



FORCED LABOUR AND CHILD LABOUR REPORT 2023

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INTRODUCTION

As a leading designer and manufacturer of windows and doors for projects across Canada and the USA, Starline Windows is committed to upholding the highest standards of ethical conduct and corporate responsibility. At the core of our operations lies a steadfast dedication to respecting labor laws, safeguarding human rights, and fostering a workplace culture founded on integrity and fairness.

The following report encapsulates our efforts and initiatives undertaken throughout the year 2023, from January to December, to address the critical issue of forced labor and child labor within our supply chains, preparing this report with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act; Recognizing that these practices are fundamentally incongruent with our values and vision, we have implemented a comprehensive array of measures aimed at prevention, detection, and remediation.

Throughout this reporting period, Starline Windows remained steadfast in our commitment to ensuring that every aspect of our operations, from design to delivery, aligns with our ethical principles. As a company deeply rooted in the communities we serve, we recognize the imperative to promote dignity, safety, and fair treatment for all individuals involved in our supply chains, looking to prevent and fight modern slavery.

This report serves as a transparent account of our actions and achievements in combating forced labor and child labor, underscoring our unwavering dedication to upholding human rights and fostering sustainable, responsible business practices. Through collaborative efforts and continuous improvement, we remain steadfast in our mission to create a world where every individual is treated with respect, dignity, and equality, while actively working to prevent and mitigate the risks of modern slavery.

STRUCTURE, BUSINESS, AND SUPPLY CHAIN

Starline Windows Ltd is a vertically integrated company specializing in the design, manufacturing, and installation of high-quality windows and doors. Our operations encompass multiple facilities located across Canada, where we utilize advanced technologies and skilled craftsmanship to produce, ship and install our products.

In terms of supply chains, Starline sources raw materials and components from various suppliers all over the world. These raw materials are essential for our manufacturing processes and play a critical role in the quality and performance of our finished goods. Additionally, we maintain strong relationships with logistics partners to facilitate the export of our products to the USA market.

In ensuring transparency across all its processes, Starline meticulously adheres to both national and international regulations. We steadfastly oppose child labor and forced labor practices, aligning our operations with the most stringent standards to protect human rights and uphold ethical principles. It is our unwavering commitment to ensure that all aspects of our supply chains, from sourcing raw materials to delivering finished products, comply with applicable national and international regulations. By promoting responsible practices throughout our supply chains, we strive to create a network of partners who share our commitment to ethical conduct and compliance with all relevant legislation and standards.

By integrating vertically and strategically sourcing raw materials from reputable Globally suppliers, Starline Windows Ltd ensures the quality and integrity of our products while contributing to the ethical and sustainable management of our supply chains.

POLICIES AND DUE DILIGENCE PROCESSES

Policy on Human Rights and Modern Slavery

At Starline Windows, we are committed to upholding the highest standards of ethical conduct and corporate responsibility. Our policies serve as a reflection of our values, following the international Labour Organization Conventions, Local Human Rights Laws, and United Nations' Guided for Human Rights, setting a stringent framework for ourselves, suppliers, partners and employees. We unequivocally denounce modern slavery, and report violations, including forced labor and child labor, within our supply chain and seek to address and eliminate these practices through comprehensive measures, respecting and protecting the human rights of all the national, migrants and temporary workers.

Our Commitments:

Adherence and respect to National and International Legal Standards: Starline Windows Ltd is dedicated to upholding all applicable national and international laws, regulations, and treaties related to human rights. This includes specific prohibitions on hiring individuals under 18 years of age for positions involving hazardous work, demonstrating our commitment to combating child labor.

Code of Conduct: Respecting and protecting human rights is paramount to us. Our Code underscores the importance of upholding human rights standards in all aspects of our operations, from procurement to production, and beyond. Colleagues and Supply Chain are encouraged to apply a human rights lens when conducting business activities and making decisions, ensuring that our actions align with ethical principles.

Comprehensive Supply Chain Assessment: Our policy emphasizes a dedication to comprehensive due diligence across our supply chain. This includes sharing our values and positive impact, examining the company that is going to be our supply and that it is legal and trusted, and pinpointing potential breaches of human rights, such as instances of forced labor and child labor, within our area of influence, control, and knowledge.

Transparency and Reporting: We are focused on transparency and detecting and report any situations of forced labor or child labor within our supply chain promptly. We have channels to report violations, ensuring protection and prevention of cases of forced labor or child labor where employees and stakeholders feel empowered to report suspected cases of forced labor or child labor without fear of repercussions.

Continuous Enhancement: Our dedication to continuous improvement drives us to enhance our human rights practices and policies, particularly within our supply chain and partners. This entails actively seeking opportunities to refine supply chain practices, addressing, and preventing instances of forced labor and child labor.

These policies applies to all levels of employees, vendors, customers, and contractors, at Starline Windows Ltd. It outlines the behavior expected of all stakeholders to maintain our reputation and ethical standards. We will regularly review our policies to identify areas for improvement, supported by engaging with external stakeholders and benchmarking against evolving international human rights standards.

