

GRI DISCLOSURE INDEX



STATEMENT OF USE

Mercer International Inc. has reported the information cited in this Global Reporting Initiative (GRI) content index for the period January 1, 2022 to December 31, 2022 with reference to the GRI Standards.

GRI 1 USED

GRI 1: FOUNDATION 2021

REFERENCES

2022 MERCER INTERNATIONAL INC. SUSTAINABILITY REPORT

- *referred to as SR*

2022 MERCER INTERNATIONAL INC. 10K REPORT

- *referred to as 10K*

2023 MERCER INTERNATIONAL INC. SCHEDULE 14A PROXY CIRCULAR

- *referred to as PC*

MERCER INTERNATIONAL GUIDELINES AND POLICIES

- *referred to individually*

GRI 2: General Disclosures 2021

DISCLOSURE & REPORTING REQUIREMENTS

2-1: Organizational details

The organization shall:

- a. report its legal name;
- b. report its nature of ownership and legal form;
- c. report the location of its headquarters;
- d. report its countries of operation.

LOCATION AND DETAILS

10K: [Pages 3 - 7](#)

SR: [Pages 12 - 15](#)

- a. Mercer International Inc. (Mercer)
- b. Mercer is a corporation organized under the laws of the State of Washington whose common stock is quoted and listed for trading on the NASDAQ Global Select Market (MERC).
- c. Vancouver, BC, Canada
- d. Mercer operates four pulp mills, including two NBSK mills in Eastern Germany and one NBSK mill and one “swing” kraft mill in Western Canada which produces both NBSK and NBHK. Mercer's solid wood segment consists of the manufacture, sale and distribution of lumber, manufactured products (including CLT and finger joint lumber), wood pallets, electricity, biofuels and wood residuals from our sawmills and other facilities located in Germany and the United States.

DISCLOSURE & REPORTING REQUIREMENTS

2-2: Entities included in the organization's sustainability reporting

The organization shall:

a. list all its entities included in its sustainability reporting;

b. if the organization has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting;

c. if the organization consists of multiple entities, explain the approach used for consolidating the information, including:

- i. whether the approach involves adjustments to information for minority interests;
- ii. how the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities;
- iii. whether and how the approach differs across the disclosures in this Standard and across material topics.

GRI 2: GENERAL DISCLOSURES

LOCATION AND DETAILS

10K: [Pages 3 - 7](#)

SR: [Pages 12 - 15](#)

a. The principal operating subsidiaries included in Mercer's Sustainability Report include its four pulp mills in Canada and Germany:

Mercer Celgar Limited Partnership

Mercer Peace River Pulp Ltd

Mercer Stendal GmbH (formerly Zellstoff Stendal GmbH)

Mercer Rosenthal GmbH (formerly Zellstoff-und Papierfabrik Rosenthal GmbH)

The following entities are included in select sections of the Sustainability Report:

Mercer Timber Products GmbH

Mercer Mass Timber LLC

Alpha Santanol Pty Ltd

Mercer Torgau GmbH & Co. KG

b. N/A

c. N/A

DISCLOSURE & REPORTING REQUIREMENTS

2-3 Reporting period, frequency and contact point

The organization shall:

- a. specify the reporting period for, and the frequency of, its sustainability reporting;
- b. specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this;
- c. report the publication date of the report or reported information;
- d. specify the contact point for questions about the report or reported information.

2-4 Restatements of information

The organization shall:

- a. report restatements of information made from previous reporting periods and explain:
 - i. the reasons for the restatements;
 - ii. the effect of the restatements.

LOCATION AND DETAILS

- a. The reporting period for Mercer's sustainability reporting is January 1, 2022 to December 31, 2022. Mercer's sustainability reporting is completed annually.
- b. The reporting period for Mercer's financial reporting is January 1, 2022 to December 31, 2022. This is in line with Mercer's sustainability reporting.
- c. The publication date of Mercer's sustainability report is May 30, 2023 for the 2022 fiscal year.
- d. Bill Adams, Vice President, Sustainability & Innovation

i. Total Waste to Landfill and Total Water Withdrawal intensity values for 2018-2021 were restated due to changes in methodology.

ii. Total Waste to Landfill intensity was reduced by 2.32, 2.27, 2.73 and 3.57 kg/ADMT for 2018, 2019, 2020 and 2021 respectively.

Total Water Withdrawal was increased by 1.22, 1.48, 0.83 and 1.90 m³/ADMT for 2018, 2019, 2020 and 2021 respectively.

DISCLOSURE & REPORTING REQUIREMENTS

2-5 External assurance

The organization shall:

a. describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved;

b. if the organization's sustainability reporting has been externally assured:

i. provide a link or reference to the external assurance report(s) or assurance statement(s);

ii. describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;

iii. describe the relationship between the organization and the assurance provider.

LOCATION AND DETAILS

SR: Pages 102 - 103

a. PricewaterhouseCoopers LLP (PWC) performed a limited assurance engagement of select sustainability indicators, included in the Appendix (the "Subject Matter") for the reporting periods indicated, based on the criteria, also set forth in the Appendix (the "Criteria"). Mercer's management is responsible for the Subject Matter, based on the Criteria.

i. Refer to SR - Pages 102-103

ii. Limited assurance has been obtained by PWC on select sustainability indicators, conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) in AT-C section 105, Concepts Common to All Attestation Engagements, and AT-C section 210, Review Engagements, and standards established by the International Auditing and Assurance Standards Board (IAASB) in International Standard on Assurance Engagements (ISAE) 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

iii. PWC is required to be independent and to meet other ethical responsibilities in accordance with relevant ethical requirements related to the engagement. Additionally, PWC is required to be independent and to meet our other ethical responsibilities in accordance with the Code of Professional Conduct issued by the AICPA and as per ISAE 3000.

