



## NGP COMPANIES FORCED LABOR POLICY

### INTRODUCTION

National Guard Products, Inc., Jordan Aluminum LLC, Architectural Unique, A.K. Draft Seal, and Sealed Tight Solutions, collectively known as “NGP Companies” (“NGP”) are aware of their responsibility to respect human rights within their supply chain, as a global group of companies in the Door Accessory industry. This includes the right to freedom from slavery and forced labor, meaning that NGP does not tolerate any form of servitude or slavery, or forced, bonded, indentured, trafficked, or non-voluntary labor. NGP has developed this Policy in alignment with the following key standards.

- International Labor Organization (ILO)
- International Labor Standards on Forced Labor
- U.S. Customs and Border Protection

### NGP'S APPROACH

#### Overview

Our people are at the heart of what we do, therefore, we must commit to a safe and humane working environment to ensure success in serving each other and our customers daily. As a part of our commitment to protecting human rights, NGP prohibits the use of forced labor in all operations, including the operations and supply chain of our suppliers.

NGP considers any work for which a person has not offered themselves voluntarily (“involuntary labor”) and which is performed under the menace of any penalty (concept of “coercion”) applied by an employer or a third party to the worker to be forced labor. Forced labor is not characterized by the nature of the work performed, but rather by the relationship between the worker and their employer, supervisor, or other person in control. Forced labor can be identified by the International Labor Organization’s (ILO) Forced Labor Indicators, included below. Business Partners and Suppliers are expected to reference the ILO Guidelines to Estimate Forced Labor of Adults and Children to understand how these indicators are used to identify forced labor. Business Partners must also have processes in place to identify indicators of forced labor in their operations.

#### ILO Indicators of Forced Labor

- Abuse of vulnerability
- Deception
- Restriction of Movement
- Isolation
- Physical and Sexual Violence
- Intimidation and Threats
- Retention of Identity Documents
- Withholding of Wages
- Debt Bondage
- Abusive working and living conditions.
- Excessive Overtime

All forms of forced labor are strictly prohibited in NGP's supply chains. NGP commits to implement measures that respect and fulfill the principles laid out in this Forced Labor Policy, and all NGP business partners and other suppliers are expected to do the same. 'Other suppliers' include all NGP's agents, vendors, service providers, manufacturers, factories, warehouses, and subcontractors relevant to NGP's supply chains and business processes. The principles outlined in this document set the standard for all NGP business processes and Suppliers. We ask that all Suppliers ensure they have adequate and effective policies, procedures, training, and record-keeping practices in place to ensure their compliance and the compliance of their value chains.

The principles apply equally to regularly employed workers, informal workers, seasonal and temporary workers, contracted and subcontracted workers, migrant workers, and homeworkers.

There must be no discrimination in the application of these norms based on sex, gender and gender identity, ethnicity, nationality, race, color, social origin, religion, faith, age, legal status, political opinion, disability, sexual orientation, pregnancy, or trade union membership or activity.

## **Principles**

### Legal Requirements

NGP commits, and requires all business partners, to be fully aware of, and compliant with, all local, regional, and international laws and regulations on labor protection, as applicable in all countries where business operations take place.

### Freedom of Employment

All workers shall have the right to choose their employment voluntarily and freely, free of deception and without the threat of a penalty. The employer must not obtain work or service from any person under the threat of any negative consequences. Work must not be obtained on the basis of debt. Workers must be free from the threat of physical, psychological, sexual, or gender-based violence or harassment. All employer-worker relationships must be agreed to on the principle of free and informed consent. Each worker must be made aware of their employer's expectations before starting work or departing from their current residence to move to the country or region of employment. Employees must be provided with understandable information about their rights and responsibilities (such as an employee handbook). Workplace practices and conditions that violate basic human rights are not tolerated.

Workers must be allowed to enter and leave work facilities at will, to move freely within their workspace, and must not physically confine workers either during or outside working hours. Illegal restrictions on workers' freedom of movement are prohibited. However, reasonable limitations to movement within the workspace during work hours are permitted under conditions related to workplace discipline. Workers must have access to drinking water and toilet facilities.

Mandatory residence in employer-operated residences shall not be made a condition of employment.

Workers must be free to change their employer whenever they wish, subject only to the normal

and/or legally mandated notice period. In the case of resignation, there must be no threat, whether physical, psychological, financial, or legal, to the workers, to their families, or other third parties. Resigning workers must be paid whatever outstanding wages and benefits are still owed timely and following national or local law. Workers must not be made to resign against their will, whether through coercion, deception, or other means, such as via forged or pre-signed resignation documents, or threatened with involuntary resignation as a means of coercion.

