse gas emission reduction target established by 2026

(7.54.2.7) End date of base year

12/31/2025

(7.54.2.9) End date of target

(7.54.2.13) Target status in reporting year

Select from:

☒ New

(7.54.2.15) Is this target part of an emissions target?

Yes, this target is to make progress against the emission target that we set.

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

☒ No, it's not part of an overarching initiative

[Add row]

(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.

	Emissions reduction initiatives that were active within the reporting year
	Select from: ☒ Yes

[Fixed row]

(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	23	
To be implemented	18	63090
Implementation commenced	2	6509
Implemented	5	24868
Not to be implemented	0	

[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)

24868

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

☒ Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

(7.55.2.9) Comment

This is the sum of four optimization projects that were implemented in the reporting year.

[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:

☒ Internal price on carbon

(7.55.3.2) Comment

Domtar's Canadian facilities are subject to carbon pricing under provincial carbon pricing systems in British Columbia (four regulated facilities) and Quebec (ten regulated facilities). The applicable compliance obligation effectively serves as an internal carbon price because emission reductions reduce compliance costs and, in some cases, may generate compliance credits. Carbon costs and savings are incorporated into project evaluations where material. Domtar is also evaluating the implementation of a shadow carbon price to more consistently incorporate the value of greenhouse gas reductions into capital investment decisions across the organization.

Row 2

(7.55.3.1) Method

Select from:

☒ Internal finance mechanisms

(7.55.3.2) Comment

Domtar seeks to integrate emissions reduction objectives into broader capital planning and asset reliability programs. Decarbonization opportunities that can be implemented alongside maintenance, modernization or reliability investments are prioritized because they improve project economics and reduce implementation risk. Aligning emissions reduction projects with planned capital expenditures increases the likelihood that projects receive funding and are implemented efficiently.

Row 3

(7.55.3.1) Method

Select from:

☒ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

Regulatory carbon pricing programs in Canada create a direct financial incentive for facilities to improve energy efficiency and reduce fossil fuel consumption. Facilities operating under output-based pricing systems and cap-and-trade programs may reduce compliance costs or generate surplus credits through emissions reductions. To support investment decisions, Domtar is enhancing its reporting and forecasting processes to improve visibility into current and future carbon costs, helping identify and prioritize projects with emissions reduction benefits.

Row 4

(7.55.3.1) Method

Select from:

☒ Partnering with governments on technology development

(7.55.3.2) Comment

Domtar collaborates with industry associations, government agencies and research organizations to identify, evaluate and advance emerging low-carbon technologies. Domtar's participation in the Pulp and Paper Technical Association of Canada supports the ongoing technical advancement of the industry. Through its participation in the Alliance for Pulp & Paper Technology Innovation (APPTI), including APPTI's Energy Efficiency and Innovation Team, Domtar helps assess technologies that can improve operational efficiency, reduce fossil fuel consumption and support long-term emissions reductions. These partnerships improve access to technical expertise and potential funding opportunities, helping accelerate investment in emission reduction projects.

Row 5

(7.55.3.1) Method

Select from:

☒ Employee engagement

(7.55.3.2) Comment

On May 6, 2025, Domtar announced its 2030 Sustainability Strategy, including commitments to decarbonize operations, products and the value chain. Communicating these commitments throughout the organization helps align business units around climate objectives and increases awareness of opportunities to reduce emissions. Sustainability and climate priorities are incorporated into strategic planning discussions, helping identify and advance projects that support both environmental and business objectives.

Row 6

(7.55.3.1) Method

Select from:

☒ Other :Government Incentives/Grants

(7.55.3.2) Comment

Domtar actively evaluates and pursues external funding opportunities, including government grants, tax incentives and industrial decarbonization programs, to improve project economics and accelerate implementation of emissions reduction initiatives. External funding can significantly reduce capital costs and increase the financial viability of projects involving energy efficiency, fuel switching, electrification and emerging technologies.

[Add row]

(7.67) Do you implement agriculture or forest management practices on your own land with a climate change mitigation and/or adaptation benefit?

Select from:

☒ Yes

(7.67.1) Specify the agricultural or forest management practice(s) implemented on your own land with climate change mitigation and/or adaptation benefits and provide a corresponding emissions figure, if known.

Row 1

(7.67.1.1) Management practice reference number

Select from:

☒ MP1

(7.67.1.2) Management practice

Select from:

☒ Fertilizer management

(7.67.1.3) Description of management practice

98% of the residues produced at Domtar's Windsor facility are recycled or reused. This includes reusing mill wastewater treatment residuals, wood ash produced by the bark boiler and lime for fertilizer. Mill wastewater treatment residuals are used in our areas of intensive forest management. Ash from the bark boiler is used to fertilize maple trees on our property which are part of our partnership with local maple syrup producers. There are 275,000 taps producing 82,000 gallons of maple syrup within Domtar's Windsor forest. Domtar's lime mud has been certified according to the BNQ 0419-090 standard by the Bureau de normalization du Québec. We are the only pulp and paper mill in Quebec to have received this certification. This lime mud can be used as fertilizer in our land and neighboring agricultural farms to improve soil pH and increase plant growth.

(7.67.1.4) Primary climate change-related benefit

Select from:

☒ Reduced demand for fertilizers (adaptation)

(7.67.1.6) Please explain

CO2e savings have not been estimated. Emission reductions would be expected to come from reduced use of petrochemical-based fertilizers, enhanced forest growth that sequesters additional atmospheric CO2 over the forest rotation and enhance carbon storage in forest soils.

Row 2

(7.67.1.1) Management practice reference number

Select from:

☒ MP2

(7.67.1.2) Management practice

Select from:

☒ Biodiversity considerations

(7.67.1.3) Description of management practice

Domtar manages 160,000 hectares of forest in Windsor, Quebec. Our sustainable forest management strategy employs various techniques including conservation/protection (5-10%), intensive management (5-10%) and ecosystem based management (80%+). The area under ecosystem-based management reflects the following characteristics: reduced wood production, longer rotation and diversification of harvesting, maintenance of a certain biological heritage, and management at the level of the territory.

(7.67.1.4) Primary climate change-related benefit

Select from:

☒ Increasing resilience to climate change (adaptation)

(7.67.1.6) Please explain

CO2e savings have not been estimated. CO2e emission reductions are expected through sustainable forest management activities that promote enhanced carbon sequestration in trees and other forest vegetation and management practices that enhance soil carbon stocks. Keeping land in forests also maintains the ability of land-based systems to main ecosystem services to sequester carbon and enhance resiliency.

Row 3

(7.67.1.1) Management practice reference number

Select from:

☒ MP3

(7.67.1.2) Management practice

Select from:

- ☒ Enhanced forest regeneration practices

(7.67.1.3) Description of management practice

Domtar implements enhanced forest regeneration on the land we manage in Windsor, Quebec. Using native tree species we ensure that 100% of the areas we harvest are regenerated with mix of planting and natural regeneration.

(7.67.1.4) Primary climate change-related benefit

Select from:

- ☒ Increase carbon sink (mitigation)

(7.67.1.6) Please explain

CO2e savings have not been estimated. Regeneration of forests through planting and natural means helps build back carbon stocks sooner after disturbances from both harvests and natural disturbances.

Row 4

(7.67.1.1) Management practice reference number

Select from:

- ☒ MP4

(7.67.1.2) Management practice

Select from:

- ☒ Efficient equipment use

(7.67.1.3) Description of management practice

Domtar continues to explore emerging transportation technologies aimed at improving operational efficiency and reducing GHG emissions in woodlands operations. Through multiyear testing in the Saguenay-Lac-Saint-Jean region of Quebec, the company is evaluating hybrid planetary logging trucks capable of shifting between diesel and electric modes in demanding forestry environments, including cold-weather conditions. Domtar is also collaborating with FPInnovations and technology partners to assess truck platooning systems, where electronically connected trucks travel in convoy to support more efficient and lower-carbon forestry logistics.

Recent field trials demonstrated stable performance under real forestry operation conditions, helping assess the long-term potential of these technologies within day to day operations.

(7.67.1.4) Primary climate change-related benefit

Select from:

☒ Reduced demand for fossil fuel (adaptation)

(7.67.1.6) Please explain

Detailed CO₂e savings have not been estimated. It is estimated that truck platooning can result in approximately 30% reduction in diesel consumption and electrification can reduce fuel use by 10-15%.

[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 2

(7.68.1.1) Management practice reference number

Select from:

☒ MP2

(7.68.1.2) Management practice

Select from:

☒ Knowledge sharing

(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 2025, 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.

Row 3

(7.68.1.1) Management practice reference number

Select from:

☒ MP3

(7.68.1.2) Management practice

Select from:

☒ Knowledge sharing

(7.68.1.3) Description of management practice

Domtar participates in SFI State Implementation Committees in every province and state where we have mill operations. Through this engagement we work with and provide resources to forestry professionals and suppliers on improved forest management practices which have an impact on climate change mitigation and adaptation. Specifically through our engagement with the SIC in Quebec we participated in the SFI Climate Smart Forestry Advisory Committee. Through our participation we collaborated on solutions with other industry partners, invested in research and applied innovation, and empowered field teams to test and implement solutions.