DISCLOSURE & REPORTING REQUIREMENTS

2-6 Activities, value chain and other business relationships

The organization shall:

- a. report the sector(s) in which it is active;
- b. describe its value chain, including:
 - i. the organization's activities, products, services, and markets served;
 - ii. the organization's supply chain;
 - iii. the entities downstream from the organization and their activities;
- c. report other relevant business relationships;
- d. describe significant changes in 2-6-a, 2-6-b, and 2-6-c compared to the previous reporting period.

LOCATION AND DETAILS

10K: Pages 3 - 7, 17 - 19

- a. Mercer operates in the forest products sector
- b. Mercer's activities include the manufacture, sale and distribution of pulp, electricity and chemicals at our pulp mills and the the manufacture, sale and distribution of lumber, manufactured products (including CLT and finger joint lumber), wood pallets, electricity, biofuels and wood residuals from our sawmills and other facilities. We serve customers in Europe, Asia and North America. Mercer has a global supply chain network with operations located close to fiber sources and key global end-user markets. Pulp and solid wood products are transported generally by rail, ocean carrier and truck through third-party carriers.
- c. Mercer works with many third-party suppliers, manufacturers, and contractors throughout its supply chain that support various business activities and operations.
- d. N/A no significant changes

DISCLOSURE & REPORTING REQUIREMENTS

2-7 Employees

The organization shall:

- a. report the total number of employees, and a breakdown of this total by gender and by region;
- b. report the total number of:
 - i. permanent employees, and a breakdown by gender and by region;
 - ii. temporary employees, and a breakdown by gender and by region;
 - iii. non-guaranteed hours employees, and a breakdown by gender and by region;
 - iv. full-time employees, and a breakdown by gender and by region;
 - v. part-time employees, and a breakdown by gender and by region;
- c. describe the methodologies and assumptions used to compile the data, including whether the numbers are reported:
 - i. in headcount, full-time equivalent (FTE), or using another methodology;
 - ii. at the end of the reporting period, as an average across the reporting period, or using another methodology;
- d. report contextual information necessary to understand the data reported under 2-7-a and 2-7-b;
- e. describe significant fluctuations in the number of employees during the reporting period and between reporting periods.

GRI 2: GENERAL DISCLOSURES

LOCATION AND DETAILS

10K: [Pages 24 - 25](#)

SR: [Pages 12 - 13, 62 - 63, 67 - 69](#)

- a-b. Refer to the pages 24-25 of the 10K and pages 12-13, 62-63 and 67-69 of the SR
- c. Total number of employees was based on headcount as at December 31, 2022
- d. Refer to the pages 24-25 of the 10K and pages 12-13, 62-63 and 67-69 of the SR
- e. The increase in the number of employees between December 31, 2021 and December 31, 2022 is due to the acquisition of HIT Holzindustrie Torgau GmbH & Co. KG (now Mercer Torgau GmbH & Co. KG) on September 30, 2022

DISCLOSURE & REPORTING REQUIREMENTS

2-9 Governance structure and composition

The organization shall:

- a. describe its governance structure, including committees of the highest governance body;
- b. list the committees of the highest governance body that are responsible for decision making on and overseeing the management of the organization's impacts on the economy, environment, and people;
- c. describe the composition of the highest governance body and its committees by:
 - i. executive and non-executive members;
 - ii. independence;
 - iii. tenure of members on the governance body;
 - iv. number of other significant positions and commitments held by each member, and the nature of the commitments;
 - v. gender;
 - vi. under-represented social groups;
 - vii. competencies relevant to the impacts of the organization;
 - viii. stakeholder representation.

LOCATION AND DETAILS

PC: Pages 14 - 23

Corporate Governance Guidelines

a - c. The present standing committees of the Board are the:

- Audit Committee
- Compensation and Human Resources Committee
- Governance and Nominating Committee
- Environmental, Health and Safety Committee

The composition of the Board and its committees is outlined in pages 14 - 23 of the PC and the Corporate Governance Guidelines.

DISCLOSURE & REPORTING REQUIREMENTS

2-10 Nomination and selection of the highest governance body

The organization shall:

- a. describe the nomination and selection processes for the highest governance body and its committees;
- b. describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration:
 - i. views of stakeholders (including shareholders);
 - ii. diversity;
 - iii. independence;
 - iv. competencies relevant to the impacts of the organization.

2-11 Chair of the highest governance body

The organization shall:

- a. report whether the chair of the highest governance body is also a senior executive in the organization;
- b. if the chair is also a senior executive, explain their function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated.

LOCATION AND DETAILS

PC: [Pages 30 - 32](#)

10K: [Page 72](#)

- a. Jimmy S.H. Lee serves as Executive Chairman of the Board and is not a senior executive.
- b. N/A

DISCLOSURE & REPORTING REQUIREMENTS

2-12 Role of the highest governance body in overseeing the management of impacts

The organization shall:

a. describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development;

b. describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people, including:

- i. whether and how the highest governance body engages with stakeholders to support these processes;
- ii. how the highest governance body considers the outcomes of these processes;
- iii. describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review.

LOCATION AND DETAILS

PC: Pages 14 - 17, 28

a. PC - Pages 14 - 17

b. PC - Page 28

DISCLOSURE & REPORTING REQUIREMENTS

2-13 Delegation of responsibility for managing impacts

The organization shall:

- a. describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people, including:
 - i. whether it has appointed any senior executives with responsibility for the management of impacts;
 - ii. whether it has delegated responsibility for the management of impacts to other employees;
- b. describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people.

