

**BLUELINX HOLDINGS INC.  
FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS  
ANNUAL REPORT FOR FINANCIAL YEAR 2025**

**PURPOSE**

This report has been prepared by BlueLinx Holdings Inc. in accordance with the requirements of Canada's Ministry of Public Safety, the Fighting Against Forced Labour and Child Labour in Supply Chains Act, Section 11, and pertains to activities occurring within the financial year ended January 3, 2026.

Hereinafter, BlueLinx Holdings Inc. may be referred to simply as "BlueLinx" or the "Company" and any references thereto shall be understood to mean BlueLinx Holdings Inc., its operational entity, BlueLinx Corporation, and its wholly owned subsidiaries, Lake States Lumber, Inc., Vandermeer Forest Products, Inc., Cedar Creek Holdings, Inc., and Disdero Lumber Co., LLC.

**INTRODUCTION**

BlueLinx Holdings Inc. is committed to responsibly and ethically sourcing the highest quality products from global suppliers that demonstrate respect for human rights, practice fair labor standards, comply with international trade laws, and demand the same of suppliers throughout their supply chains.

The policies referenced throughout this report have been informed by conventions, standards, regulations, and laws promulgated by such organizations as the United Nations, the Bureau of International Labor Affairs, the United States Customs and Border Protection, the Canada Border Services Agency, and the Canada Ministry of Public Safety.

Although global supply chains can be dynamic and complex, the basic tenets of BlueLinx's operations as they pertain to human rights remain simple: treat everyone with dignity and respect; remain committed to ethical conduct; continuously strive to improve; and deliver what matters.

**CORPORATE STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS**

**Corporate Structure**

BlueLinx Holdings Inc., a Delaware corporation, along with its operational entity, BlueLinx Corporation, and its wholly owned subsidiaries, Lake States Lumber, Inc., Vandermeer Forest Products, Inc., Cedar Creek Holdings Inc., and Disdero Lumber Co., LLC, is headquartered in Marietta, Georgia. BlueLinx Holdings Inc. trades common stock on the New York Stock Exchange ("NYSE") under the ticker symbol "BXC" and publicly reported \$3 billion in annual sales in FY 2025.

BlueLinx is governed by a traditional hierarchical structure, which includes a Chief Executive Officer, Chief Financial Officer, Chief Commercial Officer, and General Counsel & Corporate Secretary. An independent board of directors oversees and guides the Company's operations to ensure strategic planning and management performance are aligned with the Company's mission statement, and ethical and legal compliance is prioritized to protect shareholder interest. All operational, strategic, and compliance activities of the wholly owned subsidiaries are dictated and governed by the individuals, entities and structure described above.

The Company employs approximately 2,160 full-time employees throughout its corporate headquarters and 65 warehouses and storage facilities across the United States.

**Activities**

BlueLinx is a leading two-step wholesale distributor of residential and commercial building products in the United States. Two-step distributors purchase products from manufacturers and distribute those products to dealers and other suppliers in local and international markets, who then sell the products to end users. The Company carries a broad portfolio of branded and private-label stock keeping units ("SKUs") across two

principal product categories: specialty products and structural products. Specialty products include items such as engineered wood, siding, millwork, outdoor living products, specialty lumber and panels, and industrial products. Structural products include items such as lumber, plywood, oriented strand board, and rebar. In addition to specialty and structural product arrays, the Company also provides a wide range of value-added services and solutions aimed at relieving distribution and logistics challenges for our customers and suppliers.

## **Supply Chains**

### **Domestic Supply Chain**

Whenever possible, the Company procures products from domestic manufacturers and distributors across the United States to reduce lead times and support local economies. Domestically sourced products include structural lumber products, engineered wood products, siding of various materials, fencing, decking, trims, and accessories.

Certain high-volume lumber products are sourced exclusively from long-term Canadian suppliers with a deep understanding of Canada's timber regulations and environmental requirements under commercial terms that do not require the Company to act as importer of record.

### **International Supply Chain**

The Company's international supply chain includes manufacturers and distributors from regions around the globe, including North, Central and South America, Asia Pacific, and Europe. International suppliers are carefully vetted before engagement to ensure manufacturing capabilities, production capacity, product and packaging quality, and compliance activities are aligned with the Company's expectations and requirements. International suppliers are routinely visited by Company employees or designees experienced in global sourcing and supply chain operations to ensure compliance with Company standards.

Internationally sourced products include wood products, such as millwork, oriented strand board, and plywood; metal products, such as nails, bolts, clips, stakes, and rebar; and plastic products, such as ties and fasteners.

## **POLICIES AND DUE DILIGENCE PROCESSES**

### **BlueLinx Code of Conduct**

BlueLinx Code of Conduct requires company employees, directors, officers, and those subject to the code by contract or agreement when representing the Company's interests, "to conduct business in a manner consistent with the highest ethical standards and in compliance with both the letter and spirit of the law", including those laws and regulations governing international trade practices, such as the United States Code, Chapter 4, Tariff Act of 1930, Section 307, which prohibits merchandise manufactured with the use of forced or indentured labor, including forced or indentured child labor, to be imported into the United States, and the similarly purposed Canadian law, Fighting Against Forced Labour and Child Labour in Supply Chains Act.

### **BlueLinx Supplier Code of Conduct**

BlueLinx Supplier Code of Conduct applies to all suppliers that provide goods and services, directly or indirectly, to BlueLinx, including vendors, agents, contractors, subcontractors, sub-suppliers, consultants and other third-party providers acting on BlueLinx's behalf.

The code defines the minimum requirements for supplier conduct the company expects in terms of business ethics, social and environmental responsibility; however, suppliers are encouraged to exceed these requirements and align with industry best practices, wherever possible.

Prohibitions against forced labor and child labor are key elements of the code.

## **BlueLinx International Supplier Agreement**

All international suppliers are required to sign the BlueLinx International Supplier Agreement, which stipulates compliance with all trade laws and regulations, including the United States Code, Chapter 4, Tariff Act of 1930, Section 307, which prohibits merchandise manufactured with the use of forced or indentured labor, including forced or indentured child labor, to be imported into the United States, and the Uyghur Forced Labor Prevention Act of 2021. Compliance with the similarly purposed Canadian law, Fighting Against Forced Labour and Child Labour in Supply Chains Act, is implied.

## **Supply Chain Due Diligence Procedures**

Prior to engagement, prospective international suppliers are interviewed by the Director of Global Sourcing or a designee for suitability and compliance with Company standards. Suppliers that appear suitable and indicate an ability and willingness to comply with Company standards are visited by the Director of Global Sourcing or a designee at their production location(s) to assess operational transparency, general health and safety practices, manufacturing capabilities, production capacity, and basic environmental practices. Suppliers deemed suitable are referred to the Contracts Director to formally accept the BlueLinx Supplier Agreement.

Periodically or as necessary to ensure supplier compliance with Company standards, the Director of Global Sourcing or a designee will make announced or unannounced visits to the supplier's production site. Suppliers unable to demonstrate compliance with Company standards may, depending on the nature of non-compliance, be given the opportunity to perform corrective action measures. Suppliers unable or unwilling to perform the required corrective action measures will be immediately removed from the Company's supply chain.

## **FORCED LABOR AND CHILD LABOR RISKS**

Utilizing publicly available resources, including those published by the Bureau of International Labor Affairs, specifically the List of Goods Produced by Child Labor or Forced Labor published September 5, 2024, a risk assessment of the Company's supply chain was conducted by cross-referencing country locations, geographical areas of risk, and at-risk downstream goods, as defined by the report, against the Company's current international tier-one suppliers. At this time, none of the Company's international tier-one suppliers align with the country/commodity combinations noted in the Bureau of International Labor Affairs' report as high risk for forced labor or child labor.

Recognizing that supply chain risk is dynamic and ever-changing, this risk assessment exercise is repeated on an annual basis, as new suppliers and commodities are added to the company's international supply chain, and as the Bureau of International Labor Affairs or other government agencies, such as US Customs and Border Protection and Canada Border Services Agency, promulgate new information indicating locations or commodities determined to be produced with forced or child labor.

Although no supply chain, domestic or international, will ever be completely free of risk from forced labor or child labor, the Company strives to engage only those suppliers whose country/commodity combinations have not been identified by the Bureau of International Labor Affairs' report as high risk for forced labor or child labor. Suppliers whose country/commodity combinations have been identified as moderate risk may be considered; however, additional vetting measures, including increased production site visits or third-party audits may be employed.

## **REMEDIATION MEASURES**

As of the date of this report, there have been no known or reported instances of forced labor or child labor in the Company's supply chains; therefore, no remediation measures have been employed, including remediation of the loss of income.

## **AWARENESS AND TRAINING**

At the point of hire and annually thereafter, employees are required to complete various universal training courses. In addition to the universal courses, select employees, based on individual roles and responsibilities,

are required to complete advanced training courses to further their understanding of the Company's requirements in more complex areas of practice.

Employees are instructed to report known or suspected violations of the code of conduct, including ethical and legal matters related to forced labor or child labor, to the Vice President of Human Resources, General Counsel, or anonymously via the BlueLinx Ethics Hotline. Instructions to access to the BlueLinx Ethics Hotline are provided within the code and made available to interested parties on the Company's website (<https://bluelinxco.com/contact-us-old/>). As of the date of this report, there have been no known or suspected violations related to forced labor or child labor reported through any of the company's available channels.

### **ASSESSING EFFECTIVENESS**

To ensure the Company's policies, including those related to forced labor and child labor, remain relevant and well aligned with changing legal and regulatory requirements, a review of the aforementioned policies and others, is conducted annually.

Records of incidents reported to the BlueLinx Ethics Hotline are retained for a prescribed period to allow for adequate investigation and remediation, as well as to make evident any discernable patterns associated with suppliers, countries, regions or commodities.

### **APPROVAL AND ATTESTATION**

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, Christin Lumpkin, in the capacity of General Counsel & Corporate Secretary, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity, BlueLinx Holdings Inc., 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 within this report.

I, Christin Lumpkin, have the authority to bind BlueLinx Holding Inc.

DocuSigned by:  
*Christin Lumpkin*  
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\_\_\_\_\_  
Christin Lumpkin  
General Counsel & Corporate Secretary

4/9/2026  
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Date