California Transparency In Supply Chains Act

The California Transparency in Supply Chains Act of 2010 requires manufacturers and others that do business in California to publicly disclose their efforts to eradicate slavery and human trafficking from their direct supply chains. Because most of our raw materials are sourced in North America, and the majority of our manufacturing activities are conducted in North America, LP believes the risk of slavery or human trafficking in our supply chain to be low. Nonetheless we have a variety of mechanisms in place to assess and reduce these risks in our supply chain.

At Louisiana-Pacific Corporation, we are proudly committed to the highest level of legal and ethical standards in conducting our business around the world. LP recognizes that the United States Government and the governments of other countries in which we operate have laws, regulations, and policies which control the import and export of products, human trafficking and slavery, anti-corruption, bribery, extortion, kickbacks or other matters which are applicable to LP’s business activities. LP’s Code of Business Conduct and Ethics mandates that every employee, officer, director and persons authorized to conduct business for or on its behalf, fully comply with these laws when not in conflict with US laws. See LP’s Code of Business Conduct and Ethics.

**Expectations of our Suppliers**

LP’s master purchasing agreements and purchase orders require suppliers to comply with all federal, state and local laws rules, regulations and standards. Our more recent versions of the master purchasing agreements specifically refer to compliance with laws relating to human trafficking and slavery, among others. LP considers the suppliers signature on this agreement as certification that the supplier is in compliance with the terms and conditions of the agreement including compliance with all federal state and local rules including laws relating to human trafficking and slavery.

LP has audit rights in many of its supply contracts that give us the right to monitor our suppliers operations for compliance with applicable laws and regulations. LP’s Corporate Quality policy relating to raw materials allows for Supplier Quality Audits to review a supplier’s ability to meet agreed-to specifications and any requirements internal to LP. While these audits have not had an intentional focus on human trafficking and slavery, in these contracts, we reserve the right to investigate a vendor’s compliance with all federal, state and local laws rules, regulations and standards and have reserved the right to require the supplier or vendor to certify in writing their compliance with all laws.
LP’s terms and conditions for both US, Canada and International require all suppliers and vendors to comply with all federal, state and local laws. The more recent versions of the terms and conditions specifically refer to compliance with laws relating to human trafficking and slavery among others. LP also specifically reserves the right to demand the supplier certify in writing compliance with all applicable federal, state and local laws, rules, regulations and standards upon request.

**Third party Forestry Management, Fiber Sourcing and Chain of Custody Certification**

All of LP’s North American manufacturing facilities are certified and managed to Sustainable Forestry Initiative (“SFI”) management and Fiber Sourcing Standards. The SFI Management Standards contain fifteen objectives that apply to organizations that own or manage forestlands including Objective 9, which requires program participants to take appropriate steps to comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures and prevailing wages. The SFI Fiber Sourcing Standards contain thirteen objectives relevant to fiber procurement organizations including Objective 13 which requires program participants to avoid controversial sources and encourage socially sound practices by avoiding fiber sourcing from countries without effective laws addressing the workers’ health and safety; fair labor practices; Indigenous Peoples’ rights; anti-discrimination and anti-harassment measures; and prevailing wages and workers right to organize.

In addition, LP has added dual SFI and PEFC chain-of-custody certification programs to all of our Engineered Wood Products mills and some of our Siding and OSB mills. The chain of custody standard is an accounting system that tracks forest fiber content through production and manufacturing to the end product. This program requires a due diligence program that avoids forest based products from controversial sources. Controversial sources include forest activities which are not in compliance with applicable state, provincial or federal laws as they relate to labor regulations relating to forest workers and fiber sourced from areas without effective social laws.

The SFI 2015-2019 Standards and Rules require yearly third-party independent certification audits by competent and accredited certification bodies for all three certifications - forest management, fiber sourcing and chain-of-custody. All certification bodies must be accredited by a member of the International Accreditation Forum.

**Awareness**

LP’s Risk Management Counsel regularly conducts an assessment of risks that affect the Company’s management of financial and business risks. Among the areas of assessment are risks relating labor and employment laws, compliance with all federal, state and local laws rules, regulations and standards compliance and risks involved in LP products being produced, treated or finished by third parties. Based on these assessments, LP believes the risk of slavery, human trafficking and other employment abuses to be low.
LP’s Code of Business Conduct and Ethics is an important part of LP’s overall compliance program. It is intended to promote lawful and ethical behavior by everyone engaged in LP business. LP’s employees are encouraged to support ethical behavior everywhere within the workplace. Those under our Code have an obligation to let someone know if you see or hear of actions that violate this Code and have a duty to report any concern that they think may be unethical or a violation of company policy or legal requirements.

Salaried employees are required to annually review, assess and report, in writing a Business Ethics Questionnaire (“BEQ”). A series of questions asks that employees confirm compliance with specific ethical requirements and/or report if they are aware of potential conflicts of interest or non-compliance with the law. The BEQ specifically asks whether one is aware of any illegal activities related to human trafficking and slavery that have not been reported. All employees receiving the questionnaire are required to respond based on their first-hand knowledge and to do so promptly, accurately, and completely. Failure to do so will result in disciplinary action.

In addition, the Company’s hotline, LP Confidential, that may be used for reporting concerns about practices which may be illegal or improper. Information about the hotline is posted in all of our facilities and is available to all employees.

Training

LP regularly trains our employees in the standard of ethical behavior, policies, procedures and legal requirements that define the way we do business. In 2015, LP conducted companywide training on LP’s Code of Business Conduct.

In order to maintain its SFI certification LP is required to require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI Forestry Management Standard and Fiber Sourcing Standard. This training is provided and documented annually.