2-14 Role of the highest governance body in sustainability reporting

The organization shall:

- a. report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, and if so, describe the process for reviewing and approving the information;
- b. if the highest governance body is not responsible for reviewing and approving the reported information, including the organization's material topics, explain the reason for this.

LOCATION AND DETAILS

PC: Pages 14 - 17

The executive management team and Mercer's Board of Directors reviewed the 2022 Sustainability Report.

DISCLOSURE & REPORTING REQUIREMENTS

2-15 Conflicts of interest

The organization shall:

- a. report whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts of interest relating to:
 - i. cross-board membership;
 - ii. cross-shareholding with suppliers and other stakeholders;
 - iii. existence of controlling shareholders;
 - iv. related parties, their relationships, transactions, and outstanding balances.

2-16 Communication of critical concerns

The organization shall:

- a. describe whether and how critical concerns are communicated to the highest governance body;
- b. report the total number and the nature of critical concerns that were communicated to the highest governance body during the reporting period.

2-17 Collective knowledge of the highest governance body

The organization shall:

- a. report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development.

LOCATION AND DETAILS

PC: Pages 15 - 16

Corporate Governance Guidelines: Page 18

Code of Business Conduct and Ethics

Mercer Corporate Governance Guidelines (PC - Page 15; Governance Web Page - Governance Guidelines)

Mercer Code of Business Conduct and Ethics (PC - Page 15; Governance Web Page - Code of Business Conduct and Ethics)

PC: Pages 15 - 16, 35

Corporate Governance Guidelines: Page 9, 17

Whistleblower Policy

PC: Pages 11 - 12, 32 - 33

DISCLOSURE & REPORTING REQUIREMENTS

2-18 Evaluation of the performance of the highest governance body

The organization shall:

- a. describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people;
- b. report whether the evaluations are independent or not, and the frequency of the evaluations;
- c. describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices.

2-19 Remuneration policies

The organization shall:

- a. describe the remuneration policies for members of the highest governance body and senior executives, including:
 - i. fixed pay and variable pay;
 - ii. sign-on bonuses or recruitment incentive payments;
 - iii. termination payments;
 - iv. clawbacks;
 - v. retirement benefits;
- b. describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people.

GRI 2: GENERAL DISCLOSURES

LOCATION AND DETAILS

PC: Page 33

Code of Business Conduct and Ethics: Page 8

Evaluations of the Board of Directors are conducted annually with the assistance of the lead independent director and the Governance and Nominating Committee.

PC: Pages 16, 37 - 39, 43 - 59, 78 - 82
Clawback Policy

- i. PC - Pages 37-39
- ii. PC - Pages 46-48
- iii. PC - Pages 78-82
- iv. Clawback Policy (Mercer Website); PC - Page 16, 58-59
- v. PC - Pages 43-59

PC - Pages 43 - 45

GRI 2 cont.

DISCLOSURE & REPORTING REQUIREMENTS

2-20 Process to determine remuneration

The organization shall:

- a. describe the process for designing its remuneration policies and for determining remuneration, including:
 - i. whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration;
 - ii. how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration;
 - iii. whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives;
- b. report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable.

LOCATION AND DETAILS

PC: Pages 45 - 70

DISCLOSURE & REPORTING REQUIREMENTS

2-21 Annual total compensation ratio

The organization shall:

- a. report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual);
- b. report the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual);
- c. report contextual information necessary to understand the data and how the data has been compiled.

2-22 Statement on sustainable development strategy

The organization shall:

- a. report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development.

LOCATION AND DETAILS

PC: [Page 85](#)

a-c. The ratio of the annual total compensation of the highest-paid individual (Mr. Bueno) to the median of the annual total compensation of all employees was estimated to be 89 to 1. This is based on the below information and the methodology outlined on page 85 of the PC

- the annual total compensation of the employee identified at median of our Company (other than Mr. Bueno), was \$61,991; and
- the annual total compensation of Mr. Bueno for purposes of determining the pay ratio was \$5,525,129.

SR: [Pages 4 - 5](#)

10K: [Pages 7, 27 - 28](#)

DISCLOSURE & REPORTING REQUIREMENTS

2-23 Policy commitments

The organization shall:

- a. describe its policy commitments for responsible business conduct, including:
 - i. the authoritative intergovernmental instruments that the commitments reference;
 - ii. whether the commitments stipulate conducting due diligence;
 - iii. whether the commitments stipulate applying the precautionary principle;
 - iv. whether the commitments stipulate respecting human rights;
- b. describe its specific policy commitment to respect human rights, including:
 - i. the internationally recognized human rights that the commitment covers;
 - ii. the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment;
- c. provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this;
- d. report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level;
- e. report the extent to which the policy commitments apply to the organization's activities and to its business relationships;
- f. describe how the policy commitments are communicated to workers, business partners, and other relevant parties.

GRI 2: GENERAL DISCLOSURES

LOCATION AND DETAILS

Anti-Corruption Policy

Code of Business Conduct and Ethics

Corporate Governance Guidelines

Human Rights Policy

Mercer's policy commitments are approved by the Board of Directors, representing the senior-most level. The policy commitments apply to all of Mercer's organizational and business activities and relationships.

Policy commitments are communicated to employees and stakeholders through the onboarding process and are available publicly through the company website. Annually, certain policies including the Anti-Corruption Policy and the Code of Business Conduct and Ethics Policy require review and sign-off by all employees.

GRI 2 cont.

DISCLOSURE & REPORTING REQUIREMENTS

2-26 Mechanisms for seeking advice and raising concerns

The organization shall:

- a. describe the mechanisms for individuals to:
 - i. seek advice on implementing the organization's policies and practices for responsible business conduct;
 - ii. raise concerns about the organization's business conduct.