(7.68.1.4) Your role in the implementation

Select all that apply

☒ Financial

☒ Knowledge sharing

☒ Operational

(7.68.1.5) Explanation of how you encourage implementation

Implementation is encouraged through direct field application and testing of emerging practices. Forestry professionals and operational teams are provided opportunities to evaluate recommendations under real-world conditions, helping validate their effectiveness and identify approaches that can be scaled across managed forests. This practical testing helps bridge the gap between research and operational implementation. Domtar also promotes uptake by supporting continuing education and professional development for forestry staff, contractors, and suppliers. Through SIC-sponsored workshops, training sessions, field tours, and technical exchanges, suppliers are encouraged to remain current on climate-smart forestry practices and incorporate new approaches into their management activities. In addition, lessons learned and best practices are integrated into wood procurement expectations and supplier engagement processes where appropriate. By embedding climate and sustainability considerations into procurement requirements, operational guidance, and supplier communications, Domtar helps ensure that research outcomes and innovative management approaches are consistently applied across its supply chain. This combination of collaborative research, field testing, continuing education, and integration into procurement processes helps move climate-smart forestry concepts from research into practice, supporting broader adoption across the landscapes from which Domtar sources fiber.

(7.68.1.6) Climate change related benefit

Select all that apply

- ☒ Emissions reductions (mitigation)
- ☒ Increasing resilience to climate change (adaptation)

[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

(7.69) Do you know if any of the management practices implemented on your own land disclosed in 7.67.1 have other impacts besides climate change mitigation/adaptation?

Select from:

- ☒ Yes

(7.69.1) Provide details on those management practices that have other impacts besides climate change mitigation/adaptation and on your management response.

Row 1

(7.69.1.1) Management practice reference number

Select from:

☒ MP1

(7.69.1.2) Overall effect

Select from:

☒ Positive

(7.69.1.3) Which of the following has been impacted?

Select all that apply

☒ Soil

☒ Yield

(7.69.1.4) Description of impact

This aspect of our environmental strategy for beneficial use of mill manufacturing residuals has enabled us to recover more than 98% of residues from our Windsor operations as part of a circular economy. We have already seen impressive improvements in tree growth and regeneration by using the lime and boiler ash to fertilize and amend forest soils.

(7.69.1.5) Have you implemented any response to these impacts?

Select from:

☒ Yes

(7.69.1.6) Description of the response

We will continue to implement this strategy and incorporate new better practices as they become available.

Row 2

(7.69.1.1) Management practice reference number

Select from:

☒ MP2

(7.69.1.2) Overall effect

Select from:

☒ Positive

(7.69.1.3) Which of the following has been impacted?

Select all that apply

☒ Biodiversity

(7.69.1.4) Description of impact

Our ecosystem-based management approach prioritizing biodiversity and maintenance of a certain biological heritage through longer rotation and diversification of harvesting.

(7.69.1.5) Have you implemented any response to these impacts?

Select from:

☒ Yes

(7.69.1.6) Description of the response

We will continue to implement this strategy and incorporate new better practices as they become available.

Row 3

(7.69.1.1) Management practice reference number

Select from:

☒ MP3

(7.69.1.2) Overall effect

Select from:

☒ Positive

(7.69.1.3) Which of the following has been impacted?

Select all that apply

☒ Biodiversity

☒ Yield

(7.69.1.4) Description of impact

Implementing enhanced regeneration in the areas of our forest land which are intensely managed, allows us to increase the wood supply while protecting biodiversity by using native species. This allows us to implement ecosystem-based management in 80%+ of the forest and reduce wood supply.

(7.69.1.5) Have you implemented any response to these impacts?

Select from:

☒ Yes

(7.69.1.6) Description of the response

We will continue to implement this strategy and incorporate new better practices as they become available.

Row 4

(7.69.1.1) Management practice reference number

Select from:

☒ MP4

(7.69.1.2) Overall effect

Select from:

☒ Positive

(7.69.1.3) Which of the following has been impacted?

Select all that apply

- ☒ Biodiversity
- ☒ Soil
- ☒ Water

(7.69.1.4) Description of impact

Implementing forestry logistics efficiencies, specifically the use of truck platooning systems, reduces the number of truck loads which need to be transported in and out of the forest. By reducing traffic we can reduce our impact on soil and water, and more indirectly on biodiversity.

(7.69.1.5) Have you implemented any response to these impacts?

Select from:

- ☒ Yes

(7.69.1.6) Description of the response

We will continue to implement this strategy and incorporate new better practices as they become available.
[Add row]

(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.

Row 2

(7.70.1.1) Management practice reference number

Select from:

☒ MP3

(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

(7.70.1.4) Description of impacts

Domtar promotes uptake by supporting continuing education and professional development for forestry staff, contractors, and suppliers. Through SIC-sponsored workshops, training sessions, field tours, and technical exchanges, suppliers are encouraged to remain current on climate-smart forestry practices and incorporate new approaches into their management activities. In addition, lessons learned and best practices are integrated into wood procurement expectations and supplier engagement processes where appropriate. By embedding climate and sustainability considerations into procurement requirements, operational guidance, and supplier communications, Domtar helps ensure that research outcomes and innovative management approaches are consistently applied across its supply chain. This combination of collaborative research, field testing, continuing education, and integration into procurement processes helps move climate-smart forestry concepts from research into practice, supporting broader adoption across the landscapes from which Domtar sources fiber.

(7.70.1.5) Have any response to these impacts been implemented?

Select from:

☒ Yes

(7.70.1.6) Description of the response(s)

We are aware of several climate smart practices that have been implemented by suppliers through our engagement in the SFI SIC's.
[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

0.34

(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.

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 2.6 billion board feet, our 15 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

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.
[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

☒ Yes

(7.79.1) Provide details of the project-based carbon credits retired by your organization in the reporting year.

Row 1

(7.79.1.1) Project type

Select from:

☒ Wind

(7.79.1.2) Type of mitigation activity

Select from:

☒ Emissions reduction

(7.79.1.3) Project description

The main purpose of this project activity is to generate clean form of electricity through renewable wind energy source. The project involves installation of 250 MW wind power project in Tamil Nadu state of India through a Special Purpose Vehicle (SPV). Over the 10 years of first crediting period, the project will replace anthropogenic emissions of greenhouse gases (GHG's) estimated to be approximately 7,07,799 tCO₂e per year, there on displacing 755,550 MWh/year amount of electricity from the generation-mix of power plants connected to the Indian grid, which is mainly dominated by thermal/fossil fuel based power plant.

(7.79.1.4) Credits retired by your organization from this project in the reporting year (metric tons CO₂e)

10000

(7.79.1.5) Purpose of retirement

Select from:

☒ Voluntary offsetting

(7.79.1.6) Are you able to report the vintage of the credits at retirement?

Select from:

☒ No

(7.79.1.8) Were these credits issued to or purchased by your organization?

Select from:

☒ Purchased

(7.79.1.9) Carbon-crediting program by which the credits were issued

Select from:

☒ VCS/Verra (Verified Carbon Standard)

(7.79.1.10) Method the program uses to assess additionality for this project

Select all that apply

☒ Investment analysis

☒ Barrier analysis

(7.79.1.11) Approaches by which the selected program requires this project to address reversal risk

Select all that apply

☒ No risk of reversal

(7.79.1.12) Potential sources of leakage the selected program requires this project to have assessed

Select all that apply

☒ Upstream/downstream emissions

☒ Market leakage

(7.79.1.13) Provide details of other issues the selected program requires projects to address

Under Verra's ACM0002, project proponents must apply the CDM additionality tool.

(7.79.1.14) Please explain

See project details at: <https://registry.terra.org/terra/public/program/VCS/projects/1904>

Row 2

(7.79.1.1) Project type

Select from:

☒ Other, please specify :Forest Carbon Offset Protocol (British Columbia)

(7.79.1.2) Type of mitigation activity

Select from:

☒ Carbon removal

(7.79.1.3) Project description

The Great Bear Rainforest is one of the world's last large, intact coastal temperate rainforests. Stretching across 6.4 million hectares on British Columbia's northern coast, it contributes to carbon absorption on a massive scale. This landscape is home to diverse wildlife, including the rare Spirit Bear. First Nations communities have protected and cared for this rainforest for over 14,000 years. What makes the Great Bear Rainforest truly special is its role as a globally recognized model for conservation and sustainable resource management. By purchasing Great Bear Carbon offsets, individuals and companies support conserving this environment and the communities that protect it.

(7.79.1.4) Credits retired by your organization from this project in the reporting year (metric tons CO2e)

45000

(7.79.1.5) Purpose of retirement

Select from:

☒ Compliance with a carbon pricing system

(7.79.1.6) Are you able to report the vintage of the credits at retirement?

Select from:

☒ Yes

(7.79.1.7) Vintage of credits at retirement

2021

(7.79.1.8) Were these credits issued to or purchased by your organization?

Select from:

☒ Purchased

(7.79.1.9) Carbon-crediting program by which the credits were issued

Select from:

☒ Other regulatory carbon crediting program, please specify :British Columbia Output Based Pricing System

(7.79.1.10) Method the program uses to assess additionality for this project

Select all that apply

☒ Consideration of legal requirements

☒ Investment analysis

☒ Other, please specify :The British Columbia Forest Carbon Offset Protocol assesses additionality primarily through a regulatory surplus and baseline scenario approach.

(7.79.1.11) Approaches by which the selected program requires this project to address reversal risk

Select all that apply

☒ Other, please specify :Credit buffer pool

(7.79.1.12) Potential sources of leakage the selected program requires this project to have assessed

Select all that apply

☒ Activity-shifting

☒ Market leakage

☒ Other, please specify :IFM projects can induce leakage through timber displacement, operational displacement, and wood products impacts.

