

AFG POSITION STATEMENT AGAINST MODERN SLAVERY & HUMAN TRAFFICKING - 2024

The All Fab Group (“AFG”, “we” or “our”) is in full support of Canada’s Modern Slavery Act (the “Act” - formerly Bill S-211) and as such will continue to take various steps to mitigate the risk of modern slavery (including forced labour or child labour) and human trafficking practices occurring within our businesses or within our supply chain. This position statement is being filed for All Fab Group for its fiscal year ended 31 December 2024.

1. Introduction:

We hold ourselves to the highest levels of integrity, honesty, and transparency everywhere we operate, we do not allow modern slavery or human trafficking anywhere within our businesses and we uphold our standards of integrity in every situation, not allowing, asking, or enabling others to engage in prohibited conduct on our behalf.

2. Our values:

- a. Modern slavery, as an all-encompassing term, addresses several human rights issues including forced labour, bonded labour, child labour, human trafficking, and slavery-like practices. AFG has a zero-tolerance stance against these practices, as set forth in our labour, employment, and business conduct policies. These policies reflect our commitment to acting ethically and with integrity in all our business relationships and company business activities, all with the aim of preventing these practices in our organization and in our supply chain.

3. Our Structure, Operation and Supply chains:

- a. We conduct our business across Canada and in the United States, supplying building components, structures, and building materials for the light construction industry.
- b. We have a centralized procurement team managed from our main corporate office which is responsible for our supply chain practices and operations. Our procurement team procures products from suppliers primarily in the jurisdiction of North America.

4. Parts of AFG’s Business or Supply Chains that Carry a Risk of Forced or Child Labour

- a. AFG has not identified any incidences or specific risks of modern slavery or human trafficking in its supply chains. AFG is not aware of any such issues with respect to its suppliers and, as outlined in this report, would take various steps to mitigate this risk should it exist. AFG would take swift action – up to and including potentially terminating a relationship with a supplier – if we were to learn of modern slavery or human trafficking in the supply chain of said supplier.

All Fab Group, 200-1601 Regent Avenue West, Winnipeg, MB R2C 3B3

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5. Policies:
 - a. We have developed an Anti-Slavery and Anti-Human Trafficking Policy to reflect our commitment to ensuring that there is no modern slavery or human trafficking in our supply chain or within our own business operations.
 - b. Our Anti-Slavery and Anti-Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships by establishing appropriate education, reporting, monitoring, and auditing processes within our organization and across our supply chain relationships.

6. Identifying and addressing risk – Employees:
 - a. Our Human Resources (HR) team is directly responsible for the oversight of all employment policies and practices within our company in compliance with the Act.
 - b. The HR team is further responsible for adherence to all applicable employment standards and labour codes within the jurisdictions of our operations.
 - c. The AFG HR leader is directly accountable to the President and CEO for regular reporting on the status and implementation of all related policies and practices.

7. Identifying and addressing risk – Our Communities
 - a. Our leaders and Human Resources (“HR”) team will provide support to any employee who wishes to report any incidence of either modern slavery or human trafficking, even if it is not directly related to the conduct of our business. In this regard, we believe it is our responsibility to also provide support to our communities in eliminating these violations of human rights. The AFG HR leader will ensure that any such reporting is passed on in a timely manner to local law enforcement authorities. Additionally, we shall ensure that any employee who reports such incidents will be provided with appropriate confidential health and welfare support services from our company benefits programs.

8. Identifying and addressing risk – Supply chain:
 - a. Our procurement team is directly responsible for all supply chain policies and practices within our company in compliance with the Act. These policies are described in section 5 of this statement.
 - b. The procurement team is further responsible for implementing those policies and practices as a part of our business conduct with all supply chain partners.

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9. Training and awareness:

- a. Our Executive and Senior Management teams have been educated on the Act, this Statement and our associated Policy.
- b. Our Procurement team is fully versed in all aspects of the matter as a part of their responsibility in the execution of all supply chain practices for the company.
- c. Employees will be encouraged to advise either their supervisor or our HR leader if they become aware of any modern slavery or human trafficking incidents. If we become aware of such incidents, we shall take the appropriate steps to address these incidents, including, where necessary, terminating relationships with employees or suppliers.

10. Remediation

- a. As noted in section 4 of this statement, AFG has not identified any incidences of modern slavery or human trafficking in its supply chains. Accordingly, no measures have been taken to remediate any such incidences or to remediate any resulting loss of income.
- b. We shall implement a remediation action plan for all incidences of non-compliance. Any Supplier that is unable to comply to our satisfaction will be removed as a source of supply, at our sole discretion.

11. Monitoring & assessing:

- a. To maintain internal accountability standards regarding this Statement and associated policies, AFG will ensure appropriate communications to our Suppliers and Customers.
- b. We shall require our Suppliers to provide reports of their compliance with our Policies not less than annually. We shall also reserve the right, at our sole discretion, to audit the Supplier compliance with their own policies.
- c. We shall reserve the right to conduct audits of our Supplier facilities as may be required at our sole discretion.

12. Approval:

This report has been approved by the Board of Directors of All Fab Building Components LP on its own behalf.

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

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for the reporting year listed above. For clarity, I am providing this attestation in my capacity as a Director of All Fab Building Components LP and not in my personal capacity.

Signature: _____

Name: Edward S. Richmond

Title: President and Chief Executive Officer

I have authority to bind All Fab Building Components LP.

Date: 30 May 2024

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