LOCATION AND DETAILS

PC: [Page 35](#)

Code of Business Conduct and Ethics: [Page 13](#)

Mercer has adopted measures to ensure that employees and other internal and external parties are afforded multiple avenues to communicate, and/or report concerns and complaints, including on an anonymous or confidential basis, while being protected from retaliation. Anonymous reports of Improper Activities can be made by through our Integrity Hotline, which is independently administered by EthicsPoint.

DISCLOSURE & REPORTING REQUIREMENTS

2-27 Compliance with laws and regulations

The organization shall:

a. report the total number of significant instances of non-compliance with laws and regulations during the reporting period, and a breakdown of this total by:

- i. instances for which fines were incurred;
- ii. instances for which non-monetary sanctions were incurred;

b. report the total number and the monetary value of fines for instances of noncompliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by:

- i. fines for instances of non-compliance with laws and regulations that occurred in the current reporting period;
- ii. fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods;

c. describe the significant instances of non-compliance;

d. describe how it has determined significant instances of non-compliance.

2-28 Membership associations

The organization shall:

a. report industry associations, other membership associations, and national or international advocacy organizations in which it participates in a significant role.

LOCATION AND DETAILS

a-d. N/A - There were no significant instances of non-compliance with laws and regulations during the reporting period.

SR: Pages 98 - 99

DISCLOSURE & REPORTING REQUIREMENTS

2-29 Approach to stakeholder engagement

The organization shall:

- a. describe its approach to engaging with stakeholders, including:
 - i. the categories of stakeholders it engages with, and how they are identified;
 - ii. the purpose of the stakeholder engagement;
 - iii. how the organization seeks to ensure meaningful engagement with stakeholders.

LOCATION AND DETAILS

SR: [Pages 3, 85 - 93](#)

10K: [Pages 27 - 28](#)

Mercer recognizes that engaging with stakeholders is key to making informed business decisions, enhancing enterprise value, and maintaining strong relationships with our various stakeholders and communities in which we operate. We spend considerable time with stakeholders and Indigenous Peoples to expand our relationships in all areas of our business. We conduct a materiality assessment every two years to identify, prioritize and ensure meaningful engagement with relevant stakeholders and groups. The following internal and external stakeholder groups were identified through this process:

- Suppliers
- Customers
- Investors and Shareholders
- Indigenous Peoples
- Prospective Employees
- Press and Media
- Employees/Unions/Families
- Local Communities
- Governments and Regulators
- Competitors
- ENGOs and NGOs
- Trade Associations

GRI 2 cont.

DISCLOSURE & REPORTING REQUIREMENTS

2-30 Collective bargaining agreements

The organization shall:

- a. report the percentage of total employees covered by collective bargaining agreements;
- b. for employees not covered by collective bargaining agreements, report whether the organization determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organizations.

LOCATION AND DETAILS

10K: Pages 24 - 25

GRI 3: Material Topics 2021

DISCLOSURE & REPORTING REQUIREMENTS

3-1 Process to determine material topics

The organization shall:

- a. describe the process it has followed to determine its material topics, including:
 - i. how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships;
 - ii. how it has prioritized the impacts for reporting based on their significance;
- b. specify the stakeholders and experts whose views have informed the process of determining its material topics.

LOCATION AND DETAILS

SR: [Page 3](#)

- a. Mercer conducts a materiality assessment every two years to identify and prioritize the most material topics for internal and external stakeholders. The results of the materiality assessment are evaluated to determine actual and potential, negative and positive impacts.

Mercer applies double materiality to prioritize impacts for reporting based on the significance of impacts to Mercer's enterprise value, and to stakeholders, including society and the environment.

- b. Mercer's materiality assessment was informed through sources representing stakeholder views. These sources included supplier, customer and investor questionnaires, investor discussions, employee engagement surveys, customer interviews, dialogue with governments and regulators, and engagement with local communities. Through this process, we identified the views of the following key stakeholder groups:

- Customers and Suppliers
- Investors and Shareholders
- Indigenous Peoples
- Prospective Employees
- Press and Media
- Employees/Unions/Families
- Local Communities
- Governments and Regulators
- Competitors
- ENGOs and NGOs
- Trade Associations

DISCLOSURE & REPORTING REQUIREMENTS

3-2 List of material topics

The organization shall:

a. list its material topics;

b. report changes to the list of material topics compared to the previous reporting period.

LOCATION AND DETAILS

SR: [Page 3](#)

Mercer's 2022 material topics:

- Biodiversity
- Carbon Footprint
- Communication and Transparency
- Community Engagement and Contributions
- Competition for Raw Materials and Human Resources
- Compliance
- Diversity, Equity and Inclusion
- Employee Development and Training
- Environmental Impact
- Flexible Work and Work/Life Balance
- Forest Certification
- Health and Safety
- Indigenous Relations
- Labour Relations
- Participation in Trade Associations
- Product Sustainability
- Quality & Value
- Reliable Supplier
- Resource Efficiency
- Responsible Manufacturer
- Safe Products
- Sustainable Forest Management
- Taxes and Economic Contributions
- Water Usage

b. There were no significant changes as 2022 was an assessment review of the 2021 topics.

GRI 201: Economic Performance 2016

DISCLOSURE & REPORTING REQUIREMENTS

201-1 Direct economic value generated and distributed

The reporting organization shall report the following information:

a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:

- i. Direct economic value generated: revenues;
- ii. Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;
- iii. Economic value retained: 'direct economic value generated' less 'economic value distributed'.

b. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.

LOCATION AND DETAILS

10K: [Pages 82 - 119](#)

GRI 201 cont.

