



**Annual Report under the *Fighting Against Forced Labour in Supply Chains Act*
Alumicor Ltd., 2023-24**

This report has been produced by Alumicor Limited (“**Alumicor**”) for the financial year ending March 2, 2024 (the “**Reporting Period**”). This report identifies and explains the procedures and policies adopted to prevent and reduce the risk of child labour and forced labour being present in any step of the production, importation, and sale of goods in Canada or elsewhere.

Alumicor is committed to ensuring that fundamental human rights are respected and that its business practices and operations are consistent with and in support of the UN Guiding Principles on Business and Human Rights. We value and strive to uphold the highest standards of integrity, ethical behaviour, transparency, safety, and corporate citizenship.

This report is the first to be produced by Alumicor pursuant to Canada’s newly adopted *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). Alumicor’s parent company, Apogee Enterprises, Inc., (“**Apogee**”) has also published a Human Rights statement which reiterates our commitment and attentiveness in respecting human rights internationally and excluding any forms of forced labour and child labour throughout our supply chain.

I. Structure, Activities and Supply Chains

Alumicor is registered and has its head office in Toronto, Ontario. Alumicor has production facilities in Toronto and Winnipeg, Manitoba, and a sales office in Montreal, Quebec.

Alumicor manufactures pre-engineered aluminum-framed building fenestration products, including windows, curtain wall, storefront and entrance systems. Our products are incorporated into the building envelope, or façade, of commercial, industrial, and institutional buildings, as part of both new construction and renovation projects. Our products generally consist of a finished aluminum frame, hardware, gaskets and sealants.

Apogee, which owns 100% of Alumicor, is headquartered and principally located in Minneapolis, Minnesota, United States of America.

Apogee is a leading provider of architectural products and services for enclosed buildings, and high-performance glass and acrylic products used for preservation, energy conservation and enhanced viewing.

Alumicor purchased various inputs in the Reporting Period, the most significant of which were aluminum extrusions; hardware and components; packaging materials; and chemicals/compounds. We sourced these products mostly from Canada and the United States. We also sourced a limited amount of inputs from Europe and Asia.

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II. Our Policies and Training on Countering, Reporting and Detecting Forced and Child Labour

Alumicor enforces and abides by Apogee’s Code of Business Ethics and Conduct, Supplier Code of Conduct (“**Supplier Code**”), Conflict Minerals Policy, and other policies that encourage ethical business practices and purchasing activities. This commitment is extended to our employees, managers and suppliers to ensure that Apogee embeds human rights considerations throughout its supply chain and decision-making processes.

A. Statement on Human Rights

Apogee’s Statement on Human Rights (“**Statement**”), which apply equally to its Canadian subsidiaries, holds that our approach to human rights is guided by internationally recognised standards and practices. Apogee has embedded its principled stance on the respect and protection of human rights in its values and Code of Business Ethics and Conduct.

The values expressed in Apogee’s Statement apply to all of its subsidiaries and their operations, regardless of geographic location. All business partners, including suppliers and other parties working on behalf of any Apogee business, are expected to observe the principles and values communicated in the Statement. Apogee is strictly opposed to and will not tolerate the use or inclusion of child labour, forced labour, slavery, human trafficking or other oppressive, illegal forms of labour in Apogee’s transactions and production processes, nor those of Apogee’s suppliers, partners or any party with whom Apogee conducts business.

B. Supplier Code of Conduct

Apogee’s Supplier Code expresses policies, values and expectations that align with Apogee’s Code of Business Ethics and Conduct, Conflict Minerals Policy and Human Rights Statement. Apogee’s Supplier Code applies to all suppliers (defined as any organisation that directly provides goods and services to Apogee) of Apogee and its subsidiaries, including Alumicor. The Supplier Code is periodically reviewed, modified and amended. Apogee’s Senior Manager of Procurement Analytics is responsible for the management and implementation of the Supplier Code and its accompanying policies.

The Supplier Code assures that suppliers conduct their business in compliance with all laws, rules and regulations, including those that prohibit unfair or illegal trade practices, bribery, corruption, unfair pricing and misrepresentation of products or services. The Supplier Code holds that all applicable international, federal, state, provincial and local legislation, laws, rules and regulations on human rights, conflict minerals, labour and the environment are equally and robustly respected by all suppliers. With respect to forced and child labour, the Supplier Code states:

...Apogee strictly prohibits and is opposed to the use of child labor, forced labor, slavery, or any other oppressive labor conditions, as well as any form of human trafficking. Apogee will not knowingly do business with any supplier which engages in these practices and reserves the right to take corrective actions, up to and including termination of the relationship.

