



Fighting Against Forced Labour and Child Labour in Supply Chain **Report (2024)**

ABOUT THIS REPORT

Beacon Roofing Supply Canada Company D/B/A “QXO Canada” has prepared this report (the “**Report**”) pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) for the financial year ended December 31, 2024.

QXO Canada does not report under similar legislation in any other jurisdiction.

INTRODUCTION

QXO’s unwavering commitment to strong values and good ethics is central to our role as a corporate citizen. We are committed to fostering a strong culture with a deep respect for human rights for all individuals. We acknowledge the basic freedoms inherent to all people and our ability to protect the human rights of our employees, as well as workers throughout our supply chain and the people in the communities in which we operate.

QXO Canada prohibits all forms of child or forced labour, slavery, or human trafficking in any of our operations and facilities, which includes exploitation of children or the trafficking, physical punishment, abuse, or involuntary servitude of any worker (collectively, “**Modern Slavery**”). We are committed to meeting local, state, and national laws regarding minimum employee age.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Company Structure

Effective April 29, 2025, QXO, Inc. acquired all the stock of the ultimate parent company Beacon Roofing Supply, Inc. and now does business as “QXO” rather than as “Beacon Building Products” or “Beacon Roofing Supply.” The legal entity Beacon Roofing Supply Canada Company itself remains unchanged: it continues to operate as a Nova Scotia unlimited liability company with its principal place of business in Montreal, Canada. It retains the same taxpayer identification number and banking information and is now wholly owned by its new ultimate parent company QXO, Inc., headquartered in Greenwich, Connecticut.

QXO operates approximately 600 branches through all fifty states in the United States and seven provinces in Canada. QXO serves an extensive base of nearly 100,000 customers, utilizing its vast branch network and diverse service offerings to provide high-quality products and support throughout the entire business lifecycle. In 2024, QXO Canada had approximately 270 active full time and seasonal employees.

Activities and Operations

QXO is a wholesaler and distributor of roofing materials to professional contractors and dealers. In Canada we operate 22 branches across seven provinces, including: Alberta; British Columbia; Nova Scotia; Ontario; Quebec; Saskatchewan and New Brunswick. Approximately 3.0% of QXO’s total net sales for 2024 was derived from sales to customers in Canada, totaling approximately \$296.7 million USD.

Products

The product lines we carry are designed to meet the requirements of our residential, non-residential, and complementary building products customers. We carry one of the most extensive arrays of high-quality branded products in the industry, including our private label brand, TRI-BUILT®. Our [TRI-BUILT® products](#) offer a high-quality and superior-value alternative for our customers. We fulfill most of our warehouse orders with inventory on hand because of the breadth and depth of the inventory at our branches.

In the residential market, asphalt shingles comprise the largest share of the products we sell. In the non-residential market, single-ply membranes, insulation, and accessories comprise the largest share of our product offering sales. In complementary building products, waterproofing, siding, plywood/OSB, and windows and doors comprise the largest share of the products available in our portfolio.

Delivery

In 2024, our distribution infrastructure in Canada served more than 31,542 customer deliveries. We maintained a Canadian fleet of 73 straight trucks, 19 tractors, and 41 trailers. Nearly all of our delivery vehicles are equipped with specialized equipment, including 91 truck-mounted forklifts, cranes, hydraulic booms, and conveyors, enabling us to deliver products to job sites efficiently, safely, and in accordance with our Canadian customers' requirements.

Our Supply Chains

QXO is a key distributor for our suppliers driven by our industry expertise, scale, consistent growth, financial strength, and the substantial volume of products we distribute. We maintain strong relationships with numerous manufacturers of roofing materials, complementary building products, and exterior waterproofing products to reduce dependence on any single supplier, maintain purchasing leverage and ensure broad product availability across our local markets.

Through QXO Canada, our largest suppliers include: Soprema, Inc.; Carlisle Canada, ULC; IKO Industries, Ltd; Johns Manville; Certaineed Canada, Inc.; Atlas Roofing Corporation; Bitumar, Inc.; Henry Company Canada, Inc.; Owens Corning Canada, Inc.; and Malarkey Roofing Products. All these suppliers are based in North America.

POLICIES AND DUE DILIGENCE¹

Code of Ethics and Business Conduct

QXO has a Code of Ethics and Business Conduct (the '**Code**'), which applies to QXO Canada, and is publicly available on our website. The Code is a guide for our employees to live up to high ethical standards. We work every day to make sure what we do is lawful, reputable, and safe. All directors, officers, and employees of QXO, including QXO Canada, are required to take annual training and acknowledge the provisions contained within the Code.

¹ The policies and due diligence processes set out in this section are implemented at the QXO, parent corporation level, and are imposed upon and adopted by its subsidiaries including QXO Canada.