DISCLOSURE & REPORTING REQUIREMENTS

201-2 Financial implications and other risks and opportunities due to climate change

The reporting organization shall report the following information:

- a. Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue, or expenditure, including:
 - i. a description of the risk or opportunity and its classification as either physical, regulatory, or other;
 - ii. a description of the impact associated with the risk or opportunity;
 - iii. the financial implications of the risk or opportunity before action is taken;
 - iv. the methods used to manage the risk or opportunity;
 - v. the costs of actions taken to manage the risk or opportunity.

LOCATION AND DETAILS

10K: Pages 23 - 24, 27, 34 - 35

SR: Pages 30 - 33

DISCLOSURE & REPORTING REQUIREMENTS

201-3 Defined benefit plan obligations and other retirement plans

The reporting organization shall report the following information:

- a. If the plan's liabilities are met by the organization's general resources, the estimated value of those liabilities.
- b. If a separate fund exists to pay the plan's pension liabilities:
 - i. the extent to which the scheme's liabilities are estimated to be covered by the assets that have been set aside to meet them;
 - ii. the basis on which that estimate has been arrived at;
 - iii. when that estimate was made.
- c. If a fund set up to pay the plan's pension liabilities is not fully covered, explain the strategy, if any, adopted by the employer to work towards full coverage, and the timescale, if any, by which the employer hopes to achieve full coverage.
- d. Percentage of salary contributed by employee or employer.
- e. Level of participation in retirement plans, such as participation in mandatory or voluntary schemes, regional, or country-based schemes, or those with financial impact.

LOCATION AND DETAILS

10K: Pages 64 - 65, 101 - 106

DISCLOSURE & REPORTING REQUIREMENTS

201-4 Financial assistance received from government

The reporting organization shall report the following information:

a. Total monetary value of financial assistance received by the organization from any government during the reporting period, including:

i. tax relief and tax credits;

ii. subsidies;

iii. investment grants, research and development grants, and other relevant types of grant;

iv. awards;

v. royalty holidays;

vi. financial assistance from Export Credit Agencies (ECAs);

vii. financial incentives;

viii. other financial benefits received or receivable from any government for any operation.

b. The information in 201-4-a by country.

c. Whether, and the extent to which, any government is present in the shareholding structure

LOCATION AND DETAILS

10K: [Page 61](#)

a-b. In 2022, we received \$1.1 million in government grants to partially finance innovation and greenhouse gas emission reduction capital projects at our Canadian mills.

c. No government is present in Mercer's shareholding structure.

GRI 205: Anti-Corruption 2016

DISCLOSURE & REPORTING REQUIREMENTS

205-2 Communication and training about anti-corruption policies and procedures

The reporting organization shall report the following information:

- a. Total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region.
- b. Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region.
- c. Total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organization's anti-corruption policies and procedures have been communicated to any other persons or organizations.
- d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.
- e. Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.

LOCATION AND DETAILS

Anti-Corruption Policy

The Board has adopted a Code of Business Conduct and Ethics that applies to our directors, employees and executive officers and an Anti-Corruption Policy

GRI STANDARD

GRI 206: Anti-competitive Behavior 2016

DISCLOSURE & REPORTING REQUIREMENTS

206-1 Legal actions for anti-competitive behavior, antitrust, and monopoly practices

The reporting organization shall report the following information:

- a. Number of legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of antitrust and monopoly legislation in which the organization has been identified as a participant.
- b. Main outcomes of completed legal actions, including any decisions or judgments.

LOCATION AND DETAILS

10K: [Page 47](#)

GRI STANDARD

GRI 207: Tax 2019

DISCLOSURE & REPORTING REQUIREMENTS

207-1 Approach to tax

The reporting organization shall report the following information:

- a. A description of the approach to tax, including:
 - i. whether the organization has a tax strategy and, if so, a link to this strategy if publicly available;
 - ii. the governance body or executive-level position within the organization that formally reviews and approves the tax strategy, and the frequency of this review;
 - iii. the approach to regulatory compliance;
 - iv. how the approach to tax is linked to the business and sustainable development strategies of the organization.

LOCATION AND DETAILS

10K: Pages [65](#), [106 - 109](#)

DISCLOSURE & REPORTING REQUIREMENTS

207-2 Tax governance, control, and risk management

The reporting organization shall report the following information:

- a. A description of the tax governance and control framework, including:
 - i. the governance body or executive-level position within the organization accountable for compliance with the tax strategy;
 - ii. how the approach to tax is embedded within the organization;
 - iii. the approach to tax risks, including how risks are identified, managed, and monitored;
 - iv. how compliance with the tax governance and control framework is evaluated.
- b. A description of the mechanisms for reporting concerns about unethical or unlawful behavior and the organization's integrity in relation to tax.
- c. A description of the assurance process for disclosures on tax and, if applicable, a reference to the assurance report, statement, or opinion

LOCATION AND DETAILS

10K: Pages [65](#), [106 - 109](#)

DISCLOSURE & REPORTING REQUIREMENTS

207-4 Country-by-country reporting

The reporting organization shall report the following information:

- a. All tax jurisdictions where the entities included in the organization's audited consolidated financial statements, or in the financial information filed on public record, are resident for tax purposes.
- b. For each tax jurisdiction reported in Disclosure 207-4:
 - a:
 - i. Names of the resident entities;
 - ii. Primary activities of the organization;
 - iii. Number of employees, and the basis of calculation of this number;
 - iv. Revenues from third-party sales;
 - v. Revenues from intra-group transactions with other tax jurisdictions;
 - vi. Profit/loss before tax;
 - vii. Tangible assets other than cash and cash equivalents;
 - viii. Corporate income tax paid on a cash basis;
 - ix. Corporate income tax accrued on profit/loss;
 - x. Reasons for the difference between corporate income tax accrued on profit/loss and the tax due if the statutory tax rate is applied to profit/loss before tax.
 - c. The time period covered by the information reported in Disclosure 207-4.

