



2023 Modern Slavery Report

I. Our Business

This Report is provided in compliance with the *Fighting Against Forced Labour and Child Labour Act* (the Act) for the financial year ending December 31, 2023.

Custom Building Products of Canada LTD. (“CBP”) is incorporated in British Columbia with its corporate headquarters in Atlanta, Georgia, USA.¹ CBP manufactures and distributes mortars and grouts largely for tile and flooring applications, as well as preparation products.

Our manufacturing facilities are located in Cambridge, ON and Surrey, BC. Our products are sold in the Canadian market through an extensive marketing and distribution system. Operations conducted in those facilities vary from manufacturing to distributing our products to customers.

Our supply chain consists of raw material suppliers, providing notably sand, cement, and other material inputs, and suppliers of non-product goods and services. The raw materials, components, and items required to manufacture our products are procured from suppliers primarily located in Canada and the United States.

II. Our Policies and Due Diligence Processes

We are committed to providing employees the opportunity to communicate their concerns, operating our facilities in a safe and efficient manner by creating a positive and productive working environment, and continuing to be good neighbors and corporate citizens in all the communities we operate. Employees may communicate their concerns to colleagues, including supervisors, human resource representatives, legal services representatives, or next level of management.

We are also committed to safe working conditions. Every employee is responsible for protecting their own health and safety, as well as the health and safety of other employees, contractors, vendors, customers and guests by complying with applicable federal and local law and all health and safety procedures and practices established by CBP.

Due to the relatively low-risk nature of our supply chain, we have not developed policies tailored to forced labour or child labour.

III. Assessing and Managing Risks

We utilize a risk-based approach to prioritize our effects and adjust our actions. Due to the nature of our supply chain being based extensively in Canada and the United States and the low risk of child labour or forced labour being used for our material inputs, we assess that the risk of forced

¹ The terms “we,” “our,” and “CBP” as used in this document refer collectively to Custom Building Products of Canada LTD., its subsidiaries, and the joint ventures it operates, unless the context suggests otherwise. The terms are used for convenience only and are not intended as a precise description of any legal entity within CBP.

labour or child labour is very low. We have not developed any additional processes this reporting year.

IV. Remediation, Training, and Effectiveness

a. Remediation

We have not identified any instances of forced labour or child labour in our activities or supply chain and do not currently have a formal policy on how we would remediate any loss related to such activities.

b. Training

Our employees receive regular training on our policies, including on discrimination, harassment, antitrust, and disability accommodation. We did not provide training in 2023 related to child labour or forced labour.

c. Assessing Effectiveness

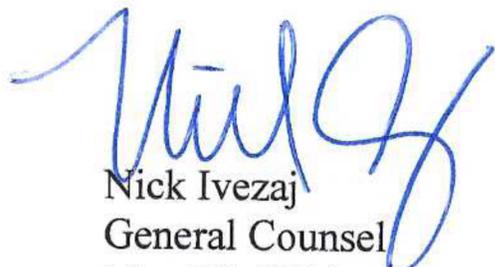
We have not yet taken any actions to assess the effectiveness of our policies to prevent and reduce the risk that forced labour or child labour is used in our supply chain.

V. Approval and Attestation

This Report was approved pursuant to paragraph 11(4)(a) of the Act on behalf of CBP.

In my capacity as General Counsel, I make this attestation in accordance with the requirements of the Act:

I attest that I have reviewed the information contained in the report for the entity 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 material respects for the purposes of the Act for the reporting year above.



Nick Ivezaj
General Counsel
May 30, 2024