

## Overview

This report is published by **Pilkington Glass of Canada Limited** and **Pilkington North America, Inc.** (the "Companies") pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year beginning April 1, 2023 and ending March 31, 2024.

The Companies acknowledge our responsibility to combat forced and child labour and are committed to acting ethically and with integrity and transparency. This Report sets out our actions to identify and understand any forced labour or child labour risks related to our business and describes policies and processes the Companies has in place to combat these potential risks in our business and supply chains.

## Our Business

The Companies are a subsidiary of the Nippon Sheet Glass Group ("NSG"). NSG is a producer of glass and glazing product. Some of NSG's operations are in North America (the United States and Canada), operating as Pilkington Glass of Canada Limited and Pilkington North America, Inc. The Companies manufacture and market glass and glazing products for the architectural and automotive markets.

## Our Supply Chains

The Companies procure goods and services in a strategic and thoughtful manner to foster transparent relationships and to engage with all suppliers in an ethical and socially responsible way. Our supply chains include the sourcing of raw materials, packaging supplies, machinery, and other direct materials. This supply chain is managed by our Group Procurement, which operates as a single global function, structured across all Business Lines.

## Policies and Due Diligence Processes

The Companies implement the following policies, which apply to all Companies and Businesses where NSG Group owns 50% or more of the shares and exerts full management control, to mitigate the risk of forced labour and child labour in its businesses and supply chains:

*Code of Ethics:* NSG's Code of Ethics clearly sets out the high standard of behaviour the Companies expect from all officers, directors and employees. The Code of Ethics requires all Company representatives to comply with all applicable laws, rules and regulations in the jurisdictions where the Companies operate and specifically prohibits engaging in or supporting forced labour. All employees with NSG Group email addresses are required to receive training on the Code of Ethics upon hire during onboarding. The Companies also provide an Ethics and Compliance Hotline which empowers stakeholders to raise any concerns relating to the Code of Ethics



and is committed to investigating and addressing any concerns raised. All reported violations of the Code of Ethics are reported to the NSG Group Audit Committee.

*Human Rights Policy:* The NSG Group Human Rights Policy reflects our commitment to comply with national and local laws and respect internationally recognized human rights wherever we operate. This policy further outlines our commitment to data privacy, equal treatment of all individuals, fair wages, and freedom of association as well as our policies against harassment, abuse of labour and child labour.

*Supplier Code of Conduct:* NSG Group will not engage with suppliers who apply or support forced labour. NSG Group's Supplier Code of Conduct sets out behaviours, procedures and processes that suppliers must follow and outlines the minimum standards we expect from our suppliers. Its contents have been communicated to all existing and new suppliers. The Code includes key areas such as Anti-Forced and Child Labour and all NSG suppliers are responsible for following the principles of the Code.

The Companies also mitigate the risk of forced labour and child labour in its business through various due diligence processes: (a) background checks and verification of identity for every prospective employee; (b) requirement of suppliers and service providers to undertake request for proposal processes for significant projects, which enables the Companies to further evaluate its suppliers and service providers; and (c) contract processes and controls to require suppliers and service providers to comply with all applicable laws in the course of performing their duties for the Companies.

### **Risk Assessment**

The Companies have not identified any risks related to any aspects of its activities or supply chains.

### **Remediation Measures**

NSG Group has established a whistleblowing process that encompasses the reporting of various forms of misconduct through our Ethics and Compliance Hotline. This reporting mechanism is accessible to all NSG employees, including employees of NSG-controlled entities such as the Companies, as well as external customers and suppliers. Where allowed by local laws, reporting may be done anonymously. Reports that are submitted through the Ethics and Compliance Hotline, a telephone reporting line and website run by an independent service provider, are forwarded to designated individuals within the Companies for investigation. The phone numbers for this hotline are posted in all NSG Group locations and also appear on our website.



In 2024 we will look for opportunities to establish remediation measures for the 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.

### **Training**

The NSG Group Code of Ethics training includes sections on forced labour and child labour. All employees with NSG Group email addresses are required to complete this training as part of their onboarding.

### **Assessing Effectiveness**

NSG Group utilizes a third party platform – EcoVadis – to assess supplier sustainability based on four key categories. These are: environmental impact, labor, and human rights standards, ethics, and procurement practices). Through this platform we can pro-actively identify any risk related to human rights.

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.

I have the authority to bind "**Pilkington Glass of Canada Ltd**" and "**Pilkington North America, Inc.**" .



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Name: Marcello Rodrigues de Freitas

Title: Vice President & Treasurer

Date: 5/30/2024