(7.79.1.13) Provide details of other issues the selected program requires projects to address

The British Columbia Forest Carbon Offset Protocol requires proponents to address issues of permanence, quantification of forest carbon stocks, monitoring and verification, and legal ownership and rights. Permanence: The Great Bear project uses a 100-year permanence framework and a provincial buffer/insurance pool that

retains a portion of issued credits to cover future carbon losses from events such as wildfire, disease, or other reversals. Quantification of forest carbon stocks: Projects must establish baseline carbon stocks, estimate project scenario carbon stocks, quantify avoided emissions and increased carbon storage, undergo periodic monitoring and recalculation. Monitoring and verification: projects are required to maintain inventories, monitor forest conditions, document harvesting activities, and undergo independent third-party verification before credits are issued. Legal ownership and rights: the project relies on explicit agreement between First Nations and the province in the form of an Atmospheric Benefits Agreement.

(7.79.1.14) Please explain

See more information at: <https://www.greatbearcarbon.ca/>
[Add row]

C8. Environmental performance - Forests

(8.1) Are there any exclusions from your disclosure of forests-related data?

	Exclusion from disclosure
Timber products	Select from: ☒ Yes

[Fixed row]

(8.1.1) Provide details on these exclusions.

Timber products

(8.1.1.1) Exclusion

Select from:

☒ Geographical area

(8.1.1.2) Description of exclusion

Mistik Management Ltd., is an equal partnership (50/50) between Domtar's Meadow Lake pulp mill and NorSask Forest Products (owned by the Meadow Lake Tribal Council.) Mistik Management Ltd. holds the provincial forest management agreement for 1,878,499 hectares of public land in Saskatchewan. This management unit is FSC and PEFC certified. Daily operations, including all forest management, harvesting, log delivery and certification activities, is carried out by Mistik. Domtar board members in conjunction with Meadow Lake Tribal Council board members provide high level, strategic direction. Domtar does not manage daily operations. From an operational perspective Mistik Management Ltd. is considered a supplier for Domtar's Meadow Lake pulp mill.

(8.1.1.3) Value chain stage

Select from:

☒ Upstream value chain

(8.1.1.4) Reason for exclusion

Select from:

☒ Other, please specify :No operational control

(8.1.1.5) Primary reason why data is not collected and/or reported for your disclosed commodity

Select from:

☒ Other, please specify :No operational control, no visibility into data

(8.1.1.8) Indicate if you are providing the commodity volume that is being excluded from your disclosure of forests-related data

Select from:

☒ No, the volume excluded is unknown

(8.1.1.10) Please explain

No sourced fiber volume is excluded. Hectares of land managed are excluded. Management activities for this forest operation are not considered part of Domtar's operations. Mistik Management Ltd. is considered a supplier for Domtar's Meadow Lake pulp mill. Any fiber sourced from this forest operation is purchased and disclosed as a fiber purchased from a third party supplier rather than produced on our own managed lands.

[Add row]

(8.2) Provide a breakdown of your disclosure volume per commodity.

Timber products

(8.2.1) Disclosure volume (metric tons)

15435259

(8.2.2) Volume type

Select all that apply

☒ Produced

☒ Sourced

(8.2.3) Produced volume (metric tons)

3826161

(8.2.4) Sourced volume (metric tons)

11609097

[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)

19708020

(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)

3735000

(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

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)

140000

(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

[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)

4070000

(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. Protection within our management units covers other measures that contribute to the conservation of biodiversity, including but not limited to 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 2

(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)

8685

(8.4.1.5) % covered by natural forests and other natural ecosystems

100

(8.4.1.6) Please explain

Domtar has a privately owned forest of 8,685 hectares in the province of Quebec, Canada where there are no current or planned harvest activities. This forest management unit is SFI forest management certified. There is no plans of future operations or expansions that could create a risk of deforestation or conversion of the natural ecosystems on the property. We are currently exploring projects that will support maintenance of this property as a natural forest.

[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, British Columbia, Alberta, Saskatchewan

(8.5.4) Volume sourced from country/area of origin (metric tons)

7551281

(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

(8.5.7) 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

Alabama Arkansas California Florida Idaho Illinois Indiana Kentucky Louisiana Maine Mississippi Montana New Hampshire New York North Carolina Ohio Oklahoma Oregon Pennsylvania South Carolina Tennessee Texas Vermont Virginia Washington Wisconsin

(8.5.4) Volume sourced from country/area of origin (metric tons)

5821629

(8.5.5) Source

Select all that apply

- ☒ Independent smallholders
☒ Multiple contracted producers
☒ Trader/broker/commodity market
☒ Contracted suppliers (processors)

(8.5.7) Please explain

In the US 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)

7663

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Domtar's tissue business sources a small volume of eucalyptus pulp originating in Uruguay. All pulp is sourced as FSC Certified.

Timber products

(8.5.1) Country/area of origin

Select from:

☒ Brazil

(8.5.2) First level administrative division

Select from:

☒ States/equivalent jurisdictions

(8.5.3) Specify the states or equivalent jurisdictions

State of Bahia

(8.5.4) Volume sourced from country/area of origin (metric tons)

7669

(8.5.5) Source

Select all that apply

☒ Contracted suppliers (manufacturers)

(8.5.7) Please explain

Domtar's tissue business sources a small volume of eucalyptus pulp originating in Brazil. All pulp is sourced as FSC Certified.
[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?

	Active no-deforestation or no-conversion target	Other active targets related to this commodity, including any which contribute to your no-deforestation or no-conversion target
Timber products	Yes ☒ Yes, we have a 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 commitment "Prohibit wood or fiber from forest conversion or deforestation, except for limited, legally authorized land-use change accepted by independent forest certification standards" 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." We continue to define and build additional monitoring measures to increase the robustness of this commitment.

(8.7.1.3) No-deforestation or no-conversion target coverage

Select from:

☒ Organization-wide (including suppliers)

(8.7.1.4) Cutoff date

Select from:

☒ 1993-1997

(8.7.1.6) Rationale for selecting cutoff date

Select from:

☒ Sector-wide agreement/recommendation

(8.7.1.7) 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:

☒ Forests target 1

(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

Performance of owned or managed processing facilities

☒ % of processing facilities with DCF/NDPE commitments

(8.7.2.8) Date target was set

05/06/2025

(8.7.2.9) End date of base year

12/31/2023

(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

50

(8.7.2.14) Target status in reporting year

Select from:

☒ Underway

(8.7.2.15) % of target achieved relative to base year

50.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Global environmental treaty/ initiative/ framework

☒ Sustainable Development Goals

(8.7.2.17) Explain target coverage and identify any exclusions

Target covers all of Domtar's forest management and manufacturing operations as well as the wood and fiber value chain. Full policy release will be completed in 2026 however critical work occurred in 2025 to support development of Domtar's updated integrated policies. This including benchmarking exercises, stakeholder consultation, and key decisions surrounding process, scope and involved team members.

(8.7.2.18) Plan for achieving target, and progress made to the end of the reporting year

Following the integration of legacy companies under the Domtar brand, the company has been advancing harmonized reporting, disclosure, and governance processes since the beginning of 2025. A key focus has been the development of enterprise-wide policies for forest management and wood and fiber procurement to provide consistent direction across operations. Given Domtar's footprint across three distinct regions, policy development has involved benchmarking against industry

practices, aligning commitments, and establishing common standards that reflect regional operating contexts. Both policies are in the final stages of development and are currently under legal review. Domtar remains on track to complete and implement these policies by the end of 2026.

(8.7.2.20) Further details of target

Establish responsible wood and fiber sourcing and forest management policy in consultation with stakeholders

Timber products

(8.7.2.1) Target reference number

Select from:

☒ Forests target 3

(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% third-party certification for our manufacturing facilities and forest operations

(8.7.2.7) Third-party certification scheme

Forest management unit/Producer certification

☒ FSC Controlled Wood certification

☒ FSC 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

05/06/2025

(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

12/31/2025

(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

Global environmental treaty/ initiative/ 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 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:

☒ Forests target 3

(8.7.2.2) Target contributes to no-deforestation or no-conversion target reported in 8.7.1

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

Traceability

☒ % of volume traceable to traceability point

(8.7.2.6) Traceability point

Select from:

☒ Production unit

(8.7.2.8) Date target was set

05/06/2025

(8.7.2.9) End date of base year

12/31/2023

(8.7.2.10) Base year figure

0

(8.7.2.11) End date of target

12/31/2025

(8.7.2.12) Target year figure

(8.7.2.13) Reporting year figure

56

(8.7.2.14) Target status in reporting year*Select from:*☒ Underway**(8.7.2.15) % of target achieved relative to base year**

56.00

(8.7.2.16) Global environmental treaties/ initiatives/ frameworks aligned with or supported by this target

Global environmental treaty/ initiative/ framework

☒ Sustainable Development Goals**(8.7.2.17) Explain target coverage and identify any exclusions**

In 2023, Domtar underwent a significant acquisition bringing together Resolute Forest Products with Domtar Paper Company and Paper Excellence. Each individual legacy company had established goals and targets, monitoring systems and practices related to forest management and fiber sourcing. While it is not accurate to say that % of traceability across these legacy companies zero, given the integration of policies, practices, monitoring systems and alignment across legacy companies for purpose of disclosure we use 0 baseline.