At Starline Windows, we stand firm in our commitment to respecting fundamental human rights and eliminating modern slavery in all its forms. Through our policies and actions, we aim to create a world where every individual is treated with dignity, respect, and equality.

RISK ASSESMENT

For Starline Windows Ltd, the sourcing of raw materials, such as glass, aluminum, and other components, from suppliers within the supply chain could pose potential risks of forced labor or child labor, particularly if these suppliers operate in regions with lower labor standards or inadequate oversight mechanisms. Moreover, subcontractors involved in transportation, logistics, or construction activities related to window installation projects may also present risks if not adequately monitored. Therefore, it is crucial for Starline Windows to assess and manage these risks throughout its business operations and supply chains, with the follow steps:

1. **Supplier Due Diligence:** Implement a robust supplier screening process to ensure that all suppliers adhere to ethical labor practices. This includes conducting thorough background checks and investigation, within our area of influence and knowledge, to assess compliance with labor laws and human rights standards.
2. **Supplier Code of Conduct:** We are establishing a clear supplier code of conduct that outlines expectations regarding labor practices, including the prohibition of forced labor and child labor. Require suppliers to sign and adhere to this code as a condition of doing business with Starline Windows.
3. **Contractual Agreements:** we are developing clauses in supplier contracts that explicitly prohibit the use of forced labor or child labor and require suppliers to certify compliance with labor laws and regulations.
4. **Training and Awareness:** Provide training to employees and suppliers on the importance of ethical labor practices and the identification of forced labor or child labor indicators. Encourage open communication and reporting of any suspicions or concerns.
5. **Supply Chain Transparency:** Maintain transparency throughout the supply chain by regularly monitoring, site visits, and reporting on labor practices. Implement systems for tracking the origin of raw materials and components to ensure traceability and accountability.
6. **Whistleblower Protection:** We have channels to report violations for employees and suppliers to report any instances of forced labor or child labor without fear of retaliation. Take allegations seriously and conduct thorough investigations when necessary.
7. **Engagement with Stakeholders:** Engage with relevant stakeholders, to stay informed about labor rights issues and best practices in preventing forced labor and child labor.
8. **Continuous Improvement:** Regularly review and update policies, procedures, and practices to address emerging risks and evolving standards. Conduct regular audits and assessments to identify areas for improvement and implement corrective actions as needed.

ACTIONS TO REDUCE AND ADDRESS THE RISK

As of the reporting period, Starline Windows has not implemented any specific measures to remediate forced labor, child labor, or loss of income within its activities and supply chains. This is because no cases of forced labor or child labor have been identified during this time. However, our commitment remains steadfast in preventing and monitoring the activities of our company and supply chains to ensure compliance with ethical labor practices. In the event that any instances of forced labor or child labor are identified in the future, our pledge is to promptly address them and implement appropriate remediation strategies tailored to each case. We remain vigilant in our efforts to uphold our ethical standards and protect the well-being of all individuals involved in our operations and supply chains.

TRAINING AND AWARENESS

Starline Windows recognizes the vital role of training and awareness in fostering a culture of ethical labor practices and preventing instances of forced labor and child labor. Throughout the reporting period, we have prioritized initiatives to educate our employees and stakeholders on the importance of ethical conduct and human rights.

With the orientation, we are implementing training programs to educate employees at all levels of the organization on recognizing, preventing, and reporting instances of forced labor and child labor, empowering employees to uphold ethical standards in their daily activities.

EFFECTIVENES

Starline Windows remains steadfast in its commitment to combat and prevent forced labor and child labor within its operations and supply chains. Through our ongoing efforts and initiatives, we have demonstrated a proactive approach to upholding ethical labor standards and safeguarding the rights and well-being of individuals involved in our business activities.

While we have made significant strides in this regard, we recognize that more can and should be done. As such, we are dedicated to further enhancing our policies, procedures, and controls to bolster our effectiveness in eradicating modern slavery in all its forms.

Moving forward, Starline Windows will continue to develop and implement additional policies and controls aimed at strengthening our anti-forced labor and anti-child labor measures. This includes extending our focus to include our supply chain partners, with whom we will collaborate closely to implement best practices and ensure compliance with ethical labor standards.

By taking a proactive and collaborative approach, we aim to create a supply chain ecosystem that is free from the scourge of modern slavery. Together with our stakeholders, we are

committed to making a tangible difference in the fight against forced labor and child labor, contributing to a world where every individual is treated with dignity, respect, and fairness.

APPROVAL AND ATTESTATION

Starline Windows has prepared this report on forced labor and child labor, in accordance with the Act, with utmost diligence and integrity. It represents a comprehensive assessment of our efforts, policies, and practices aimed at ensuring ethical labor standards are upheld throughout our operations. We attest to the accuracy and completeness of the information presented herein, which reflects our commitment to transparency and accountability. This report has undergone thorough review and approval by Lesley Noland, Chief Operating Officer, who holds the authority to attest to its contents on behalf of Starline Windows. We acknowledge the importance of addressing these critical issues and remain dedicated to continuously improving our practices to prevent and mitigate the risk of forced labor and child labor.



Lesley Noland

Chief Operating Officer

Starline Windows Ltd.