

Annual report 2025 on the prevention of forced labor and child labor

May 2025



1.1 Maibec structure, business activities and supply chains

Maibec Inc. is a Canadian company founded in 1942, active in the field of building cladding. Formerly known for the quality of its real wood siding products, such as wainscot and cedar shingles, in recent years it has expanded its business activities into engineered siding with CanExel, and into the new multi-housing, commercial, industrial and project markets with new aluminum products.

Today, Maibec is a North American benchmark for integrated building cladding systems. We offer complete, innovative and complementary solutions, always based on superior-quality, proven cladding.

Maibec Inc. has a relatively simple organizational structure, with approximately 760 employees and a single general partnership. This report covers Maibec Inc. Within Maibec Inc. we have several physical locations (plants - Quebec, New Brunswick, Nova Scotia) that are not shown here but are covered in this report.



Maibec's procurement department is made up of a Corporate Procurement group, which controls major accounts and supports local buyers in the plants. Suppliers are selected by Corporate Procurement and Accounting. The majority of suppliers are Canadian (83%), American (8%) and 9% other. The supply chain is relatively stable, with little change from year to year.

1.2 Due diligence policies and processes relating to forced labor and child labor

Appendix A contains our procedure covering forced labor and child labor.

It will be reviewed annually by the Corporate Procurement Group, which is responsible for its application.



This policy has been refined for greater precision in 2025.

1.3 Assessment of our supply chain

1.3.1 Year 1 - 2024

In 2024, our approach used by Maibec to evaluate our supply chain focused on four areas:

- 1. Defining risk categories
- 2. Carry out an annual survey of suppliers and define their risk category
- 3. Make a more detailed assessment of suppliers at greater risk
- 4. Review and establish action plans to reduce risks in the supply chain

Appendix C contains the complete approach taken in 2024 to establish the basis for our valuations.

1.3.2 Year 2 - 2025

In 2025, we continued our evaluation of active suppliers, segmenting them by purchasing volume.

This table contains the answers for the suppliers to whom we sent the evaluation and certification form.



Importance of supplier in	Risk	Sent to suppliers 2025	Replies received from suppliers: compliant	Replies received from suppliers: not compliant	Confirmations received from suppliers - no need to fill in a form (e.g.: a distributor, a service)	Responses not received from suppliers
First wave (\$100,000+)	Low	50	41	0	4	5
	Medium	1	1	0	0	0
	High	2	2	0	0	0
Second wave: \$1,000 to \$99,999 \$	Low	165	95	0	27	43
	Medium	2	2	0	0	0
	High	2	2	0	0	0
Total:		222	143	0	31	48

1.3.2.1 Analysis of results

- Out of 222 forms sent out, we have received 174 forms/responses and are waiting for 48 (22%), the majority of which are from the second wave of small suppliers.
- All medium- and high-risk suppliers responded (no non-responses in these categories).
- The non-received responses come exclusively from low-risk suppliers, especially in the second wave.
- No supplier was identified as non-compliant, which is very positive.
- Confirmations of irrelevance are more frequent in the second wave, which is logical given the more diversified nature of small suppliers.

1.3.3 2025 in brief

The following table collates all the data on our suppliers who were contacted in 2024 and 2025.



	Compliant	Not included in volume or service type criteria	Inactive in 2025	Total quantity
High risk	4	0	1	5
Medium risk	4	0	1	5
Low risk	196	1427	513	2136
Total quantity	204	1427	515	2146

1.3.3.1 Results analysis

- Medium and high risks are very marginal (only 5 cases each).
- Low risk dominates with 2136 cases out of 2146 (almost 99.5%).
- We didn't deal with 1 high and 1 medium risk this year.

1.4 Remedial measures

No remediation measures are required for high-risk suppliers.

1.5 Measures to remedy income losses for the most vulnerable families No remediation measures are required for high-risk suppliers.

1.6 Employee training on forced labor and child labor

Maibec has a well-established learning management system, with information and training capsules imposed on our employees on a regular basis. This enables us to impose specific training on specific groups of employees and measure its success.

As of May 31, 2025, specific training on Bill S211 was developed by Maibec (INF-039 Loi S-211/INF-039 Bill S-211). This training was given in both official languages.



Training	Registered users	Users who have taken the training	% complete
INF-039 Law S-211 French	121	109	90 %
INF-039 Bill S-211 English	11	11	100 %

The 12 people who did not complete the training are staff who have left their positions (retirement, leaving the company, illness, etc.) or have been reassigned to a position that does not require this training.

Training is now part of the induction curriculum for all positions in contact with procurement and suppliers.

1.7 Evaluating the effectiveness of our efforts

Each year, the corporate procurement group will issue a country register of our suppliers to verify the provenance of our purchases.

Each supplier will be assigned to a risk category.

The list of suppliers requiring further assessment will be maintained and used as an action plan to ensure compliance with the law.