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To ensure that the Supplier Code and its values are upheld by all suppliers, Apogee maintains the right to engage with suppliers to monitor their operations. In the case that instances of non-compliance with the Supplier Code are detected or discovered, Apogee may require a commitment by the supplier to implement a corrective action plan to return the supplier to compliance with the Supplier Code. If non-adherence to the Supplier Code continues, Apogee may, at its discretion, terminate its relationship (including that of its subsidiaries) with the supplier that does not share Apogee's values with regard to human rights and prevention and exclusion of forced and child labour.

C. Duty to Report

Employees and personnel of Apogee have a duty to report any suspected or actual breach of any aspect of the Supplier Code, policies, the law or regulations. Further, this duty to report extends to the conduct by Apogee suppliers and other third parties working with Apogee in any capacity. Reports of violations can be submitted on a confidential basis to avoid any forms of repercussions or retaliations.

Reports of suspected or confirmed instances of child and forced labour can be submitted in a variety of methods and forms:

- Online: www.apog.ethicspoint.com (enter the organization name of "Apogee") (worldwide)
- By Telephone: Apogee Code of Conduct Hotline—800.441.6164 (toll-free in the U.S. and Canada)
- In Writing: Apogee Enterprises, Inc., 4400 West 78th Street, Suite 520, Minneapolis, Minnesota 55435 USA Attention: General Counsel
- By Email: ApogeeLegal@apog.com; ApogeeCompliance@apog.com

If employees, personnel and suppliers of Apogee have any questions regarding the Supplier Code, including potential violations, we recommend that they contact the Apogee Procurement Office at procurement@apog.com.

D. Consequences of Violations of the Supplier Code, the Law or Regulations

In the case that a violation of the Supplier Code or other policies, laws or regulations that are not superseded by international or local law are found to have occurred, including the practice of child or forced labour, Apogee will require that corrective measures be taken to ensure that operations and business activities are brought in line with Apogee's values and policies. In the case that this is rejected or insufficiently implemented, Apogee may, at its discretion, terminate the relationship.

E. Training

When employees are hired by Alumicor, they are required to take training on Apogee's Code of Business Ethics and Conduct. These training sessions cover numerous areas such as equal

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opportunity, discrimination, harassment and ethical decision making, which may extend to instances of alleged or suspected child and forced labour. Employees of Alumicor are also required to complete annual training online via Workday in October or November of every year.

Further, the Supplier Code includes a systemic signoff for evidence of training completion to ensure that employees, managers and personnel are aware of Apogee’s policies, values and resources concerning the prevention and exclusion of human rights abuses in the supply chain, including child and forced labour. Apogee also highly encourages its suppliers to implement an analogous training session to educate their leadership and employees on Apogee’s expectations that suppliers comply, where possible, with the established expectations and principles in the Supplier Code and accompanying policies.

III. Parts of Our Supply Chain that Carry Risk of Forced or Child Labour

For the purpose of preparing this report, we examined our supply chain to identify aspects of the supply chain that may carry a heightened risk of forced labour. To do so, we have relied on various tools, including:

- a) the “Responsible Sourcing Tool”, which is the result of a collaboration between Verité, an independent civil society organization, and the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons;¹
- b) the US Bureau of International Labour Affairs “Better Trade Tool”;²
- c) the Uyghur Forced Labour Prevention Act (“UFLPA”) Entity List;³
- d) the Withhold Release Orders and Findings List published by the US Customs and Border Protection Agency;⁴ and
- e) the “KnowTheChain” organisation website and reports.⁵

The most significant inputs purchased in our most recently completed financial year, by dollar value, were aluminum extrusions; hardware and components; packaging materials; and chemicals/compounds. These products and our suppliers of these products are addressed below.

¹ Responsible Sourcing Tool, “Identify Risks in Your company’s Global Supply Chains”, accessed on 15 May 2024. The Responsible Sourcing Tool is the result of a collaboration between Verité, an independent civil society organization, and the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons. See <https://www.responsiblesourcingtool.org/>.

² Bureau of International Labor Affairs, “Better Trade Tool”, accessed on 24 May 2024. The Better Trade Tool integrates existing reporting developed by the Bureau of International Labor Affairs (ILAB) with U.S. import trade data to serve as a resource in learning about labour exploitation risks in global supply chains. See <https://www.dol.gov/agencies/ilab/better-trade-tool>.