(8.7.2.18) Plan for achieving target, and progress made to the end of the reporting year

Domtar is working towards compliance with EUDR requirements with the ultimate goal to achieve compliance. 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.

(8.7.2.20) Further details of target

100% of wood and fiber sourced from responsibly managed forests

[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 or purchase order 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

56

(8.8.1.2) % of sourced volume traceable to sourcing area and not to production unit

43

(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

41

(8.9.3) % of disclosure volume determined as DF/DCF through a third-party certification scheme providing full DF/DCF assurance

15

(8.9.4) % of disclosure volume determined as DF/DCF through monitoring of production unit

27

(8.9.5) % of disclosure volume determined as DF/DCF through monitoring of sourcing area

0

(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

8

(8.9.1.3) Comment

Domtar currently manages four FSC Forest Management certificates across our portfolio. An example certificate is uploaded, but due to constraints in the platform not all four certificates are included. All certificates are publicly available on search.fsc.org.

(8.9.1.4) Certification documentation

FSC-FM-ENG-Domtar (1).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

15

(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 five FSC chain of custody certificates across our portfolio for this commodity. An example certificate is uploaded, but due to constraints in the platform not all five 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-2Dec25 (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 five FSC Controlled Wood and Chain of Custody certificates across our portfolio for this commodity. An example certificate is uploaded, but due to constraints in the platform not all five certificates are included. All certificates are publicly available on search.fsc.org.

(8.9.1.4) Certification documentation

Paper-Excellence-Canada-Holdings.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

27.00

(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 units are 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

27

(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.

[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 Sustainability Strategy, we are working on a fiber tracking initiative which may 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: ☒ 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

28

(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:

☒ 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 is working towards compliance with EUDR requirements with the ultimate goal to achieve compliance. 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	<i>Select from:</i> ☒ Yes	<i>Select from:</i> ☒ 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

The GHG Protocol's Land Sector and Removals Guidance released in 2025 did not include guidance for the forestry sector as anticipated. As a result, Domtar is reassessing the available frameworks and engaging across the industry and with key stakeholders to determine a credible approach absent of guidance from the GHG Protocol. Our first step will be to complete a biogenic inventory and then will evaluate target setting potentials.
[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 | ☒ Ground-based monitoring |
| ☒ First party audits | ☒ Supplier self-declaration |
| ☒ Third party audits | ☒ Remote sensing or other geospatial monitoring |
| ☒ Second party audits | |

☒ Third party databases

(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: ☒ 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

- | | |
|--|--|
| ☒ Risk of fires | ☒ Opportunity to protect and restore natural ecosystems |
| ☒ Response to regulation communities | ☒ Opportunity to increase market access for smallholders and local |
| ☒ Commodity sourcing footprint | ☒ Ability to contribute to/ build on existing landscape/jurisdictional initiatives |
| ☒ Stakeholder/investor request | |

☒ Organization has operational presence in area

(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 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 increase 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) Latitude

51.850612

(8.15.2.5) Longitude

-87.132919

(8.15.2.6) Name of landscape or jurisdiction area

Ontario

(8.15.2.8) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ Yes

(8.15.2.9) Area covered by the initiative (ha)

3860190

(8.15.2.10) 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

(8.15.2.11) Engagement start year

(8.15.2.12) Engagement end year

Select from:

☒ Please specify :2027

(8.15.2.13) Estimated investment over the project period

200000

(8.15.2.14) Landscape goals supported by engagement

Environmental

- ☒ Biodiversity protected and/or restored
- ☒ Increased and/or maintained protected areas
- ☒ Natural ecosystems conserved and/or restored

(8.15.2.15) 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

(8.15.2.16) 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

(8.15.2.17) Description of engagement

Domtar directly manages forests under a Sustainable Forest License (SFL), which is granted by the Ontario government. Forests within the Caribou range are actively managed sustainability per the provincial policy and it's relation under the conservation agreement.

(8.15.2.18) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

- ☒ Yes, progress is collectively monitored using a shared external framework, please specify :The Plan is monitored by the provincial government with our collaboration and input.

(8.15.2.19) 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 are managed sustainability and continue to provide timber supply, 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.

(8.15.2.20) Claims made

Select from:

- ☒ No, we are not making any claims, and we do not plan to within the next two years

Row 3

(8.15.2.1) Landscape/jurisdiction ID

Select from:

- ☒ LJ2

(8.15.2.2) Name of initiative

(8.15.2.3) Country/area

Select from:

☒ United States of America

(8.15.2.4) Latitude

40.972732

(8.15.2.5) Longitude

-77.468062

(8.15.2.6) Name of landscape or jurisdiction area

Pennsylvania

(8.15.2.8) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ Yes

(8.15.2.9) Area covered by the initiative (ha)

5000

(8.15.2.10) Type of engagement

Select all that apply

☒ Partner: Shares responsibility with other stakeholders to manage and implement actions.

(8.15.2.11) Engagement start year

2025

(8.15.2.12) Engagement end year

Select from:

☒ Not defined

(8.15.2.13) Estimated investment over the project period

25000

(8.15.2.14) Landscape goals supported by engagement

Environmental

- ☒ Biodiversity protected and/or restored
- ☒ Decreased ecosystem degradation rate
- ☒ Ecosystem services maintained and/or enhanced

Production

- ☒ Sustainability of other natural resource-based production sectors promoted to and recognized by relevant stakeholders (e.g. mining, natural forest management and non-extractive uses)

(8.15.2.15) 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
- ☒ Identify and act on opportunities for pre-competitive collaboration with your sector

Build community and multi-stakeholder capacities

- ☒ Engage stakeholders on importance of conservation, restoration and/or rehabilitation

(8.15.2.16) Type of partners engaged in the initiative design and implementation

Select all that apply

- ☒ NGO and/or civil society
- ☒ Producers
- ☒ Private sector

(8.15.2.17) Description of engagement

To strengthen biodiversity conservation within its fiber supply chain, Domtar partnered with NatureServe, the Pennsylvania Natural Heritage Program, SFI and an important customer to support completion of a Forests of Exceptional Conservation Value (FECV) assessment for the approximately 50-mile fiber procurement area surrounding the Johnsonburg, Pennsylvania mill. The project supports biodiversity-related requirements of the Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC), which call for the identification and protection of high conservation value habitats within sourcing regions. The assessment addresses a key challenge in responsible fiber sourcing: translating complex biodiversity data into practical guidance for foresters, loggers, and landowners. Within the Johnsonburg procurement area, the study identified 173 imperiled species and 12 imperiled natural communities. Rather than relying solely on lengthy species lists, NatureServe developed a landscape-based approach that groups species and ecosystems according to shared habitat requirements and links them to easily identifiable Unique Landscape Features (ULFs). The project established management recommendations for each ULF to help protect biodiversity while supporting sustainable forest management. Sensitive habitats such as old forests, wetlands, vernal pools, and forested rock outcrops were designated as Conserve areas requiring avoidance, buffering, or enhanced protection. Rich Forests of Coves and Lower Slopes were categorized as Promote, recognizing that carefully planned forestry activities can be compatible with maintaining ecological values. Domtar then used the outcomes of this work to engage over 100 forestry professionals in the area on management practices. This initiative strengthens Domtar's biodiversity due diligence, supports compliance with FSC and SFI requirements, and advances landscape-scale conservation within the company's sourcing area. It also establishes a repeatable, science-based framework for identifying and managing high conservation value habitats while promoting positive biodiversity outcomes across working forest landscapes.

(8.15.2.18) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

- ☒ Yes, progress is collectively monitored using a shared external framework, please specify :NatureServe

(8.15.2.19) State the achievements of your engagement so far and how progress is monitored

The initial pilot project in Pennsylvania is complete and was extremely successful. We are now working to scale this concept in other regions working pre-competitively with actors across the value chain and other stakeholders. In 2026 a project in Mississippi has been initiated.

(8.15.2.20) Claims made

Select from:

- ☒ No, we are not making any claims, and we do not plan to within the next two years

Row 4

(8.15.2.1) Landscape/jurisdiction ID

Select from:

☒ LJ3

(8.15.2.2) Name of initiative

Gander Lake Conservation Land Donation, Newfoundland and Labrador with Nature Conservancy Canada

(8.15.2.3) Country/area

Select from:

☒ Canada

(8.15.2.4) Latitude

48.923831

(8.15.2.5) Longitude

-54.707348

(8.15.2.6) Name of landscape or jurisdiction area

Newfoundland

(8.15.2.8) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ Yes

(8.15.2.9) Area covered by the initiative (ha)

1800

(8.15.2.10) 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

(8.15.2.11) Engagement start year

2025

(8.15.2.12) Engagement end year

Select from:

- ☒ Not defined

(8.15.2.13) Estimated investment over the project period

1450000

(8.15.2.14) Landscape goals supported by engagement

Environmental

- ☒ Avoided deforestation/conversion of other natural ecosystems and/or decreased degradation rate
- ☒ Biodiversity protected and/or restored
- ☒ Increased and/or maintained protected areas
- ☒ Natural ecosystems conserved and/or restored

(8.15.2.15) 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 establishing and managing monitoring system for deforestation, natural ecosystem conversion and/or degradation

Build community and multi-stakeholder capacities

- ☒ Engage stakeholders on importance of conservation, restoration and/or rehabilitation

(8.15.2.16) Type of partners engaged in the initiative design and implementation

Select all that apply

- ☒ Indigenous peoples
- ☒ Local communities
- ☒ NGO and/or civil society
- ☒ Private sector

