

W.R. Meadows of Canada Company

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT (2024 REPORT)

1. Introduction

This report constitutes the first report prepared by W.R. Meadows (via W.R. Meadows of Canada Company) pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. (the "Act").

This report relates to the steps taken by W.R. Meadows to identify, prevent and reduce the risk that forced labour and/or child labour is used at any step of the production of our goods in Canada or elsewhere or of the goods that we imported into Canada for the financial year ended on December 31, 2024 (the "Reporting Period").

2. Activities, Supply Chains and Structure

Structure

W.R. Meadows parent company is W.R. Meadows, Inc. a Delaware Corporation with its principal place of business in Hampshire, IL. W.R. Meadows main presence in Canada is through W.R. Meadows of Canada Company, a Nova Scotia Unlimited Liability Company located in Halifax, Nova Scotia. W.R. Meadows of Canada Company is the majority owner of W.R. Meadows of Canada, an Ontario General Partnership with its principal place of business in Milton, Ontario. W.R. Meadows of Canada is the majority of owner of W.R. Meadows of Western Canada L.P., an Alberta Limited Partnership, with its principal place of business in St. Albert, AB. (Hereinafter collectively referred to as "W.R. Meadows").

Activities

W. R. Meadows. designs, manufactures, and markets high quality building materials for today's construction professionals. Products are sold through our authorized distribution network. We're a family-owned and operated company focusing on product quality, outstanding service, and business integrity since our founding in 1926.

We remain committed to producing high quality products and systems that meet or exceed the latest regulations. From highway construction and repair, building construction and restoration, to waterproofing/vaporproof/air barrier products and more, we've been satisfying the needs of the public and private sector of the building construction industry for over 99 years.

Product categories include:

Building Envelope
Construction Liquids
Concrete Restoration
Concrete Expansion Joints
Joint Sealants

For purposes of reference, here is an overview of the products offered by W.R. Meadows:
www.wrmeadows.com/wrm-product-categories/

Supply Chain

W.R. Meadows sources raw materials and products primarily from the U.S. and Canada. W.R. Meadows suppliers are chosen based on our understanding that they are reputable and conduct their business in a lawful manner in accordance with our Ethics Policy, as well as in conformance with all local and international laws. In 2015, as part of our report pursuant to the California Transparency in Supply Chains Act, we conducted a risk assessment of our supply chain based on the U.S. Department of State Trafficking in Persons Report. This assessment found that the majority of our suppliers are located in the U.S. and other Tier 1 countries considered low risk (e.g., Canada, Germany, Italy, Portugal and Japan). In fact, approximately 97% of our suppliers are from the U.S. or Canada. Because of the low risk, we have not employed a third party for verification/audit.

3. Policies and Due Diligence Process

W.R. Meadows is committed to a continual process of honest introspection regarding our corporate practices and policies. Compliance with the law, honesty, and integrity are key to our culture and extends to our selection of supply chain partners. We recognize the importance of ensuring that our supply chain is free of any products not conforming to the intent of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. W.R. Meadows is committed to responsible sourcing and, specifically, the eradication of forced labour and child labour in our supply chain.

W.R. Meadows' Ethic's Policy is core to who we are as a company and guides all of our decisions. Per our Ethics Policy, we promote "an organizational culture that encourages ethical conduct and a commitment with compliance to the law. It is the personal responsibility of every W.R. Meadows employee and agent to observe the standards of W.R. Meadows' Code of Business Conduct. Ethics are the internal conductor of our moral principles, values and beliefs that we use to construe different conditions and then make up our minds on what is the correct behavior."

Of the eight guiding principles in our Ethics Policy, three of them are especially instructive and helpful to W.R. Meadows' mission to identify and remove Forced Labour and/or Child Labour, if it were found, in our supply chain:

- a. Ethical Issues are pivotal to the way W.R. Meadows and our managers make decisions.
- b. Compliance with the law, honesty and integrity in our dealings with others are not to be sacrificed in the name of profit.
- c. The values of W.R. Meadows encourage open and honest communication where all employees understand the importance of demonstrating ethical behavior in all we do.