LOCATION AND DETAILS

10K: Pages 65, 106 - 109

GRI 302: Energy 2016

DISCLOSURE & REPORTING REQUIREMENTS

302-1 Energy consumption within the organization

The reporting organization shall report the following information:

a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.

b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.

c. In joules, watt-hours or multiples, the total:

- i. electricity consumption
- ii. heating consumption
- iii. cooling consumption
- iv. steam consumption

d. In joules, watt-hours or multiples, the total:

- i. electricity sold
- ii. heating sold
- iii. cooling sold
- iv. steam sold

e. Total energy consumption within the organization, in joules or multiples.

f. Standards, methodologies, assumptions, and/or calculation tools used.

g. Source of the conversion factors used.

GRI 302: ENERGY

LOCATION AND DETAILS

SR: [Page 55](#)

DISCLOSURE & REPORTING REQUIREMENTS

302-3 Energy intensity

The reporting organization shall report the following information:

- a. Energy intensity ratio for the organization.
- b. Organization-specific metric (the denominator) chosen to calculate the ratio.
- c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all.
- d. Whether the ratio uses energy consumption within the organization, outside of it, or both

302-4 Reduction of energy consumption

The reporting organization shall report the following information:

- a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.
- b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.
- c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.
- d. Standards, methodologies, assumptions, and/or calculation tools used.

LOCATION AND DETAILS

SR: [Page 55](#)

SR: [Page 55](#)

GRI 303: Water and Effluents 2018

DISCLOSURE & REPORTING REQUIREMENTS

303-1 Interactions with water as a shared resource

The reporting organization shall report the following information:

- a. A description of how the organization interacts with water, including how and where water is withdrawn, consumed, and discharged, and the water-related impacts caused or contributed to, or directly linked to the organization's activities, products or services by a business relationship (e.g., impacts caused by runoff).
- b. A description of the approach used to identify water-related impacts, including the scope of assessments, their timeframe, and any tools or methodologies used.
- c. A description of how water-related impacts are addressed, including how the organization works with stakeholders to steward water as a shared resource, and how it engages with suppliers or customers with significant water-related impacts.
- d. An explanation of the process for setting any water-related goals and targets that are part of the organization's management approach, and how they relate to public policy and the local context of each area with water stress.

LOCATION AND DETAILS

SR: Pages [22 - 25](#), [51](#), [54](#)

GRI 303 cont.

DISCLOSURE & REPORTING REQUIREMENTS

303-2 Management of water discharge-related impacts

The reporting organization shall report the following information:

- a. A description of any minimum standards set for the quality of effluent discharge, and how these minimum standards were determined, including:
 - i. how standards for facilities operating in locations with no local discharge requirements were determined;
 - ii. any internally developed water quality standards or guidelines;
 - iii. any sector-specific standards considered;
 - iv. whether the profile of the receiving waterbody was considered.

LOCATION AND DETAILS

SR: Pages 22 - 23, 54

DISCLOSURE & REPORTING REQUIREMENTS

303-3 Water withdrawal

The reporting organization shall report the following information:

a. Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:

- i. Surface water;
- ii. Groundwater;
- iii. Seawater;
- iv. Produced water;
- v. Third-party water.

b. Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable:

- i. Surface water;
- ii. Groundwater;
- iii. Seawater;
- iv. Produced water;
- v. Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv.

c. A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories:

- i. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
- ii. Other water ($> 1,000$ mg/L Total Dissolved Solids).

d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

GRI 303: WATER EFFLUENT

LOCATION AND DETAILS

SR: [Page 54](#)

DISCLOSURE & REPORTING REQUIREMENTS

303-4 Water discharge

The reporting organization shall report the following information:

a. Total water discharge to all areas in megaliters, and a breakdown of this total by the following types of destination, if applicable:

- i. Surface water;
- ii. Groundwater;
- iii. Seawater;

iv. Third-party water, and the volume of this total sent for use to other organizations, if applicable.

b. A breakdown of total water discharge to all areas in megaliters by the following categories:

- i. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
- ii. Other water ($> 1,000$ mg/L Total Dissolved Solids).

c. Total water discharge to all areas with water stress in megaliters, and a breakdown of this total by the following categories:

- i. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids);
- ii. Other water ($> 1,000$ mg/L Total Dissolved Solids).

d. Priority substances of concern for which discharges are treated, including:

- i. how priority substances of concern were defined, and any international standard, authoritative list, or criteria used;
- ii. the approach for setting discharge limits for priority substances of concern;
- iii. number of incidents of non-compliance with discharge limits.

e. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

GRI 303: WATER EFFLUENT

LOCATION AND DETAILS

SR: [Page 54](#)

GRI 303 cont.

DISCLOSURE & REPORTING REQUIREMENTS

303-5 Water consumption

The reporting organization shall report the following information:

- a. Total water consumption from all areas in megaliters.
- b. Total water consumption from all areas with water stress in megaliters.
- c. Change in water storage in megaliters, if water storage has been identified as having a significant water-related impact.
- d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modeled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors.