³ U.S. Department of Homeland Security, “Uyghur Forced Labor Prevention Act (UFLPA) Entity List”, accessed on 14 May 2024. See <https://www.dhs.gov/uflpa-entity-list>.

⁴ U.S. Customs and Border Protection, “Withhold Release Orders and Findings List”, accessed on 12 April 2024. The Withhold Release Orders and Findings are issued by the Commissioner and are published in the Federal Register. See <https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>.

⁵ KnowTheChain, “Company List”, accessed on 16 May 2024. See <https://knowthechain.org/company-list/>.

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A. Metals

Alumicor sources aluminum extrusions for its building envelope products primarily from related suppliers in the United States and from suppliers in Canada. We understand that most of the aluminum used to produce these extrusions was sourced from the United States and Canada.

According to the Responsible Sourcing Tool, the metals sector possesses the following risk factors:

- Hazardous/undesirable work;
- vulnerable, easily replaced, and/or low-skilled workforce;
- migrant workforce;
- presence of labour contractors, recruiters, agents or other middlemen in labour supply chain; and
- long, complex, and/or non-transparent supply chains.

The United States and Canada are noted as key producing countries for the “extractives, mining and metal” grouping by the Responsible Sourcing Tool, with the note that “due diligence is advised”. The Responsible Sourcing Tool does not show a documented risk of forced and/or child labour in the United States or Canada.

For the purpose of preparing this report, Alumicor has screened our suppliers of aluminum extrusions in the Reporting Period. None of our suppliers of aluminum extrusions have been flagged in any published lists or databases documenting supply chain risks.

B. Hardware and Components

In the Reporting Period, Alumicor purchased hardware and assembly/industrial components primarily from Canada and the United States, with limited sourcing from Europe and Asia. These purchases included curtain wall, door, storefront and window hardware as well as assembly and system components, such as glazing gaskets, sealants, and latches.

The Responsible Sourcing Tool and the Better Trade Tool do not identify risks of child and forced labour for hardware and components.

Certain foreign countries from which Alumicor imported these products possess risks associated with forced labour. In one case, this includes heightened risk associated with human trafficking according to the Responsible Sourcing Tool and the United States Department of State. The forced labour risks in this country exists across a variety of products according to the US Better Trade Tool. However, none of those product categories would reasonably include the products sourced by Alumicor from the country in question.

We have also verified with the resources cited above that none of our suppliers in the Reporting Period are included as companies documented to have or suspected to have committed human rights abuses in their production processes, such as forced or child labour.

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Given the heightened country risk that we have identified, we will continue to monitor relevant lists and databases to ensure compliance with our Supplier Code.

C. Packaging Materials

In the Reporting Period, Alumicor purchased packaging materials, primarily wood products, from Canadian suppliers.

We have identified risks of forced labour in relation to the forestry industry only in relation to bamboo products from Myanmar.

Our research confirms that Canada is a low-risk jurisdiction for forestry products.

None of our suppliers of packaging materials in the Reporting Period have been flagged in any published lists or databases documenting supply chain risks.

D. Chemicals/Compounds

The chemicals and compounds purchased by Alumicor in the reporting year were sourced from a related supplier in the United States.

The Responsible Sourcing Tool and the Better Trade Tool do not identify risks of child and forced labour for basic chemicals and/or compounds.

Our research confirms that the United States is a low-risk jurisdiction.

None of our suppliers of chemicals and compounds in the Reporting Period have been flagged in any published lists or databases documenting supply chain risks.

I. Due Diligence

Alumicor has embedded responsible business conduct into its policies and management systems, including our Supplier Code.

In addition, for the purpose of preparing this report, we screened our suppliers using multiple reputable lists and tools. Our screening process is described in the section above.

II. Any Measures Taken to Remediate Any Forced/Child Labour

Alumicor has not identified any instances of forced or child labour in our supply chain and so no remediation measures have been required.

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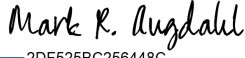
III. Assessing Effectiveness

Alumicor did not take actions in its most recently completed financial year to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains.

IV. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act.

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

DocuSigned by:

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Signature

Name: Mark R. Augdahl
Position: Director
Company Name: Alumicor Ltd.

Date: 5/31/2024

I have the authority to bind Alumicor Ltd.