W. R. Meadows expects all its business partners, including suppliers, to adhere to the same values shared by W. R. Meadows and its employees and depend on our suppliers to audit their operations for compliance. Because of the low risk in our supply chain, we do not currently audit suppliers for compliance. However, if a supplier was determined to be medium or high risk, we would consider requiring additional procedures to ensure compliance.

4. Risks of Forced Labour and Child Labour in Our Operations and Supply Chain

While W.R. Meadows has not begun a formal process to assess the risk of forced labour and/or child labour in our operations and supply chain, we believe that the risk for both is low. Our operations are in the U.S. and Canada and adhere to the laws of those two countries, including this Act and the California Transparency in Supply Chain Act. Further, we do not employ anyone under the age of 18.

As the overwhelming majority of our suppliers are located within the U.S. and Canada, and therefore subject to the laws of those two countries, including this Act and the California Transparency in Supply Chain Act, the risk of forced labour and/or child labour in our supply chain is low. Further, we expect all its business partners, including suppliers, to adhere to the same values shared by W. R. Meadows and its employees and depend on our suppliers to audit their operations for compliance. Because of the low risk in our supply chain, we do not currently audit suppliers for compliance. However, if a supplier was determined to be medium or high risk, we would consider requiring additional procedures to ensure compliance. If we were to find forced labour and/or child labour in our supply chain, we would remove it.

5. Remediation Measures

During the reporting period, W.R. Meadows did not identify or receive any reports that there was forced labour and/or child labour in our operations or supply chain. As a result, we have

not had to take any measures during the reporting period to remediate forced labour and/or child labour from our operations or supply chain. If we were to identify or receive reports of forced labour and/or child labour, we would remove them from our operations or supply chain.

Similarly, as we have not identified or received any reports of forced labour and/or child labour in our operations or supply chain, we have not had to take any measures to remediate loss of income to vulnerable families.

6. Training

W.R. Meadows has not yet begun to offer formal training to its employees concerning forced labour and/or child labour. However, we are considering offering training to each employee having direct responsibility for supply chain management on identifying and mitigating the risk of forced labour and/or child labour.

7. Assessing the Effectiveness of Our Actions

While W. R. Meadows has not identified any risks or incidents of forced labour or child labour in our supply chain in the reporting period, W. R. Meadows experience before the reporting period shows that our systems are effective in identifying and mitigating the risk of forced labour in our operations.

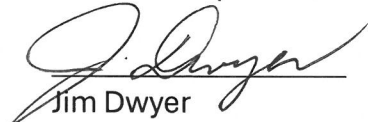
In 2022, we identified that a manufacturer in China who supplied W.R. Meadows with an ingredient used in our products was being investigated for suspected forced labour and/or child labour. We removed the manufacturer from our supply chain and took the necessary actions to formulate our products without the manufacturer's product. This is one of our Guiding Principals at work: Compliance with the law, honesty and integrity in our dealings with others are not to be sacrificed in the name of profit. This incident demonstrates that W. R. Meadows is effective in identifying and removing risks of forced labour and child labour from our supply chain, to the point of reconfiguring our products to reduce said risk.

That being said, as we have just begun this process, W.R. Meadows does not believe we are in a position yet to conclusively assess the effectiveness of the actions we have taken to identify, prevent and/or reduce the risk of forced labour and/or child labour in our operations and supply chain. We will continue to evaluate and review our policies and training pertaining to forced labour and/or child labour in order to identify opportunities for improvement and enhancement.

8. Approval and Attestation

This report was approved by the Board of Directors of W.R. Meadows of Canada Company on behalf of W.R. Meadows of Canada Company and W.R. Meadows of Canada in accordance with Section 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains 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 on behalf of the governing body of the 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.



Jim Dwyer

Chief Executive Officer

I have the authority to bind W.R. Meadows of Canada Company

May 30, 2025