(8.15.2.17) Description of engagement

In 2025, Domtar partnered with the Nature Conservancy of Canada (NCC) to support the conservation of more than 1,800 hectares (4,400 acres) of ecologically significant land along the Southwest Gander River and Gander Lake in central Newfoundland and Labrador. Through the donation of four large parcels of forested land and associated freshwater ecosystems, the project represents the largest private conservation securement undertaken by NCC in Atlantic Canada and contributes to long-term protection of boreal forest, wetlands, shoreline, and aquatic habitats. The project was initiated to address biodiversity loss and strengthen ecological connectivity within a region where less than three percent of the Central Newfoundland ecoregion is currently under conservation status. The conserved lands are strategically located near existing and proposed protected areas, including Jonathan's Pond Provincial Park Reserve, the proposed Rodney Pond Wilderness Reserve, and the Charlie's Place protected area proposed by Qalipu First Nation. By protecting these lands, the project enhances landscape connectivity and wildlife movement across a broader conservation network. The properties are located within the Gander River watershed, one of Newfoundland's most important Atlantic salmon systems, providing significant ecological, recreational, and economic value. The project protects habitat for numerous species of conservation concern. The area lies within the range of the Middle Ridge and Mount Peyton caribou herds and supports species listed under Canada's Species at Risk Act, including Newfoundland pine marten, red crossbill, rusty blackbird, and blue felt lichen. It also provides important habitat for Arctic char, brook trout, large purple fringed orchid, and three-way sedge. Implemented in partnership with NCC and supported through the Government of Canada's Natural Heritage Conservation Program, the initiative provides for long-term conservation, stewardship, and monitoring of these lands while maintaining compatible recreational uses such as legal hunting and fishing.

(8.15.2.18) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

- ☒ Yes, progress is collectively monitored using a shared external framework, please specify :NCC will create a long term management plan for the parcel

(8.15.2.19) State the achievements of your engagement so far and how progress is monitored

The land donation became legally complete in the second half of 2025. NCC will now assess and complete a management plan for the parcel including any restoration activities. We will continue to engage with NCC on ways to support their success in their management plans with this parcel.

(8.15.2.20) Claims made

Select from:

☒ No, we are not making any claims, and we do not plan to within the next two years

Row 5

(8.15.2.1) Landscape/jurisdiction ID

Select from:

☒ LJ4

(8.15.2.2) Name of initiative

Ontario Biodiversity Conservation and OECM Identification Initiative

(8.15.2.3) Country/area

Select from:

☒ Canada

(8.15.2.4) Latitude

51.850612

(8.15.2.5) Longitude

-87.132919

(8.15.2.6) Name of landscape or jurisdiction area

(8.15.2.8) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ Yes

(8.15.2.9) Area covered by the initiative (ha)

907230

(8.15.2.10) Type of engagement

Select all that apply

☒ Convener: Leads or facilitates the design, set-up, and high-level management of the initiative

☒ Implementer: Executes actions based on the collective goals

☒ Funder: Provides full or partial financial resources

(8.15.2.11) Engagement start year

2025

(8.15.2.12) Engagement end year

Select from:

☒ Not defined

(8.15.2.13) Estimated investment over the project period

50000

(8.15.2.14) Landscape goals supported by engagement

Environmental

☒ Biodiversity protected and/or restored

- ☒ Increased and/or maintained protected areas

Governance

- ☒ Promotion of transparency, participation, inclusion, and coordination in landscape policy, planning, and management

(8.15.2.15) Organization actions supporting initiative

Participate in planning and multi-stakeholder alignment

- ☒ Collaborate on establishing and managing monitoring system for biodiversity, habitat fragmentation and/or threats to IUCN Red List species in priority areas
- ☒ Collaborate on management/land use planning in the landscape/jurisdiction
- ☒ Collaborate to maintain representation from all relevant stakeholders within governance structure of initiative

Build community and multi-stakeholder capacities

- ☒ Engage stakeholders on importance of conservation, restoration and/or rehabilitation

(8.15.2.16) 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
- ☒ Private sector

(8.15.2.17) Description of engagement

As part of its commitment to sustainable forest management and biodiversity conservation in Northwestern Ontario, Domtar undertook a voluntary landscape-level initiative to identify candidate Other Effective Area-Based Conservation Measures (OECMs) within its managed forest areas. Building on more than 100 years of forest management experience in the region, the project sought to identify areas that provide long-term biodiversity conservation benefits while remaining compatible with sustainable forest management objectives. The initiative was developed through a collaborative process involving Indigenous rights holders, local citizen committees, NGOs and consultants. A Protected Area Advisory Team was established to guide the work and ensure that ecological, cultural, and social values were considered throughout the assessment process. The project strengthens biodiversity conservation at a landscape scale, contributes to habitat protection, carbon

storage, and ecosystem resilience, and demonstrates how sustainable forest management can support broader regional conservation objectives while maintaining working forest landscapes.

(8.15.2.18) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

☒ Yes, progress is collectively monitored using a shared external framework, please specify :Once confirmed, OECMs are incorporated into the forest management plan which is monitored by the Provincial Government

(8.15.2.19) State the achievements of your engagement so far and how progress is monitored

We continue to monitor the opportunity for engaging the provincial and federal governments of Canada on OECMs while respecting Indigenous rights holders. Domtar will also continue to implement this approach across our other forest management units in Ontario as resources allow. For example, we are currently exploring expansion of this approach to a second forest management unit.

(8.15.2.20) Claims made

Select from:

☒ No, we are not making any claims, and we do not plan to within the next two years

Row 6

(8.15.2.1) Landscape/jurisdiction ID

Select from:

☒ LJ5

(8.15.2.2) Name of initiative

Domtar and Tla'amin Nation Historic tiskwat Land Agreement

(8.15.2.3) Country/area

Select from:

☒ Canada

(8.15.2.4) Latitude

49.943434

(8.15.2.5) Longitude

-124.605675

(8.15.2.6) Name of landscape or jurisdiction area

tiskwat British Columbia

(8.15.2.8) Indicate if you can provide the size of the area covered by the initiative

Select from:

☒ Yes

(8.15.2.9) Area covered by the initiative (ha)

50

(8.15.2.10) Type of engagement

Select all that apply

☒ 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

(8.15.2.11) Engagement start year

2024

(8.15.2.12) Engagement end year

Select from:

☒ Please specify :12/31/2026

(8.15.2.13) Estimated investment over the project period

1

(8.15.2.14) Landscape goals supported by engagement

Social

- ☒ Ensuring local communities and smallholders benefit from the outcomes of landscape/jurisdictional initiative
- ☒ Improved capacity for community engagement in multi-stakeholder processes
- ☒ Respect, protect, and fulfil human rights
- ☒ Rights to land and resources recognized and protected, and related conflicts reduced

(8.15.2.15) 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 to maintain representation from all relevant stakeholders within governance structure of initiative

Support and incentivize sustainable production and community land use practices

- ☒ Support Indigenous peoples and local communities to clarify and secure land tenure rights

(8.15.2.16) Type of partners engaged in the initiative design and implementation

Select all that apply

- ☒ Sub-national government
- ☒ Indigenous peoples
- ☒ Private sector

(8.15.2.17) Description of engagement

Domtar engaged with the Tla'amin Nation to support the return of culturally significant lands at the former Paper Mill site in Powell River, British Columbia. The engagement was grounded in relationship building, mutual respect, and reconciliation, and reflects Domtar's commitment to values-based engagement with Indigenous Peoples. The collaboration was the result of several years of dialogue, learning, and negotiation between Domtar and the Tla'amin Nation. The relationship-building process began in 2021 with the renaming of the mill site from Powell River Paper Mill to tiskwat, recognizing the site's historical and contemporary significance to the Tla'amin people. Following the mill's closure, both parties continued to work collaboratively to identify a path that would enable the Nation to reacquire lands within its traditional territory while supporting long-term community interests. Through this engagement, Domtar worked directly with Tla'amin Nation leadership and representatives, local municipalities and other private sector stakeholders to develop a land agreement that balanced cultural, social, and economic considerations. The process required ongoing discussions, negotiation, and shared decision-making to reach an outcome acceptable to all parties. Domtar's role included dedicating resources and leadership attention to the negotiations and maintaining a long-term commitment to the process even when discussions became complex. The agreement demonstrates how collaborative engagement can advance Indigenous rights, strengthen relationships, and contribute to reconciliation while supporting sustainable outcomes for local communities. In addition to facilitating the return of a significant portion of the former mill lands, the agreement also supports future economic opportunities in the broader Powell River region through planned redevelopment of remaining industrial lands.

(8.15.2.18) Collective monitoring framework used to measure progress towards landscape goals and actions

Select from:

☒ Yes, progress is monitored using an internally defined framework

(8.15.2.19) State the achievements of your engagement so far and how progress is monitored

In March 2025, Domtar and the Tla'amin Nation successfully signed the historic tiskwat Land Agreement, achieving a significant milestone in the Nation's efforts to reconnect with and reacquire lands of deep cultural and historical importance. Through the agreement, a substantial portion of the former tiskwat Paper Mill site will return to Tla'amin Nation ownership. The agreement reflects years of collaboration and demonstrates the effectiveness of sustained engagement, relationship building, and shared commitment between Domtar and Indigenous rights-holders. Domtar views the agreement as a tangible example of putting reconciliation commitments into action by supporting Indigenous access to lands within their traditional territory. Progress toward this outcome was monitored through ongoing engagement between Domtar and Tla'amin Nation representatives over multiple years. Key indicators of progress included maintaining active dialogue, advancing negotiations, achieving interim milestones such as the 2021 renaming of the mill site to tiskwat, and ultimately concluding and signing the formal land agreement. Success was measured by the ability of both parties to reach a mutually acceptable agreement that supports Tla'amin Nation objectives while also considering broader community economic interests. The formal execution of the agreement serves as the primary evidence of achievement and demonstrates that the engagement objectives were successfully met. Domtar will continue to monitor implementation through ongoing relationship management and coordination associated with the transfer and future stewardship of the lands.