During 2024, the Code promoted five foundational Company values that extend beyond minimum legal compliance, including: Put People First, Make Every Day Safer, Do the Right Thing, Own Your Day, and Never Stop Building. These values reflect behaviours we actively measure every day and apply in our daily decision-making. The Code reinforces our commitment to treating others with respect and courtesy and transacting our business fairly. Our values will not be compromised for expediency or financial gain.

Findings of a violation or deviation from the standards embodied in the Code will result in appropriate preventative or disciplinary action, including, but not limited to, reassignment, demotion, dismissal and, in cases of potential criminal conduct or other potential violations of the law, notification of appropriate governmental authorities.

Supplier Code of Conduct

The Supplier Code of Conduct (the ‘**Supplier Code**’) is publicly available on our website, [here](#), and governs our supplier relationships. We expect that each of our suppliers, their employees, agents, and representatives, subcontractors, parent companies, subsidiaries, and affiliated entities comply with our ethical principles and the Supplier Code. The Supplier Code introduces the minimum requirements that all suppliers should meet to conduct business with QXO Canada. We expect our suppliers to embrace our commitment to integrity and strive for the highest level of integrity whenever possible. The Supplier Code outlines policies regarding child labour and forced labour, including standards for working hours and compensation, compliance with international laws and regulations, and health and safety requirements in the workplace.

Suppliers are expected to keep accurate records to show compliance with the Supplier Code. We expect our suppliers to provide complete and accurate information, and we reserve the right to verify compliance with the rules set forth in the Supplier Code with each supplier, including through a questionnaire or an audit. We expect that our suppliers will promptly correct any action or policy found to be violating the Supplier Code. Failure to comply with the Supplier Code or any applicable laws and regulations may result in the termination of any business relationship, and, where appropriate, referral of the matter to local authorities.

The Supplier Code encourages reporting any questionable behaviour or possible violations of the Supplier Code through our Hotline (discussed further below). We maintain the confidentiality of the Hotline reports to the extent possible and strictly prohibit any form of retaliation against individuals who, in good faith, seek advice or report suspected misconduct or violations of the Supplier Code.

People First Policy

Our values lead us to put people first in working with all stakeholders. We are committed to fostering a strong culture with a deep respect for human rights and for the basic freedoms inherent to all individuals. This commitment includes not only our employees, but also workers throughout our supply chain and in the communities we operate. The Policy reinforces that our commitment to protecting and promoting human rights is informed not only by our core values, but also by industry best practices and certain principles described in the United Nations Universal Declaration on Human Rights and the United Nations Guiding Principles on Business and Human Rights.

Our Policy affirms our commitment to prohibiting all forms of Modern Slavery and to complying with local, state, and national laws regarding minimum employment age. Further, we pay wages

that meet or exceed the legally mandated rates or, where no wage laws exist, align with local industry standards.

The Policy sets out our commitment to providing a safe working environment and to proactively engaging and training employees to recognize and avoid potential workplace hazards and risky behaviours before they occur. We also use monitoring and goal setting to advance our objective of maintaining an injury free workplace. Employees are expected to comply with regulations and to incorporate our safety training into their daily work routines to remain part of our team.

Finally, the Policy acknowledges our responsibility to work with suppliers who share our values. Accordingly, our suppliers are expected to respect internationally recognized human rights standards. This People First Policy aligns with our broader commitment to safety as our top operational priority, supports our regulatory compliance program, and reinforces the expectations outlined in our Supplier Code.

QXO Hotline

QXO's Hotline (the “**Hotline**”) is provided to our directors, officers, employees, customers, suppliers, and others in a business relationship with QXO and QXO Canada who wish to report potential concerns or violations of the Code, Supplier Code, Company policies, or the law. The Hotline is operated 24 hours a day, seven days a week, 365 days a year, and reports may be submitted online or through the telephone. More information is available in the Code of Ethics and Business Conduct and on the Portal website, [here](#).

Employees who report violations of the law or the Code may choose to remain anonymous or identify themselves to facilitate follow-up communication. Investigators take reasonable precautions to keep a reporter's identity confidential, consistent with conducting a thorough and fair investigation.

We review and address concerns, as appropriate, through a comprehensive internal process. QXO does not tolerate any form of retaliation against anyone who makes a good faith report of known or suspected acts of misconduct or other violations of Company policies or laws.

POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

Potential Risks in Our Operations

QXO Canada considers the risk of Modern Slavery within our operations to be low, based on the nature of our workforce and the policies and procedures we have in place to ensure fair working conditions and the ethical treatment of our employees. From a geographical risk perspective, our employees are in Canada, a country with a low prevalence of child and forced labour, low vulnerability to such practices, and a strong governmental framework to prevent and address child and forced labour.²

Potential Risks in Our Supply Chains

We recognize that there is a risk of Modern Slavery occurring within supply chains. We understand that certain geographic regions, raw materials sourcing and certain industries may carry a higher

² Walk Free, Global Slavery Index 2023, found [here](#).

risk of Modern Slavery. Additionally, some sectors may pose elevated risks even within countries generally considered to have lower prevalence of Modern Slavery. We view the risks of Modern Slavery in our supply chains as low based on the location of our suppliers and the specific materials we purchase.

Based on the risk assessment and due diligence processes described in this report, we acknowledge potential risks of Modern Slavery may exist regardless of our procurement practices, due to factors such as industry, product type and country of origin.

Through our assessment of our operations and supply chains regarding the risk of Modern Slavery being used, we did not identify any instances of Modern Slavery. Accordingly, no steps were required to remediate Modern Slavery, or the loss of income associated with remediation efforts.

Management and Mitigation of Potential Risks

We understand that there is always room for improvement and are committed to continuous progress in how we serve our stakeholders and communities. We believe that being a good corporate citizen is not only the right thing to do but also a core part of who we are. We are proud to contribute our time and resources through charitable giving and industry leadership to support those around us. We partner with charitable organizations that have deep roots in the communities we serve to help us direct our support where it has the greatest impact.

Our Board of Directors has oversight of risk, including policies and initiatives related to corporate social responsibility, which encompasses human rights and ethical business practices.

Most of our branches in Canada are in industrial zones where adjacent neighbourhoods may have historically received inequitable socio-economic investment and may be under-resourced. We have created a community impact framework focusing on healthy families and safe environments. The programs in Canada in 2024 included:

- *QXO Hope Outreach Program*: Our campaign, which spans across the United States and Canada, helps veterans facing adversity by ensuring they have a safe place to live. We provided roof installations to two Canadian grand prize winners (out of 10 winners corporation-wide) and have continued the campaign in 2024. To date, nearly 60 veterans in North America have benefitted from this program.
- *National Women in Roofing (NWIR)*: In 2021, QXO Canada was instrumental in launching the first ever NWIR Council in Canada and QXO Canada employees remain active in the organization.
- *Canadian Roofing Contractors Association*: QXO Canada supports this organization, which advances the roofing industry through education, research, technology, and scholarship programs.
- *Female Roofing Professional of the Year*: QXO created this North America competition in which the public nominates a female in the industry who has faced adversity and gone above and beyond for a customer, co-worker, or her community. The company awards one grand prize winner and four finalists with monetary grants to support their businesses and professional efforts, along with public recognition for their achievements and operations.

We oppose human rights abuses and seek to source products and materials from companies that share our values. We have established and maintain appropriate procedures to evaluate and select suppliers and contactors based on our core values, People First Policy, environmental policies, and supplier qualification process. We believe in the protection of human rights, and that all individuals should be treated fairly, with dignity and respect. We engage our suppliers in this commitment by requiring them to produce products in factories that adhere to responsible sourcing standards. QXO strives to integrate respect for human rights into our practices wherever we do business, including throughout our supply chain.

Additionally, we support industry-wide efforts to identify, reduce, and eliminate the use of conflict minerals. Our suppliers are expected to supply conflict-free materials and products, to establish their own conflict minerals policies, and to have or develop due diligence frameworks and management systems to prevent conflict minerals from being included in products sold to us.

TRAINING

In 2024, in addition to achieving a 94% completion rate on our annual compliance training campaign, we had more than 2,100 employees complete leadership and sales-related training programs. We also require all employees to complete annual training on prevention of workplace harassment and discrimination.

We encourage continuous training opportunities for our employees to build a more skilled workforce. Required annual QXO training courses include health and safety awareness; anti-corruption training; data security and privacy training; and sexual harassment prevention training.

We also offer professional development trainings to all our employees, helping them build management skills, product knowledge, and operational proficiency. We use feedback from employee surveys to judge effectiveness and further develop our training programs.

ASSESSING EFFECTIVENESS

This Report assesses our effectiveness in ensuring that forced and child labor are not present in our business operations or supply chains. We understand the risks of modern slavery associated with certain industries, geographic areas, and working environments. In 2024, we provided all employees with guidance on basic human rights and the requirement to treat individuals ethically, in accordance with our corporate policies. Through continued education and engagement, we aim to raise awareness and drive action toward eradicating modern slavery.

APPROVAL & ATTESTATION

This Report was approved by the Board of Directors of Beacon Roofing Supply Canada Company on May 30, 2025.

In my capacity as a Director of Beacon Roofing Supply Canada Company, and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

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 Beacon Roofing Supply Canada Company

Christopher Signorello, Chief Legal Officer
Beacon Roofing Supply Canada Company
May 30, 2025