LOCATION AND DETAILS

SR: Pages [51](#), [54](#)

GRI 304: Biodiversity 2016

DISCLOSURE & REPORTING REQUIREMENTS

304-2 Significant impacts of activities, products and services on biodiversity

The reporting organization shall report the following information:

- a. Nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following:
 - i. Construction or use of manufacturing plants, mines, and transport infrastructure;
 - ii. Pollution (introduction of substances that do not naturally occur in the habitat from point and nonpoint sources);
 - iii. Introduction of invasive species, pests, and pathogens;
 - iv. Reduction of species;
 - v. Habitat conversion;
 - vi. Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level).
- b. Significant direct and indirect positive and negative impacts with reference to the following:
 - i. Species affected;
 - ii. Extent of areas impacted;
 - iii. Duration of impacts;
 - iv. Reversibility or irreversibility of the impacts.

LOCATION AND DETAILS

SR: [Pages 74 - 79](#)

GRI 304 cont.

DISCLOSURE & REPORTING REQUIREMENTS

304-3 Habitats protected or restored

The reporting organization shall report the following information:

- a. Size and location of all habitat areas protected or restored, and whether the success of the restoration measure was or is approved by independent external professionals.
- b. Whether partnerships exist with third parties to protect or restore habitat areas distinct from where the organization has overseen and implemented restoration or protection measures.
- c. Status of each area based on its condition at the close of the reporting period.
- d. Standards, methodologies, and assumptions used.

LOCATION AND DETAILS

SR: Pages 76 - 77

GRI 305: Emissions 2016

DISCLOSURE & REPORTING REQUIREMENTS

305-1 Direct (Scope 1) GHG emissions

The reporting organization shall report the following information:

- a. Gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent.
- b. Gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.
- c. Biogenic CO2 emissions in metric tons of CO2 equivalent.
- d. Base year for the calculation, if applicable, including:
 - i. the rationale for choosing it;
 - ii. emissions in the base year;
 - iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f. Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g. Standards, methodologies, assumptions, and/or calculation tools used.

LOCATION AND DETAILS

SR: Pages [38 - 41](#), [103](#)

- a. Total Scope 1 emissions were 449,876 tonnes of CO2e.
- b. CO2, CH4, N2O
- c. Total 2022 Biogenic emissions were 4,216,128 tonnes of CO2e.
- d. 2019

DISCLOSURE & REPORTING REQUIREMENTS

305-2 Energy indirect (Scope 2) GHG emissions

The reporting organization shall report the following information:

- a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- c. If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- d. Base year for the calculation, if applicable, including:
 - i. the rationale for choosing it;
 - ii. emissions in the base year;
 - iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f. Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g. Standards, methodologies, assumptions, and/or calculation tools used.

LOCATION AND DETAILS

SR: Pages 38, 103

- a. 15,228 tonnes of CO₂e.

DISCLOSURE & REPORTING REQUIREMENTS

305-3 Other indirect (Scope 3) GHG emissions

The reporting organization shall report the following information:

- a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO₂ equivalent.
- b. If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent.
- d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.
- e. Base year for the calculation, if applicable, including:
 - i. the rationale for choosing it;
 - ii. emissions in the base year;
 - iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.
- f. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- g. Standards, methodologies, assumptions, and/or calculation tools used.

LOCATION AND DETAILS

SR: Pages [38](#), [103](#)

DISCLOSURE & REPORTING REQUIREMENTS

305-4 GHG emissions intensity

The reporting organization shall report the following information:

- a. GHG emissions intensity ratio for the organization.
- b. Organization-specific metric (the denominator) chosen to calculate the ratio.
- c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
- d. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.

305-7 Nitrogen oxides (NO_x), sulfur oxides (SO_x), and other significant air emissions

The reporting organization shall report the following information:

- a. Significant air emissions, in kilograms or multiples, for each of the following:
 - i. NO_x
 - ii. SO_x
 - iii. Persistent organic pollutants (POP)
 - iv. Volatile organic compounds (VOC)
 - v. Hazardous air pollutants (HAP)
 - vi. Particulate matter (PM)
 - vii. Other standard categories of air emissions identified in relevant regulations
- b. Source of the emission factors used.
- c. Standards, methodologies, assumptions, and/or calculation tools used.

LOCATION AND DETAILS

SR: [Page 41](#)

SR: [Pages 21, 53](#)

- i. SR - Page 21
- ii. SR - Page 21
- iii. N/A
- iv. N/A
- v. N/A
- vi. SR - Page 53
- vii. N/A

GRI 306: Waste 202

DISCLOSURE & REPORTING REQUIREMENTS

306-1 Waste generation and significant waste-related impacts

The reporting organization shall report the following information:

- a. For the organization's significant actual and potential waste-related impacts, a description of:
 - i. the inputs, activities, and outputs that lead or could lead to these impacts;
 - ii. whether these impacts relate to waste generated in the organization's own activities or to waste generated upstream or downstream in its value chain.

306-2 Management of significant waste-related impacts

The reporting organization shall report the following information:

- a. Actions, including circularity measures, taken to prevent waste generation in the organization's own activities and upstream and downstream in its value chain, and to manage significant impacts from waste generated.
- b. If the waste generated by the organization in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations.
- c. The processes used to collect and monitor waste-related data.

LOCATION AND DETAILS

SR: [Page 53](#)

SR: [Page 53](#)

GRI 306 cont.

DISCLOSURE & REPORTING REQUIREMENTS

306-3 Waste generated

The reporting organization shall report the following information:

- a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.
- b. Contextual information necessary to understand the data and how the data has been compiled.

LOCATION AND DETAILS

SR: [Page 53](#)

GRI 403: Occupational Health and Safety 2018

DISCLOSURE & REPORTING REQUIREMENTS

403-1 Occupational health and safety management system

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A statement of whether an occupational health and safety management system has been implemented, including whether:
 - i. the system has been implemented because of legal requirements and, if so, a list of the requirements;
 - ii. the system has been implemented based on recognized risk management and/or management system standards/guidelines and, if so, a list of the standards/guidelines.
- b. A description of the scope of workers, activities, and workplaces covered by the occupational health and safety management system, and an explanation of whether and, if so, why any workers, activities, or workplaces are not covered.