(8.15.2.20) Claims made

Select from:

☒ No, we are not making any claims, and we do not plan to within 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

3

Row 3

(8.15.3.1) Landscape/jurisdiction ID

Select from:

☒ LJ3

(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:

☒ No, we do not produce/source from this landscape/jurisdiction

Row 4

(8.15.3.1) Landscape/jurisdiction ID

Select from:

☒ LJ4

(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

3

[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. - 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 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 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

☒ 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 6

(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

Expected benefits of project

☒ Compliance with regulation

☒ 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)

3860190

(8.17.1.10) Project area in the target year (Hectares)

3860190

(8.17.1.11) Country/Area

Select from:

☒ Canada

(8.17.1.14) Monitoring frequency

Select from:

☒ Annually

(8.17.1.15) Total investment over the project period (currency)

37062892

(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.

Row 4

(8.17.1.1) Project reference

Select from:

☒ Project 2

(8.17.1.2) Project type

Select from:

☒ Forest ecosystem restoration

(8.17.1.3) Expected benefits of project

Expected benefits of project

☒ Disaster risk reduction

☒ 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.

(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)

21562682

(8.17.1.10) Project area in the target year (Hectares)

21562682

(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

☒ Disaster risk reduction

☒ 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. Investments and costs related to this work are costs of harvesting and operations above and beyond what was planned.

Row 5

(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

Expected benefits of project

- ☒ Disaster risk reduction
- ☒ 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 uses prescribed burning as a sustainable forest management tool to reduce wildfire risk, restore natural disturbance processes, and enhance forest regeneration. Prescribed burns are carefully planned and conducted under specific weather, fuel, and site conditions to safely reduce accumulated forest fuels while supporting ecosystem health. A notable example occurred following a severe tornado event that created significant fuel buildup across portions of a managed forest landscape. To address the increased wildfire hazard, Domtar implemented a prescribed burning program that treated more than 600 hectares of affected forest. The treatment reduced fine fuels, such as grasses, needles, leaves, and small woody debris, by approximately 70-100%, while reducing heavier fuels, including larger woody material and slash, by an estimated 40-70%. By reducing fuel loads, the project lowered the potential intensity and spread of future wildfires, helping protect forest ecosystems, nearby communities, and forestry infrastructure. At the same time, prescribed fire helped prepare seedbeds, recycle nutrients, control competing vegetation, and promote the regeneration of fire-adapted forest species. These outcomes support long-term forest resilience and improve the ability of forests to recover from natural disturbances. Through these targeted fuel management activities, Domtar is helping build more resilient forest landscapes that are better able to withstand future disturbances, support biodiversity, and continue providing ecological, social, and economic benefits over the long term.

(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

2025

(8.17.1.8) Target year

Select from:

☒ Indefinitely

(8.17.1.9) Project area to date (Hectares)

600

(8.17.1.10) Project area in the target year (Hectares)

600

(8.17.1.11) Country/Area

Select from:

☒ Canada

(8.17.1.14) Monitoring frequency

Select from:

☒ Annually

(8.17.1.15) Total investment over the project period (currency)

245000

(8.17.1.16) For which of your expected benefits are you monitoring progress?

Select all that apply

☒ Disaster risk reduction

☒ Restoration of natural ecosystem(s)

(8.17.1.17) Please explain

For the recent post-tornado fuel management project, monitoring confirmed substantial reductions in hazardous fuel loads, including approximately 70-100% reduction in fine fuels and 40-70% reduction in heavy fuels across more than 600 hectares. These results are used to evaluate changes in wildfire risk and inform future fuel management strategies. Funding for the project was 50/50 investment between Domtar's contribution from the Forest Renewal Trust and the Forestry

Future's Trust. Forest regeneration and ecosystem recovery are monitored through periodic surveys that assess seedling establishment, species composition, vegetation competition, and overall stand development. Monitoring helps determine whether prescribed fire has successfully created favorable seedbed conditions, promoted desired regeneration, and supported the recovery of fire-adapted forest ecosystems.

Row 6

(8.17.1.1) Project reference

Select from:

☒ Project 4

(8.17.1.2) Project type

Select from:

☒ Threatened and protected species

(8.17.1.3) Expected benefits of project

Expected benefits of project

☒ Improvement to sustainability of production practices

☒ Reduce/halt biodiversity loss

(8.17.1.4) Is this project originating any carbon credits?

Select from:

☒ No

(8.17.1.5) Description of project

Domtar participated in the Boreal Avian Modelling (BAM) Pileated Woodpecker Project, a collaborative research initiative aimed at identifying silvicultural systems and forest management strategies that reconcile sustainable timber harvesting with the conservation of boreal landscapes. The project focused on the Pileated Woodpecker, a keystone species whose nesting and foraging requirements are closely associated with large, mature trees, deadwood, and other structural features commonly found in older forests. Because many other wildlife species depend on cavities created by Pileated Woodpeckers, conserving suitable habitat for this species can generate broader biodiversity benefits across managed forest ecosystems. The initiative brought together researchers and forest management experts from the Université du Québec en Abitibi-Témiscamingue (UQAT), Université Laval, Université du Québec à Montréal (UQAM), Université du Québec à Chicoutimi

(UQAC), Quebec's Ministry of Natural Resources and Forests (MRNF), Environment and Climate Change Canada (ECCC), Natural Resources Canada (NRCan), the Norwegian Institute of Bioeconomy Research (NIBIO), and Quebec's Sustainable Forestry Initiative Implementation Committee. Research activities evaluated habitat characteristics associated with nesting and occupancy, with the objective of identifying practical approaches for retaining key habitat features within actively managed forests. Findings from the project improved understanding of how forest harvesting practices can be adapted to maintain ecological functions linked to old-growth habitat while supporting long-term sustainable forest management objectives. A key outcome of the project was the development of a field guide designed to help forest managers, planners, and operational staff identify potential Pileated Woodpecker nesting habitat in the field. The guide supports the protection of important habitat features during forest management planning and harvesting operations, enabling more informed conservation decisions at the stand level. By integrating scientific research into operational forestry practices, the project contributes to biodiversity conservation, helps maintain habitat for a keystone species, and supports the retention of old-growth forest attributes within working forest landscapes.

(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

2025

(8.17.1.8) Target year

Select from:

☒ 2025

(8.17.1.9) Project area to date (Hectares)

1854662

(8.17.1.10) Project area in the target year (Hectares)

1854662

(8.17.1.11) Country/Area

Select from:

☒ Canada

(8.17.1.14) Monitoring frequency

Select from:

☒ Annually

(8.17.1.15) Total investment over the project period (currency)

10000

(8.17.1.16) For which of your expected benefits are you monitoring progress?

Select all that apply

☒ Improvement to sustainability of production practice

(8.17.1.17) Please explain

The primary outcome of this project was the development and distribution of a field guide to help forest managers, planners, and operational staff identify potential Pileated Woodpecker nesting habitat and retain important old-growth forest attributes during forest management activities. As the project's role is focused on knowledge transfer rather than direct habitat monitoring, success is primarily measured through the adoption and use of the field guide within forest management planning and operational processes. Domtar promotes the guide to forestry professionals and contractors and encourages its use during harvest planning, site assessments, and habitat retention decision-making.

Row 7

(8.17.1.1) Project reference

Select from:

☒ Project 5

(8.17.1.2) Project type

Select from:

☒ Forest ecosystem restoration

(8.17.1.3) Expected benefits of project

Expected benefits of project

- ☒ Carbon credits gained
- ☒ Creation of green jobs and sustainable livelihoods
- ☒ Increase in carbon sequestration
- ☒ More inclusive, transparent, and empowering governance processes
- ☒ Protection of land tenure

(8.17.1.4) Is this project originating any carbon credits?

Select from:

- ☒ No

(8.17.1.5) Description of project

Domtar supported First 30x30, an Indigenous-led initiative that helps First Nations evaluate and pursue nature-based climate solutions that support long-term stewardship of lands and waters. Through this investment, First 30x30 worked directly with Indigenous Nations to conduct Market Opportunity Assessments (MOAs), providing technical analysis, planning support, carbon finance expertise, and decision-support tools to evaluate opportunities for conservation, restoration, and sustainable land management. The project focused on identifying pathways for Indigenous Nations to generate long-term, sustainable revenue streams that can support land stewardship, conservation, restoration activities, and Indigenous Guardian programs. Assessments completed during the reporting period covered more than 242,000 hectares of land and evaluated opportunities for Improved Forest Management carbon projects that reduce emissions and enhance carbon storage while maintaining Indigenous leadership and decision-making authority. Expected benefits include increased carbon sequestration and avoided greenhouse gas emissions through the protection and improved management of forest ecosystems, particularly old-growth forests, salmon-bearing watersheds, and other ecologically significant landscapes. Across the areas assessed, the project identified the potential to generate approximately 16.7 million tCO₂e of emissions reductions and removals over project lifetimes. The initiative also supports the creation of sustainable livelihoods by enabling Indigenous Nations to access carbon finance markets and generate long-term revenue that can be reinvested in stewardship programs, monitoring activities, Indigenous Guardian employment, cultural revitalization initiatives, and land management capacity. In addition to climate benefits, the project is expected to deliver biodiversity conservation, protection of species at risk, improved watershed and salmon habitat health, and greater long-term protection of ecologically and culturally important landscapes through Indigenous-led stewardship approaches.

