

### JELD-WEN of Canada, Ltd. 2024 Report in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act, (S.C. 2023, c. 9) (the "Act")

#### I. JELD-WEN ACTIVITIES, STRUCTURE AND SUPPLY CHAINS

#### **Activities**:

JELD-WEN of Canada, Ltd. (JELD-WEN) is a leading manufacturer of interior and exterior doors and windows serving the new construction, repair, and remodeling sectors of the residential and commercial markets throughout Canada.

#### Structure:

JELD-WEN is a subsidiary of JELD-WEN Holding, Inc., a publicly traded (NYSE) corporation, headquartered in Charlotte, North Carolina, USA. JELD-WEN has 1165 employees, is headquartered at 5750 Explorer Dr #402, Mississauga, ON L4H 0A9, Canada and operates manufacturing facilities in New Brunswick, Ontario, Manitoba, and Québec. JELD-WEN is an entity under subsection 2(b) of the Act.

#### **Supply Chain:**

JELD-WEN's products are sold through multiple distribution channels, including direct sales to major builders, retail home centers and traditional window and door distributors. JELD-WEN sources its products and raw materials from group owned manufacturing sites in the United States and Europe. JELD-WEN also sources products and components from third parties in Canada, the United States, Europe, and Southeast Asia.

#### II. JELD-WEN POLICIES & DUE DILIGENCE PROCESSES IN RELATION TO FORCED & CHILD LABOUR

#### **Policies:**

JELD-WEN's first corporate value is to conduct its business ethically, which includes a commitment to supply chain transparency and compliance with all applicable laws and regulations, including the Act.

The following JELD-WEN group policies relate to forced labour and child labour:

<u>JELD-WEN's Code of Business Conduct and Ethics (Code)</u>: [<u>LINK-English</u>] [<u>LINK-French CAN</u>]

JELD-WEN's Code is the central document that outlines the Company's overarching commitment to values and ethical approach. The Code is also the foundation for the Company's central policies and procedures.

#### JELD-WEN's Supplier Code of Conduct (Supplier Code): [LINK]

The Supplier Code sets forth the expectations and standards of JELD-WEN for all of the group company vendors and suppliers. Violations of the Supplier Code can result in termination of business relationships.

#### JELD-WEN's Supply Chain Transparency Disclosure: [LINK]

The group's Supply Chain Transparency Disclosure sets out JELD-WEN's commitment to an ethical supply chain and the Company's approach to ethical sourcing and preventing human trafficking, child labour and modern slavery.

#### JELD-WEN's Human Rights Policy Statement: [LINK]

The Human Rights Policy Statement sets forth JELD-WEN's commitment to respecting human rights in all aspects of its business.

#### **Due Diligence:**

JELD-WEN's third-party vendors are contractually required to adhere to all applicable laws and regulations, including compliance with human trafficking and supply chain transparency regulations. Further, JELD-WEN's third-party vendors are also required to acknowledge and comply with JELD-WEN's Supplier Code of Conduct, referenced above, which specifically includes labor and human rights mandates.

JELD-WEN also utilizes a third-party vendor risk management and enterprise due diligence program called RiskRate from NAVEX, Inc., which is used to continuously monitor vendors against a global risk intelligence database. The program screens vendors against sanctions and watch lists, politically exposed persons lists and adverse media to detect and identify risks in our supply chain.

Finally, JELD-WEN's sourcing and procurement personnel meet regularly with our vendors, and visit select vendor locations to reinforce our commitments and to review the vendors' operations for areas of concern.

## III. <u>JELD-WEN PARTS OF THE BUSINESS & SUPPLY CHAINS THAT CARRY A RISK TO FORCED & CHILD</u> LABOUR BEING USED & THE STEPS TAKEN TO ASSESS & MANAGE THAT RISK.

JELD-WEN managers at the group level meet annually to assess supply chain risks, including the risks of forced and child labour. Risks related to forced and child labour in our North American operations are considered low risk because of the Company's, and our vendors', compliance with applicable employment and labor regulations. We have categorized risks of forced and child labour as medium with our vendors in Southeast Asia, based on the global risk index for that region and individual countries.

To manage and mitigate the identified risks, JELD-WEN has implemented the policies and due diligence processes referenced above. Specifically, the Company utilizes the RiskRate platform, a whistleblower hotline, training, and vendor site visits to manage the risks.

#### IV. MEASURES TAKEN TO REMEDIATE ANY FORCED LABOUR OR CHILD LABOUR

JELD-WEN has not encountered circumstances where remediation of forced labour or child labour has been necessary, so this section is not applicable for 2024. However, the Company is committed to immediately address any instances of forced or child labour in accordance with our policies and any applicable laws or regulations.

# V. MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT RESULTS FROM ANY MEASURE TAKEN TO ELIMINATE THE USE OF FORCED LABOUR OR CHILD LABOUR IN ACTIVITIES AND SUPPLY CHAINS

JELD-WEN has not encountered circumstances where remediation of a loss of income related to forced or child labour has been necessary, so this section is not applicable for 2024. If JELD-WEN encountered an instance of forced or child labour, the Company would implement measures to remediate the loss of income.

#### VI. THE TRAINING PROVIDED TO JELD-WEN EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

JELD-WEN conducts annual training for all global staff and managerial on various aspects of the Company's Code of Conduct, which includes references to supply chain transparency, human trafficking and forced labor. As part of that training, employees are required to attest to that Code of Conduct, represent that they are not aware of potential violations and that they are aware of reporting mechanisms, including an anonymous hotline, to report concerns. Additionally, in September 2023, JELD-WEN Holding, Inc.'s Chief Compliance Officer conducted a live training course, entitled "Modern Slavery in the Supply Chain", for the global procurement, sourcing and supply chain employees. That course trained employees on JELD-WEN's policies with respect to human trafficking and forced labor, our legal and ethical obligations, ways to identify any signs of labor violations in our operations and vendor relationships, and reporting avenues and requirements.

## VII. HOW JELD-WEN ASSESSES THE EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR ARE NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS.

JELD-WEN relies on internal reporting and our continuous third-party vendor monitoring (NAVEX) to assess the effectiveness of our policies related to forced and child labour.

#### **VIII. BOARD ATTESTATION STATEMENT & APPROVAL**

In accordance with the requirements of the Act, and in particular subsection 11(5) thereof, I attest that I have reviewed the information contained in this report for JELD-WEN. 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.

This report was approved pursuant to paragraph 11(4)(a) of the Act, being by the directors of the corporation.

I further attest that I have the authority to bind JELD-WEN of Canada, Ltd.

**Robert Conway** 

Vice President and Director,

JELD-WEN of Canada, Ltd.

Date

18/2024