LOCATION AND DETAILS

SR: [Pages 60 - 61](#)

SR: [Pages 65 - 66](#)

[Health & Safety \(Mercer Website\)](#)

DISCLOSURE & REPORTING REQUIREMENTS

403-2 Hazard identification, risk assessment, and incident investigation

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks, including:
 - i. how the organization ensures the quality of these processes, including the competency of persons who carry them out;
 - ii. how the results of these processes are used to evaluate and continually improve the occupational health and safety management system.
- b. A description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals.
- c. A description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals.
- d. A description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system.

LOCATION AND DETAILS

SR: [Pages 60 - 61](#)

SR: [Pages 65 - 66](#)

[Health & Safety \(Mercer Website\)](#)

DISCLOSURE & REPORTING REQUIREMENTS

403-4 Worker participation, consultation, and communication on occupational health and safety

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

a. A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations.

403-5 Worker training on occupational health and safety

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

a. A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations.

LOCATION AND DETAILS

SR: [Pages 60 - 61](#)

SR: [Pages 65 - 66](#)

[Health & Safety \(Mercer Website\)](#)

SR: [Pages 60 - 61](#)

SR: [Pages 65 - 66](#)

[Health & Safety \(Mercer Website\)](#)

GRI 403 cont.

DISCLOSURE & REPORTING REQUIREMENTS

403-6 Promotion of worker health

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided.
- b. A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs.

LOCATION AND DETAILS

Health & Safety (Mercer Website)

DISCLOSURE & REPORTING REQUIREMENTS

403-9 Work-related injuries

The reporting organization shall report the following information:

- a. For all employees:
 - i. The number and rate of fatalities as a result of work-related injury;
 - ii. The number and rate of high-consequence work-related injuries (excluding fatalities);
 - iii. The number and rate of recordable work-related injuries;
 - iv. The main types of work-related injury;
 - v. The number of hours worked.
- b. For all workers who are not employees but whose work and/or workplace is controlled by the organization:
 - i. The number and rate of fatalities as a result of work-related injury;
 - ii. The number and rate of high-consequence work-related injuries (excluding fatalities);
 - iii. The number and rate of recordable work-related injuries;
 - iv. The main types of work-related injury;
 - v. The number of hours worked.
- c. The work-related hazards that pose a risk of high-consequence injury, including:
 - i. how these hazards have been determined;
 - ii. which of these hazards have caused or contributed to high-consequence injuries during the reporting period;
 - iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls.

LOCATION AND DETAILS

10K: [Pages 25 - 26](#)

SR: [Pages 60 - 61](#)

SR: [Page 66](#)

[Health & Safety \(Mercer Website\)](#)

GRI 403 cont.

DISCLOSURE & REPORTING REQUIREMENTS

403-9 Work-related injuries - cont.

d. Any actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls.

e. Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked.

f. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.

g. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

LOCATION AND DETAILS

10K: [Pages 25 - 26](#)

SR: [Pages 60 - 61](#)

SR: [Page 66](#)

[Health & Safety \(Mercer Website\)](#)

GRI 404: Training and Education 2016

DISCLOSURE & REPORTING REQUIREMENTS

404-2 Programs for upgrading employee skills and transition assistance programs

The reporting organization shall report the following information:

a. Type and scope of programs implemented and assistance provided to upgrade employee skills.

b. Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

LOCATION AND DETAILS

10K: [Pages 24 - 25](#)

a. We promote employee development by reviewing strategic positions regularly and identifying potential internal candidates to fill those roles, evaluating job skill sets to identify competency gaps and creating developmental plans to facilitate employee professional growth. We invest in our employees through training and development programs, on the job experiences and coaching. We provide technical and leadership programs across the organization that enable colleagues to grow skills and capabilities to become more successful. We also have dedicated talent programs that support and accelerate leadership development and strengthen our succession plans.

b. N/A

GRI 405: Diversity and Equal Opportunity 2016

DISCLOSURE & REPORTING REQUIREMENTS

405-1 Diversity of governance bodies and employees

The reporting organization shall report the following information:

a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:

- i. Gender;
- ii. Age group: under 30 years old, 30-50 years old, over 50 years old;
- iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

b. Percentage of employees per employee category in each of the following diversity categories:

- i. Gender;
- ii. Age group: under 30 years old, 30-50 years old, over 50 years old;
- iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

LOCATION AND DETAILS

10K: [Page 26](#)

SR: [Page 67](#)

The percentage of women employees and percentage of women in management as of December 31, 2022 was 18% and 25%, respectively. The percentage of women hired in 2022 was 20%.

GRI 413: Local Communities 2016

DISCLOSURE & REPORTING REQUIREMENTS

413-1 Operations with local community engagement, impact assessments, and development programs

The reporting organization shall report the following information:

- a. Percentage of operations with implemented local community engagement, impact assessments, and/or development programs, including the use of:
 - i. social impact assessments, including gender impact assessments, based on participatory processes;
 - ii. environmental impact assessments and ongoing monitoring;
 - iii. public disclosure of results of environmental and social impact assessments;
 - iv. local community development programs based on local communities' needs;
 - v. stakeholder engagement plans based on stakeholder mapping;
 - vi. broad based local community consultation committees and processes that include vulnerable groups;
 - vii. works councils, occupational health and safety committees and other worker representation bodies to deal with impacts;
 - viii. formal local community grievance processes

LOCATION AND DETAILS

SR: Pages 86 - 93



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