(8.17.1.6) Where is the project taking place in relation to your value chain?

Select all that apply

- ☒ Project based in sourcing area(s)
- ☒ Project based elsewhere

(8.17.1.7) Start year

2024

(8.17.1.8) Target year

Select from:

☒ 2025

(8.17.1.9) Project area to date (Hectares)

242000

(8.17.1.10) Project area in the target year (Hectares)

242000

(8.17.1.11) Country/Area

Select from:

☒ Canada

(8.17.1.14) Monitoring frequency

Select from:

☒ Six-monthly or more frequently

(8.17.1.15) Total investment over the project period (currency)

136000

(8.17.1.16) For which of your expected benefits are you monitoring progress?

Select all that apply

☒ Carbon credits gained

- ☑ Creation of green jobs and sustainable livelihoods
- ☑ Increase in carbon sequestration

(8.17.1.17) Please explain

During the reporting period, Domtar's funding enabled First 30x30 to complete three Market Opportunity Assessments and associated project concept notes, with additional assessments underway. These assessments evaluated 242,261 hectares and identified significant opportunities for Indigenous-led conservation, restoration, and carbon finance initiatives. Collectively, the assessments estimated the potential for approximately 16.7 million tCO₂e in emissions reductions and removals and over CAD \$609 million in potential net project revenue over 25 years, subject to project development and implementation. The project advanced planning for multiple Indigenous stewardship initiatives. Expected co-benefits identified through the assessments include biodiversity conservation, protection of old-growth forests and salmon habitat, Indigenous Guardian jobs, cultural revitalization, and increased Indigenous participation in land stewardship and governance. Progress is monitored through a structured assessment framework that evaluates project area, carbon mitigation potential, projected financial returns, development costs, stewardship benefits, implementation readiness, and Indigenous community priorities. First 30x30 also tracks project-specific indicators such as hectares assessed, estimated emissions reductions, revenue potential, identified biodiversity benefits, and recommended next steps for implementation. To strengthen consistency and accountability, the program developed an eligibility framework, recommendation rubric, financial scenario model, knowledge resources, and standardized operating procedures. These tools support rigorous project evaluation, informed decision-making, and ongoing tracking of environmental, financial, and community outcomes as projects advance from assessment to feasibility and implementation. Ongoing engagement with participating Nations provides additional oversight to ensure projects align with Indigenous stewardship objectives and community priorities.

[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, packaging 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 offices, 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.

(9.1.1.4) Primary reason why data is not collected and/or reported

Select from:

☒ Other, please specify :The operations excluded represent an insignificant proportion of total water use.

(9.1.1.7) Country/area and river basin of exclusion

Zimbabwe

☒ Other, please specify :Domtar's wood products facilities are primarily located in Quebec, Canada, with several located in Ontario, Canada, and three in the US. Our wood products facilities withdraw water from municipal sources and not directly from natural water basins.

(9.1.1.8) Estimated volume of water the exclusion represents (megaliters)

631

(9.1.1.9) Estimated % of total water

0.1

(9.1.1.10) 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 631,000 cubic meters for all 22 wood products operations; approximately 0.1% 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. In 2025, 94.24% of water withdrawn 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 2025.

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 2025.

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 selfgenerated.

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)

492689

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Lower

(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 2025, 92.44% of the water we drew was returned to the environment, while the remaining 7.56% 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)

455454

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Lower

(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 2025, 92.44% of the water we drew was returned to the environment, while the remaining 7.56% 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)

37235

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Lower

(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 2025, 92.44% of the water we drew was returned to the environment, while the remaining 7.56% 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)

92895

(9.2.4.3) Comparison with previous reporting year

Select from:

☒ Lower

(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:

☒ About the same

(9.2.4.6) Primary reason for forecast

Select from:

☒ Increase/decrease in business activity

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

18.85

(9.2.4.8) Identification tool

Identification tool used

☒ WRI Aqueduct

☒ WWF Water Risk Filter

(9.2.4.9) Please explain

According to our latest assessment, conducted using the WRI Aqueduct tool in July 2026, 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)

464291

(9.2.7.3) Comparison with previous reporting year

Select from:

☒ Lower

(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 (94.24%) 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)

28072

(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 renewable groundwater, including our Hawesville (Kentucky), Sanford (Florida), and West Carrollton (Ohio) facilities. 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)

326

(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. 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)

362869

(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

In 2025, 92.44% of the water we drew was returned to the environment, while the remaining 7.56% 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.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters)

89221

(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

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)

411

(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. Wastewater transferred to municipalities undergoes additional treatment by the receiving municipal wastewater treatment facilities before final discharge to the environment.

[Fixed row]

(9.2.9) Indicate the highest level to which your wastewater is treated (either by your organization or a third party) before being discharged to the environment.

Quaternary treatment

(9.2.9.1) Volume (megaliters)

0

(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.

Tertiary treatment

(9.2.9.1) Volume (megaliters)

0

(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.

Secondary treatment

(9.2.9.1) Volume (megaliters)

452502

(9.2.9.2) Comparison of treated volume with previous reporting year

Select from:

☒ Lower

(9.2.9.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.9.4) % of discharge volume treated in compliance with local regulatory standards

Select from:

☒ 100

(9.2.9.5) Factors considered in determining appropriate treatment level beyond local regulatory standards

Select all that apply

☒ Internally developed water quality standards or guidelines

☒ Sector-specific standards

☒ Profile of the receiving waterbody

☒ The water discharge impacts

(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. Less than 0.1% (411 megaliters) 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. Wastewater transferred to municipalities undergoes additional treatment by the receiving municipal wastewater treatment facilities before final discharge to the environment.

Primary treatment only

(9.2.9.1) Volume (megaliters)

0

(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.

No treatment

(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. Less than 0.1% (411 megaliters) 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. Wastewater transferred to municipalities undergoes additional treatment by the receiving municipal wastewater treatment facilities before final discharge to the environment.

Unknown

(9.2.9.1) Volume (megaliters)

0

(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)

1332

(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. Not all mills monitor total nitrogen and total phosphorus. Consequently, the figures reported in this submission reflect data only from facilities that conduct testing for these parameters. Discharges from Paper and Packaging manufacturing operations: Total nitrogen: 740.37 metric tons. Total phosphorus: 157.69 metric tons. Discharges from Pulp manufacturing operations: Total nitrogen: 294.50 metric tons. Total phosphorous: 96.93 metric tons. Discharges from Tissue operations: Total nitrogen: 15.54 metric tons. Total phosphorous: 26.93 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 substantive 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 2026, 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 substantive 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)

40055

(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

40055

(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)

38148

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

(9.3.1.23) Discharges to fresh surface water

38148

(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)

1907

(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 2026, 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% 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 8% 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)

37045

(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

37045

(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)

35281

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

(9.3.1.23) Discharges to fresh surface water

35281

(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)

(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 2026, 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% 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 8% 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)**

Rothschild

(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)

15477

(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

15477

(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)

14740

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

14740

(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)

737

(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 2026, 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% 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 8% 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)

50

(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

33

(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

17

(9.3.1.21) Total water discharges at this facility (megaliters)

46

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

(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

46

(9.3.1.27) Total water consumption at this facility (megaliters)

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 2026, 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% 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 8% 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)

268

(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

268

(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)

96

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(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

(9.3.1.26) Discharges to third party destinations

96

(9.3.1.27) Total water consumption at this facility (megaliters)

172

(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 2026, 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% 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 8% 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 withdrawal 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 withdrawal 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 withdrawal 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 withdrawal 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 withdrawal 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)

7381000000

(9.5.2) Total water withdrawal efficiency

14981.05

(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 (m3/denominator)

4.14

(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 (m3/denominator)

50.34

(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 (m3/denominator)

54.49

(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: ☒ No	<i>Domtar's pulp, paper, tissue, packaging, and wood products are not classified as hazardous by any regulatory authority.</i>

[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) Value chain stage where low water impact is assessed

Select all that apply

☒ Direct operations

(9.14.3) Indicator used to assess water impact

Water quantity

☒ Lower water withdrawal/consumption than conventional processes

☒ Other water quantity indicator used, please specify :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% of the water we withdraw is returned to the environment.

(9.14.4) Have you used a certification standard to classify your products/services as low water impact?

Select from:

☒ No

(9.14.5) 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 3.1.1 of this disclosure.

(9.14.7) 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% of the water we withdraw is returned to the environment. The remaining 8% 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) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

Water pollution

(9.15.1) Target set in this category

Select from:

☒ No, and we do not plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

☒ Other, please specify :Water pollution is monitored and managed through established treatment and compliance programs.

