



Modern Slavery Act Compliance Report (Canada)
For the Financial Year Ending December 31, 2025

Reporting Entities:

- Rayonier A.M. Canada GP
- Rayonier A.M. Canada Industries Inc.
- RYAM Canada Holdings

Sector: Manufacturing – Pulp and Paper

Date of Submission: May 31, 2026

Authorized Signatory: R. Colby Slaughter

1. Structure, Activities, and Supply Chains

Rayonier Advanced Materials Inc. (RYAM) is a global leader in cellulose-based technologies, with its core operations in North America and Europe. The Canadian entities listed above are integral to the company's production and distribution of sustainable wood-derived biomaterials. RYAM's Canadian operations are focused on the manufacture of high-yield pulp (HYP), and paperboard products used in pharmaceuticals, personal care, textiles, packaging, industrial applications, and more.

As part of RYAM's broader global structure, the Canadian operations are supported by forestry and fiber procurement networks and rely on both domestic and international suppliers. This includes the sourcing of timber, chemicals, machinery, packaging materials, and logistics providers across multiple countries, some of which may present elevated risks for labor violations or mainly North America.

About the Témiscaming Plant

- Specializes in High-Yield Pulp (HYP), and Coated Paperboard production.
- Powers operations primarily through carbon-neutral hydroelectricity and renewable biomass.
- Supports over 500 employees, emphasizing community engagement and Indigenous consultation.

Supply Chain Model

Role	Interaction with RYAM Facility
Wood Suppliers	Deliver FSC® and PEFC™-certified hardwood fiber from Québec and Ontario working forests.
Chemical & Material Suppliers	Provide chemicals and materials critical to production, sourced locally and internationally.

Service Providers	Offer on-site services like maintenance and repairs under strict labor and safety compliance.
RYAM Temiscaming Operations	Manufacture sustainable products through closed-loop processes, recycling byproducts, and supplying green energy to Hydro-Québec.

2. Governance

RYAM's governance approach is rooted in our four core values — **Integrity, Accountability, Quality, and People** — and guided by our cultural cornerstones: **Safety, Continuous Improvement, Customer Centricity, and Innovation**. These values form the ethical foundation for all operations, from board oversight to supplier conduct.

We maintain comprehensive governance systems to prevent forced labor, child labor, and human rights abuses throughout our operations and global supply chain. Our governance framework includes:

- **RYAM Code of Conduct**, which outlines ethical behavior expectations for employees, contractors, and partners. It emphasizes lawful conduct, respect for individuals, and the importance of reporting unethical practices without fear of retaliation.
- **Corporate Human Rights Policy**, aligned with international standards such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines, and ILO Conventions. This policy mandates human dignity and fair labor across all operations.
- **Supplier Code of Conduct**, which extends our expectations to business partners, including explicit prohibitions against child labor, forced labor, harassment, and unsafe working conditions.
- **Sustainable Forestry Policy**, which incorporates human rights due diligence into forest management, including stakeholder engagement, legal compliance, ecosystem diversity, and third-party certifications (FSC®, PEFC™). It reinforces our respect for human rights across fiber sourcing practices.
- **Ethics and Compliance Hotline and Reporting Mechanisms**, including Integrity Counts for U.S. and international ethics reporting (accessible by phone and online submission), together with an internal Ombudsman process for anonymous internal and external complaints, provide accessible channels for reporting concerns related to labor practices, human rights, and other Code violations.
- **Annual Ethics and Human Rights Training**, required for all employees, with specialized onboarding and continued education to identify, prevent, and escalate modern slavery risks.

The Supplier Code of Conduct, Corporate Human Rights Policy and Sustainable Forestry Policy are publicly available on RYAM's website.

Our Enterprise Risk Management Committee, which includes senior executives and reports to the Audit Committee of the Board of Directors, oversees legal compliance and the implementation of governance systems. These mechanisms ensure that modern slavery and human rights considerations are embedded into the Company's operations, procurement, and decision-making at all levels.

3. Due Diligence and Risk Management

RYAM conducts robust due diligence activities to prevent forced labor, child labor, and other human rights abuses in its operations and supply chains. Key elements of our due diligence program include:

- **Supplier Sustainability Surveys** and ESG risk assessments, conducted regularly to evaluate supplier practices related to labor, human rights, and environmental sustainability.
- **Mandatory Supplier Code of Conduct compliance**, which explicitly prohibits forced labor, child labor, harassment, and unsafe working conditions.
- **Third-party certifications** for sustainable wood sourcing (e.g., FSC®, PEFC™), ensuring traceability and ethical procurement standards.
- **On-site supplier audits and inspections** to verify compliance with RYAM's human rights and sustainability expectations.
- **Ethics reporting mechanisms** are available to employees and external stakeholders through Integrity Counts (for U.S. and international reports, by phone or online submission) and through an internal Ombudsman process for anonymous complaints.
- **Inclusion of human rights obligations in contractual Terms and Conditions of Purchase**, requiring suppliers to:
 - Comply with all applicable laws and labor standards.
 - Adhere to the Supplier Code of Conduct, regardless of the local legal environment.
 - Accept immediate termination of contracts in cases of violations.
- **Termination rights** for suppliers who fail to comply with RYAM's ethical and legal expectations regarding labor practices.

Through these integrated policies, contractual requirements, monitoring practices, and grievance mechanisms, RYAM strives to uphold the highest standards of human rights and mitigate risks of modern slavery and child labor across its global supply chain.

4. Identified Risks

At this time, RYAM has not identified any immediate or significant risks of forced labor or child labor within its direct operations or first-tier supply chain. The majority of RYAM's suppliers and service providers are based in Canada and the United States, countries with strong labor laws and enforcement frameworks.

Our procurement strategy focuses primarily on sourcing materials and services from first-tier suppliers with established compliance programs. We require suppliers to comply with all applicable labor standards, including those prohibiting forced labor and child labor, through our contractual agreements and Supplier Code of Conduct.

Nevertheless, RYAM remains vigilant and proactive by:

- Monitoring for emerging risks through supplier engagement and ESG assessments.
 - Periodically reassessing its supply chain to identify any potential future vulnerabilities.
 - Continuing to require compliance certifications and audit rights to ensure alignment with our human rights and ethical sourcing expectations.
-

5. Actions Taken During the 2025 Reporting Year

- Maintained employee and management human rights training.
 - Continued conducting enhanced supplier assessments.
 - Continued integrating sustainability and labor compliance into all new supplier contracts.
 - Provided training focused on Human Rights including forced and child labor to all employees in Procurement team.
-

6. Employee Training

RYAM is committed to fostering a culture grounded in human rights, respect, and ethical behavior. This commitment is reflected in our training programs, which are designed to promote awareness, strengthen accountability, and reinforce the Company's core values — Integrity, Accountability, Quality, and People — across all levels of the organization.

To ensure our teams are equipped to recognize, prevent, and respond to risks related to forced labor and child labor, RYAM provides:

- **Mandatory annual ethics and human rights training** for all employees, emphasizing the recognition and prevention of modern slavery, and reinforcing ethical decision-making.

- **Onboarding programs** that integrate awareness of labor rights, RYAM's human rights policies, and the importance of upholding ethical standards from day one.
- **Internal training tracking mechanisms** are used to support timely completion of training and to monitor overall employee compliance.
- **Leadership training modules** focused on cultivating ethical workplace environments and ensuring that human rights considerations are embedded into management practices.

These programs are tailored to elevate team-wide understanding of labor rights risks and to empower all employees to act in alignment with RYAM's policies, Supplier Code of Conduct, and legal obligations. The training also promotes the proper use of the Ethics Hotline to report any concerns regarding labor violations or unethical conduct.

By building continuous awareness through education and engagement, RYAM actively supports a workplace culture that protects human dignity and upholds its obligations under the Canadian Modern Slavery Act.

7. Assessing Effectiveness

RYAM evaluates the effectiveness of its modern slavery and child labor prevention efforts through a combination of training metrics, internal governance reporting, and contract-based compliance mechanisms. While RYAM is not currently conducting regular audits of its suppliers, it reserves the right to initiate such audits should any risk indicators or compliance concerns arise.

The following tools and processes help assess and strengthen our approach:

- **Training Completion Rates:** RYAM tracks employee completion of mandatory ethics and human rights training through its internal learning and compliance systems. High completion rates are viewed as a key indicator of workforce awareness and policy reinforcement.
- **Hotline Activity Monitoring:** RYAM monitors reports received through its ethics reporting channels, including Integrity Counts and the Ombudsman process, and investigates labor-related concerns thoroughly and confidentially.
- **Review of Supplier Responses:** Through Supplier Sustainability Surveys and the onboarding process, RYAM assesses suppliers' stated policies and practices regarding labor and human rights. These reviews help flag any potential compliance gaps.
- **Contractual Safeguards:** RYAM's Terms and Conditions of Purchase and Supplier Code of Conduct incorporate binding requirements that prohibit forced labor and child labor, ensuring RYAM has clear legal mechanisms for recourse and enforcement.
- **Governance Oversight:** The Sustainability Council and Enterprise Risk Management Committee regularly review program implementation and

recommend improvements. These bodies escalate findings and progress updates to the Board of Directors.

RYAM remains committed to ongoing evaluation and continuous improvement. As part of our effectiveness review process, we remain aligned with evolving legal standards and best practices for responsible sourcing.

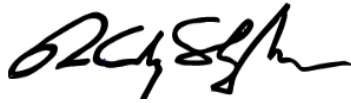
8. Approval and Attestation

This report has been approved by the governing bodies of each reporting entity and signed by an authorized director.

Name: R. Colby Slaughter

Title: Senior Vice President, General Counsel & Corporate Secretary

Signature:

A handwritten signature in black ink, appearing to read 'RCS', followed by a stylized flourish.

Date: May 29, 2026