1.8 Certification and signature

In accordance with the requirements of the Act, and in particular section 11 thereof, I certify that I have reviewed the information contained in the Report for the entity or entities listed above. To the best of my knowledge, and having exercised due diligence, I confirm that the information contained in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year referred to above.

I have the power to bind Maibec inc.

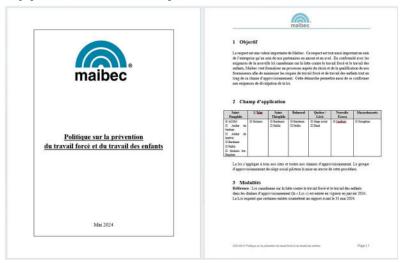
Signature:

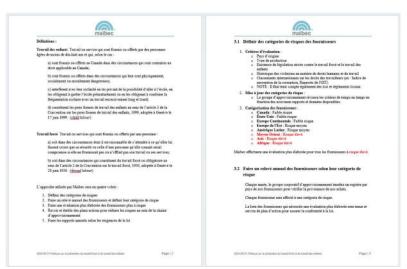
Vice-President, Operational Excellence, responsible for the supply chain

Date: May 31, 2025



Appendix A - Policy on forced labor and child labor









Appendix B Questionnaire for high-risk suppliers

Note:

- The form can be sent in various forms: e-mail, letter, etc.
- The form can be adapted to suit the supplier, as long as the content is complete (see Content below).
- The corporate procurement group can judge what is a credible assertion/statement as long as there is a paper trail.

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Company name:
Country of origin:

Name of representative :

Contact email address:

Phone number:

Human rights commitments:

- 1. Does your company have a written human rights policy?
 - o Yes No
 - o If so, please provide a copy or link to this policy.
- 2. Is your company committed to respecting international conventions against forced labor and child labor?
 - o Yes No
 - If so, please provide details of the measures implemented.
- 3. Does your company have a written policy against forced labor and child labor?
 - YesNo
 - If so, please provide a copy or link to this policy.
- 4. Does your company conduct internal audits to verify compliance with these policies?
 - YesNo
 - o If so, how often are they performed?



5. Do you have procedures for reporting and dealing with human rights violations

within your company?

	YesNoIf so, please describe these procedures.				
6.	Has your company ever been involved in forced or child labor?				
	 Yes No If so, please provide details of incidents and corrective measures taken. 				
7.	Does your company work with organizations or initiatives to improve working conditions and respect human rights?				
	Yes NoIf so, please name these organizations or initiatives.				
8.	. Has your company been audited by third parties for compliance with labor and human rights standards?				
	 Yes No If yes, please provide details of the last audit carried out and the results obtained. 				
9.	 Are you willing to undergo an external audit by us to verify compliance with our forced labor and child labor requirements? 				
	o Yes No				
Cor	nmitments and Declarations :				
	ase declare that all the information provided in this questionnaire is accurate and nplete.				
I declare that all the information provided is accurate and complete.					
Nar	Name and signature of authorized representative Date				



Appendix C Initial approach to establishing the basis for our assessments

1.8.1 Define supplier risk categories

1. Evaluation criteria:

- o Country of origin
- Type of production
- o Strict legislation against forced labor and child labor
- History of human and labor rights violations
- International rankings on workers' rights (e.g. Corruption Perceptions Index, ILO reports)
- o NOTE: Local laws and regulations must also be taken into account.

2. Updated risk categories :

• The procurement group will revise the criteria from time to time as new reports and data become available.

3. Supplier categorization:

o Canada: Low risk

United States: Low risk

Continental Europe: Low risk
 Eastern Europe: Medium risk
 Latin America: Medium risk
 Middle East: High risk

Asia: High riskAfrica: High risk

Maibec has carried out a more elaborate assessment for all medium- and high-risk suppliers. There are 3 suppliers out of 670 active suppliers who requested a more elaborate evaluation in 2024. An active supplier is one with whom we have had purchases/receipts in a given period.

Categorization	Number of active suppliers in 2023-2024	Number of inactive suppliers	
Low risk	670	2937	
Medium risk	2	1	
High risk	1	14	

1.8.2 Make a more detailed assessment of suppliers at greater risk

1. Identifying high-risk suppliers:



 Select suppliers in medium and high risk categories for further evaluation.

2. Evaluation and declaration form:

- o Use the form in Appendix B
 - Human rights commitments
 - Internal policies against forced labor and child labor
 - Internal control and audit measures
 - History of violations and corrective measures
- Send the form to identified suppliers each year.

3. Analysis of responses:

- Evaluate responses using a standardized analysis grid.
- Classify suppliers according to their compliance with current standards.

1.8.3 Review and establish action plans to reduce risks in the supply chain

- Determine whether the supplier is acceptable or not
- Establish additional actions that may be required for suppliers with unsatisfactory responses or high risks:
 - Audit, visit, attestation, etc.
- o Work with suppliers to remedy identified non-conformities.
- o Present an annual report to the Executive Committee

In 2025, Maibec will focus on evaluating these at-risk suppliers and on action plans to remedy the situations identified,