(9.15.4) Explain why you do not have a target set in this category

Water pollution is managed through facility-level treatment, monitoring and regulatory compliance programs rather than through a company-wide quantitative target. Treatment plant performance is continuously monitored using key parameters such as biochemical oxygen demand (BOD5), and effluent discharges are tracked and reported in accordance with applicable regulatory requirements. Non-contact cooling water that does not mix with process effluent may be returned without treatment, but it is monitored, sampled and reported to regulatory authorities. These established controls and monitoring processes are used to manage water pollution risks and performance across our operations.

Water withdrawals

(9.15.1) Target set in this category

Select from:

☒ Yes

(9.15.2) Science-based target set in this target category according to SBTN guidance

Select from:

☒ No, and we do not plan to in the next two years

Water, Sanitation, and Hygiene (WASH) services

(9.15.1) Target set in this category

Select from:

☒ No, and we do not plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

☒ Other, please specify :Issue already addressed through existing practices and no material gap identified.

(9.15.4) Explain why you do not have a target set in this category

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) Target set in this category

Select from:

☒ Yes

[Fixed row]

(9.15.1) Provide details of your water-related targets and the progress made.

Row 1

(9.15.1.1) Target reference number

Select from:

☒ Water target 1

(9.15.1.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.1.3) Category of target & Quantitative metric

Product water intensity

☒ Reduction per unit of production

(9.15.1.4) Date target was set

11/30/2022

(9.15.1.5) End date of base year

12/31/2020

(9.15.1.6) Base year figure

84.5

(9.15.1.7) End date of target year

12/31/2030

(9.15.1.8) Target year figure

67.6

(9.15.1.9) Reporting year figure

81.1

(9.15.1.10) Target status in reporting year

Select from:

☒ Underway

(9.15.1.11) % of target achieved relative to base year

20

(9.15.1.12) Global environmental treaties/initiatives/frameworks aligned with or supported by this target

Global environmental treaties/initiatives/frameworks aligned with or supported by this target

☒ Other, please specify :United Nations Sustainable Development Goal 12

(9.15.1.13) Explain target coverage and identify any exclusions

This target is specifically for our Paper and Packaging business unit, target is set for 2030.

(9.15.1.14) 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

(9.15.1.18) Further details of target

As part of the Sustainability Strategy developed between 2023 and 2025 and publicly announced in May 2025, Domtar established a water resilience objective to strengthen operational water stewardship and reduce reliance on freshwater resources. One of our targets is to reduce water use intensity in the Paper and Packaging business unit by 20% by 2030 against a 2020 baseline. While the baseline year remains fixed, baseline and target values may be adjusted to reflect acquisitions, divestitures, or changes in business unit composition. To achieve this target, Domtar focuses on reducing freshwater intake, increasing the reuse and recycling of process water, and identifying opportunities to improve water efficiency across operations. These efforts support long-term water resilience while maintaining alignment with the company's water stewardship objectives. In 2025, water use intensity decreased from 84.5 m³/salable metric ton in the baseline year to 81.1 m³/salable metric ton, representing a 3.4% reduction toward our 67.6 m³/salable metric ton 2030 target. This improvement was achieved despite market-related downtime during the reporting year. While downtime can reduce overall water consumption, it can also increase water intensity because certain water requirements remain during idled operations. The reduction achieved in 2025 therefore demonstrates continued progress toward the target under challenging operating conditions.

Row 2

(9.15.1.1) Target reference number

Select from:

☒ Water target 2

(9.15.1.2) Target coverage

Select from:

☒ Organization-wide (direct operations only)

(9.15.1.3) Category of target & Quantitative metric

Other

☒ Other, please specify :Ensure 100% of facilities have water-related risk mitigation plans.

(9.15.1.4) Date target was set

12/30/2024

(9.15.1.5) End date of base year

11/18/2025

(9.15.1.6) Base year figure

0

(9.15.1.7) End date of target year

12/31/2030

(9.15.1.8) Target year figure

100

(9.15.1.9) Reporting year figure

33

(9.15.1.10) Target status in reporting year

Select from:

☒ Underway

(9.15.1.11) % of target achieved relative to base year

33

(9.15.1.12) Global environmental treaties/initiatives/frameworks aligned with or supported by this target

Global environmental treaties/initiatives/frameworks aligned with or supported by this target

☒ Other, please specify :United Nations Sustainable Development Goal 12

(9.15.1.13) 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.

(9.15.1.14) 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. 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.

(9.15.1.18) 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]

C10. Environmental performance - Plastics

(10.1) Do you have plastics-related targets?

(10.1.1) Targets in place

Select from:

☒ No, and we do not plan to within the next two years

(10.1.2) Primary reason for not having a plastics-related target

Select from:

☒ Important but not an immediate business priority

(10.1.3) Explain why you did not have an active plastics-related target in the reporting year

Domtar did not have an active corporate plastics-related target because its exposure to plastics is considered low relative to other environmental issues, and most products are made from renewable and biodegradable wood fibre. Plastic use is primarily associated with product packaging, with higher use in some tissue operations where facility-level reduction targets may apply. Domtar nevertheless maintains reduction initiatives and anticipates reducing plastic use in its Paper and Packaging business by approximately 30% through improvements to paper ream wrap, including recyclable packaging structures where applicable. Domtar also offers recyclable fibre-based alternatives to single-use plastics. As its understanding and measurement of plastics-related impacts develop, including potential microplastics from recycled fibre inputs, Domtar will consider appropriate corporate-level targets in the future.

[Fixed row]

(10.2) Indicate whether your organization engages in the following activities.

Production/commercialization of plastic polymers (including plastic converters)

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Domtar does not produce plastic polymers.

Production/commercialization of durable plastic goods and/or components (including mixed materials)

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Domtar does not produce or commercialize durable plastic goods and/or other mixed plastic components.

Usage of durable plastics goods and/or components (including mixed materials)

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Domtar does not produce, commercialize, or materially use durable plastic goods or components as part of its products or core business activities. The company's operations are focused primarily on the manufacture of fiber-based paper, packaging, pulp, tissue and wood products derived from renewable wood fiber. Plastic-related activities are largely limited to certain packaging applications used for product protection, storage and transportation.

Production/commercialization of plastic packaging

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Domtar does not produce or commercialize plastic packaging. Its packaging products are fibre-based, including recycled linerboard and corrugating medium.

Usage of plastic packaging

(10.2.1) Activity applies

Select from:

☒ Yes

(10.2.2) Usage of plastic packaging

Select all that apply

☒ Provision of services that use plastic packaging (e.g. food services)

☒ Other, please specify :Domtar uses reusable plastic components in operations and logistics, including roll-protection materials, pallets, totes and containers. These items are reused where feasible before replacement.

(10.2.3) Please explain

The company uses plastic packaging primarily for product protection, storage, and transportation.

Provision of waste management

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

Domtar is not a provider of waste management.

Other plastics-related activities not specified

(10.2.1) Activity applies

Select from:

☒ No

(10.2.3) Please explain

No other plastic-related activities to report.

[Fixed row]

(10.5) Provide the total weight of plastic packaging sold and/or used and indicate the raw material content.

(10.5.12) Please explain

Domtar uses plastic packaging primarily as a packaging material for finished products sold to customers and as stretch film for palletized shipments. The company does not currently consolidate the weight or raw material composition of plastic packaging across all business units and operations; therefore, company-wide data is not available for reporting. Domtar continues to advance packaging sustainability initiatives, including reducing plastic use in paper ream wrap and transitioning to more recyclable packaging structures where applicable, while evaluating opportunities to strengthen plastics-related data collection and reporting.

[Fixed row]

(10.5.1) Specify the packaging formats across your organization's packaging portfolio and their proportions.

(10.5.1.1) Packaging formats in packaging portfolio

Select from:

☒ PE flexible (b2b): pallet wrap

Row 2

(10.5.1.1) Packaging formats in packaging portfolio

Select from:

☒ Industrially and home-compostable plastics – rigids and flexibles

Row 3

(10.5.1.1) Packaging formats in packaging portfolio

Select from:

☒ Other flexibles (incl. multimaterial), please specify :To be determined in subsequent disclosures

[Add row]

(10.5.2) Is any of your packaging designed in compliance with design for recycling and/or composting guidelines?

(10.5.2.1) Is any of your packaging designed in compliance with design for recycling and/or composting guidelines?

Select from:

☒ No

(10.5.2.7) Primary reason for not designing your plastic packaging in compliance with design for recycling and/or composting guidelines

Select all that apply

☒ Not an immediate strategic priority

(10.5.2.8) Please explain

Domtar is pursuing initiatives to improve packaging sustainability, including reducing plastic use and transitioning to more recyclable packaging structures where applicable. However, the company does not currently assess plastic packaging against formal design-for-recycling or compostability guidelines at the enterprise level.
[Fixed row]

(10.5.3) Indicate the reusability and recyclability of the plastic packaging you sold and/or used.

(10.5.3.1) Percentages available to report

Percentage not available

☒ None

(10.5.3.5) Please explain

Domtar does not currently use reusable plastic packaging systems. Product packaging becomes part of the finished product sold to customers, while stretch film remains with the pallet during distribution.

[Fixed row]

(10.5.4) Provide the proportion of product delivered through reuse models.

(10.5.4.1) % total product delivered through reuse systems

Select from:

☒ Unknown

[Fixed 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
	Select from: ☒ Yes, we use indicators	Select all that apply ☒ State and benefit indicators

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
		☒ Pressure indicators ☒ 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)
	2025 Sustainability Report	Domtar-Sustainability-Report_2026.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 to facilitate collective action in priority basins.

Select from:

☒ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute

