



Kohltech International Limited

Report pursuant to the Fighting Against Forced Labour
and Child Labour in Supply Chains Act

Fiscal Year ended December 31, 2023

Introduction

Kohltech international Limited (Kohltech) designs and manufactures high quality and energy efficient windows and entrance systems. At Kohltech, our vision is to be North America's most respected window and door company. To be a brand employees want to work for, dealers want to represent, and customers want in their homes.

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is the report for Kohltech International Limited, which has an obligation to publish a report under the Act. This report covers the fiscal year ended December 31, 2023.

Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

Kohltech became aware of the Act extremely late in our fiscal year, which concluded prior to the Act receiving royal assent. As a result, steps taken consisted solely of awareness activities to learn about the Act.

In 2024 Kohltech has begun the process of developing actions to prevent and reduce the risk of Forced Labour and Child labour within our supply chain. These actions include:

- Mapping of our supply chain
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing anti forced labour and child labour contractual clauses
- Developing and implementing anti forced labour and child labour standards, codes of conduct and compliance checklists
- Monitoring suppliers
- Developing and implementing training and awareness materials on forced labour and child labour
- Engaging with supply chain partners on the issue of addressing forced labour and child labour

Structure, Activities and Supply Chain

Structure

Kohltech is one of Canada's largest window and door manufacturers, with its head office in Debert, Nova Scotia. Our manufacturing facilities are located in Debert, Nova Scotia; Edmonton, Alberta; and North Bay, Ontario.

Activities and Supply Chain

From an operational perspective Kohltech manufactures windows and entrance systems used in the residential and light commercial sectors. We distribute our products through a network of independent dealers who sell them to homeowners, builders and renovators throughout Canada and the Northeastern United States.

We rely on many suppliers for raw materials and indirect goods and services. Our supply chain involves purchasing a broad range of goods and services, from North American sources and we are in the process of further tracing our supply chain.

We are deeply committed to the highest standards of respect and integrity in our business relationships and activities. These standards apply within our organization and are also expected of our suppliers.

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

We believe that good management is the essential foundation of a respectful and inclusive corporate culture that earns trust and builds value for all our stakeholders. We also recognize that respecting human rights is a shared responsibility of all enterprises regardless of where they operate globally. This perspective aligns with our Purpose, Mission, Core Values and Creed.

In 2024, Kohltech is engaged in developing and implementing policies and due diligence processes in relation to forced labour and child labour.

Risk of Forced Labour or Child Labour Being Used and The Steps Taken to Assess and Manage Risk

Kohltech recognizes that some elements of our supply chain may present a risk of forced labour or child labour. We are working on assessing this risk and developing steps to identify and manage this risk.

Measures Taken to Remediate Any Forced Labour or Child Labour Occurrences Identified

To date there have been no identified or reported instances of forced labour or child labour in our activities and supply chain.

Remediation of Loss of Income to the Most Vulnerable Families that Results from any Measures Taken to Eliminate the Use of Forced Labour or Child Labour in Our Activities and Supply Chains

To date there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Training Provided to Employees on Forced Labour and Child Labour

External training has been provided to Senior Management and all members of Kohltech's Supply Chain Management team in 2024.

Assessment of the Effectiveness of Ensuring that Forced Labour and Child Labour are Not Being Used in Our Business and Supply Chain

Kohltech recognizes that to reduce and prevent the risk of forced labour and child labour within our operations and supply chain, we must assess the effectiveness of our actions. As new processes and procedures are implemented they will be accompanied by tools to measure their effectiveness.

Conclusion

Kohltech International Limited is committed to implementing policies and procedures to prevent forced labour and child labour from occurring in our business and in our supply chain.

Approval and Attestation

This report was approved on May 29,2024.

In accordance with the requirements of the Act, and in particular section 11 thereof and pursuant to paragraph 4(a), 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 all material respects for the purposes of the Act, for the reporting year listed above.



Carl Ballard

President, Kohltech International Limited

I have authority to bind Kohltech International Limited