#### Retention of Documents

It is against policy to retain, confiscate, destroy, or withhold any original personal identification and immigration documents (e.g., passport, national ID, school certificate, work permit, etc.). Workers must have unrestricted and immediate access to these documents.

#### Wages and Benefits

All workers shall be paid at least the minimum wage required by applicable laws and shall be provided with all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, following national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorized by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers. Clear and transparent information should be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain complete control over their earnings. Wage deductions must not be used as a disciplinary measure, or to keep workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work to pay off a debt.

#### Working Hours

Working hours, consecutive working days, statutory holidays, and leave must be compliant with national or local labor law, including where special provisions are made for workers based on gender, age, disability or other status. Overtime work must be compensated according to national or local law. Off-the-clock work is prohibited. During working hours, reasonable accommodations must be made to allow workers rest breaks and to access sanitation facilities and potable water.

#### Migrant Workers and Refugees

Migrant workers, refugees, and internally displaced people must be granted the same rights to safe and decent working and living conditions as other workers.

#### Debt Bondage

Any employment relationships founded on debts between the employee and the employer or recruiter (or any other relevant third party) are strictly prohibited in NGP's supply chains.

Workers must not be charged, directly or indirectly, whole or in part, any recruitment fees or other related costs to secure their employment. If workers have paid such fees, the company must reimburse workers for the fees. The company must not charge workers for or have wages deducted for living expenses, such as food, housing, transportation, or equipment unless they

are explicitly documented and agreed to by both the employer and the worker. Recruitment fees and related costs are defined by the ILO's Definition of Recruitment Fees and Related Costs.

#### Prison Labor

Any labor forced upon an individual by a government, military, paramilitary, law enforcement, penal system or other public or publicly sponsored authority is prohibited in NGP's supply chains.

#### Children and Youth

NGP requires all business partners to eliminate all forms of forced child labor and to address any other risks related to the employment of children and youth in supply chains.

NGP uses the International Labour Organization's definition of child labor as, "work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development." Child Labor is a type of forced labor that specifically refers to work, hazardous or not, that is mentally, physically, socially or morally dangerous and harmful to children and interferes with schooling or deprives them of the opportunity to attend school. This includes: 1) Any child below the minimum working age engaged in non-light work (under 15), and 2) Juvenile workers (under 18) engaged in hazardous work.

NGP expects all Business Partners to comply with local, state, and federal laws regarding Child Labor, and must not take part in any form of Child Labor as specified by the International Labour Organization (ILO) Conventions No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labor).

#### **NGP'S MANAGEMENT**

To enforce the principles in this policy, NGP commits to putting management strategies and systems in place for the company and its Business Partners to follow to eliminate forced labor from its supply chain.

#### **NGP includes the following measures:**

- Establishing clear policies regarding forced labor and humane treatment of workers
- Identify and assess potential risks within our supply chain
- Require training of all relevant staff on recognizing forced labor, and managing to enforce NGP's policies
- Conducting audits of all Supplier's Forced Labor policies and procedures
- Providing workers the ability to raise grievances confidentially and providing Suppliers the ability to report and correct violations.
- Aligning anti-Forced Labor policies with new business partners prior to commencing business.

**REPORTING PROCEDURES**

NGP takes all violations and allegations of forced labor seriously. Each report, whether reported by an employee, business partner, or other stakeholder, will undergo a thorough investigation for the protection of the workers and the companies' compliance ability. Retaliation against a worker reporting forced labor conditions will not be tolerated.

NGP asks Suppliers to immediately notify NGP of any violations of this policy or the principles above that are found in the Suppliers' operations or their supply chain's operations, along with a corrective action procedure to become in compliance. NGP will review the claim and determine the next steps. NGP may terminate its relationship with any supplier that violates this policy.

*"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, for the reporting year listed above."*

Full Name: PAUL LOUVE  
Title: CFO  
Date: 5/29/2024

"I have the authority to bind 'National Guard Products'",  
Signature: 



## SUPPLY CHAIN SOCIAL COMPLIANCE SYSTEM

NGP Companies, (“NGP”), will follow the process outlined below to assess and mitigate risk of any forced labor practices within their or their supplier’s supply chain. NGP identifies forced labor as a violation of human rights, which will not be tolerated in their value chain’s practices.

### Step 1: Engage Stakeholders

NGP will engage company employees, facility worker, suppliers, community, organizations, shareholder and investors during the creation, training, use and modifications of the following:

- Code of Conduct
- Risk Assessment
- Training
- Communication
- Auditing, Independent Monitoring, and Verification
- Remediation
- Public Reporting

NGP will review the above process with existing and new suppliers to ensure value alignment.

### Step 2: Assess Risks and Impacts

NGP will assess risks and impacts by gathering assessment information on child and forced labor, identify risks and vulnerable groups within its supply chain, integrate worker feedback and systemize data collection. NGP will use data from resources such as the U.S. Department of Labor, as it learns added information or while capturing data from the supplier workforce during audits.

### Step 3: Develop a Code of Conduct

NGP will use the principles within the Forced Labor Policy document as the code of conduct for all suppliers to follow.

### Step 4: Communicate and Train Across a Supply Chain

NGP will communicate all aspects of the policy to each of its suppliers, either through formal or in-formal training sessions. NGP will give suppliers time to review the policy and provide feedback. NGP will document and address all supplier questions.

In addition, NGP will provide Forced Labor Policy, Social Standards Code of Conduct, and Mitigation process training, to the production and supply chain team members, periodically, and

new hires, within their first 30 days, to better identify and report any form of possible forced labor.

NGP requires suppliers to issue a statement to NGP on their stance on Forced and Child Labor, along with their policy and mitigation process.

#### **Step 5: Monitor Compliance**

NGP will monitor compliance by either creating a grievance mechanism or social audit. NGP will monitor compliance periodic social audits that will occur randomly throughout the year by NGP during supplier visits, third party audits and through documentation of the supplier's Human Right's policies and processes.

#### **Step 6: Remediate Violations**

NGP will issue Corrective Action Plans (CAPs) for all identified violations. The CAP will focus on what is best for the affected workers. NGP will allow the supplier 90 days to correct the violation. If NGP finds the violations corrected, NGP will consider the CAP closed. If not corrected, NGP reserves the right to find a new supplier. During the CAP process and/or the resourcing period, the vendor must support NGP.

#### **Step 7: Independent Review**

NGP may conduct audits through independent reviews or independent third-party verification. NGP may also require suppliers to qualify for certification programs, or to present policies of their own that represent their stance on Forced and Child Labor.

#### **Step 8: Report Performance and Engagement**

NGP may publicly report to the community and multi-stakeholders the code of conduct, risk assessment, training, auditing, remediation, independent verification, and efforts to address root causes.



## NGP COMPANIES SOCIAL CODE OF CONDUCT

National Guard Products uses the Social Code of Conduct to protect the human rights of all workers at any point in our supply chain.

All NGP Companies and its suppliers and business partners are held to the following standards:

- **Act in compliance will all applicable laws and regulations** first and foremost. Where local laws and regulations conflict with international standards, our business partners shall abide by the principles that provide the highest protection to the workers.
- **Zero-tolerance of any form of discrimination.** This includes discrimination in hiring, promotions, training, and termination based on gender, age, religion, race, caste, social background, ethnic and national origin, disability, nationality, membership of workers' organizations, political affiliation, sexual orientation, or any other personal characteristics.
- **Maintain wage compliance** as mandated by the government's minimum wage legislation. All laws regarding wage deductions, loans, and advances must be followed. Individual wage information must be transparent to employees and wages must be paid on time.
- **Establish Safety Standards** to ensure employees are equipped with proper Personal Protection Equipment (PPE) and are trained to work safely in their area.
- **Provide workers with clear expectations** and understandable information about their rights and responsibilities (such as an employee handbook), before entering employment. Workplace practices and conditions which violate basic human rights are not tolerated.
- **Zero-tolerance of child labor** as defined by the International Labor Organization (ILO), whereby underage workers shall be no younger than 15 years of age, and younger than 18 years of age if working in potentially hazardous conditions, unless the exceptions recognized by the ILO apply. We expect our business partners to adhere to those standards/laws which are most stringent.
- **Zero-tolerance for any form of Forced Labor**, including but not limited to, servitude, forced, bonded, indentured, trafficked, or non-voluntary labor. NGP defines these actions as "forced labor" and is a violation of basic human rights. Please see our forced labor policy for more details.
- **Zero-tolerance for corruption, extortion, embezzlement, or bribery** the promising, offering, giving, or accepting of any improper monetary or other incentive. We expect our suppliers and business partners to maintain accurate records and information regarding their activities, structure, and performance.
- **Act with due diligence** and develop necessary management systems, policies, and processes to effectively prevent and address any human rights impacts that may be detected in the supply chain.

The above standards serve as the minimum expectation for our suppliers and business partners to follow. If a supplier reports to be out of compliance with a standard, NGP will ask for the supplier to submit its corrective action. Based on the review and severity of the non-compliance, NGP may choose to terminate its relationship with the supplier in violation.



