

Annual Report Prepared Pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act

INTRODUCTION

This report (the “Report”) has been prepared pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and outlines the actions Moulure Alexandria Moulding, Inc. (“Moulure”, “we”, “our” or “us”) has taken to prevent and reduce the risk of forced labour or child labour occurring in our business. This Report covers the financial year ending December 31, 2023. We do not tolerate child labour, forced labour or any other form of slavery and we expect that our suppliers share our commitment to ethical and responsible business practices and support our values.

OUR STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

Moulure is wholly owned and controlled indirectly by Specialty Building Products, Inc. (“SBP”), a Delaware corporation headquartered at 2160 Satellite Blvd., Suite 450, Duluth, GA 30097, U.S.A. SBP, through its operating subsidiaries including Moulure, is a distributor of specialty building products in the United States and Canada.

Moulure is a manufacturer and distributor of moulding and millwork products used in the residential construction industry. Moulure is incorporated under the laws of Ontario and is headquartered at 20352 Power Dam Road, Alexandria, Ontario K0C 1A0, Canada. Moulure operates from its manufacturing and distribution facility located in Ontario, Canada, and its distribution facility in Alberta, Canada. Our products are primarily used in the residential housing market, primarily in the new construction and repair and remodel markets. We distribute and sell our products to customers primarily in the United States and Canada. As of December 31, 2023, we employed 460 people. Additional information, including this Report, is available on our website at <https://www.alexmo.com>.

Our supply chain involves the sourcing of materials, primarily wood and wood composite products, as well as packaging supplies, machinery, equipment and other products needed as part of the production and distribution of our moulding and millwork products. Our materials are primarily sourced from suppliers located in Canada and the United States, with a small number located in other regions such as Asia and South America. Packaging, equipment and other products used in the production and distribution of our products is primarily sourced from Canada. Several of our key suppliers of wood products have implemented sustainable forestry practices and maintain forestry management certifications, such as the Forest Stewardship Council® (FSC®). FSC certificate holders must demonstrate conformance to the FSC Core Labor Requirements, which cover the abolition of child labor, elimination of all forms of forced or compulsory labor, elimination of discrimination with respect to employment and occupation, upholding freedom of association, and the effective recognition of the right to collective bargaining.

OUR POLICIES AND DUE DILIGENCE PROCESSES

Operating our business with integrity is one of our core values, and we expect all of our employees and associates to act in an ethical and honest manner and comply with all applicable laws. We maintain a

Child and Forced Labour Policy that strictly prohibits the use of any forced labour or exploitative working conditions in our operations. In addition, we expect our business partners, including our suppliers, to adhere to the ethical principles that we follow and comply with all applicable laws in the jurisdictions where they operate. As evidenced by our Supplier Code of Conduct described below, we strive to work with current and prospective suppliers to promote our ethical standards and to combat forced and child labour. We are working with our suppliers to communicate a clear understanding and appreciation of our values, ethical standards and provisions of the Supplier Code of Conduct. We also conduct periodic supplier assessments and reviews to verify the ethical business practices that we expect from our suppliers. These reviews and assessments include in-person visits and inspections of supplier facilities. We also support our suppliers' efforts to meet the standards set forth in our Supplier Code of Conduct through dialogue and cooperation.

To formalize the principles described above, we have developed formal policies and procedures, which include:

1. Supplier Code of Conduct

Our Supplier Code of Conduct is designed to promote our basic expectations of our suppliers regarding the conduct of their business in an ethical manner and in compliance with applicable laws, including in relation to forced and child labour. The Supplier Code of Conduct specifically addresses issues of forced labour and child labour, as well as the following items: compliance with applicable laws, anti-discrimination, environmental compliance, worker health and safety, data privacy, anti-bribery, illegal trade, conflict minerals, product quality, and reporting violations of the Supplier Code of Conduct. We expect all of our suppliers to comply with the Supplier Code of Conduct.

2. Code of Business Conduct and Ethics

As one of our core values, we believe you should always do the right thing, even when it is hard, and we have adopted our Code of Conduct & Ethics ("Ethics Code") as an embodiment of this core value. The Ethics Code is intended to guide all our officers, employees, directors and suppliers in maintaining a safe and respectful workplace, legal and regulatory compliance, equal opportunity, fair and ethical business practices free of corruption and bribery, environmental responsibility, confidentiality, and integrity in our financial controls and reporting. All employees are expected to know and understand the policies and guidelines in the Ethics Code. Employees review and acknowledge the Ethics Code when they join our organization and take periodic online refresher training.

3. Whistleblower Hotline

We have established a whistleblowing process, which includes an anonymous whistleblower hotline to encourage and facilitate reporting of various forms of misconduct, including concerns related to violation of applicable labour laws, workplace harassment, and worker safety. We expect employees and our suppliers to raise ethical concerns and to report potential Ethics Code violations promptly, completely, and honestly. Depending on the question or concern, employees are encouraged to speak first with their immediate supervisor or manager. Additional options to report issues, concerns or apparent misconduct include our 24-hour ethics hotline or our online ethics reporting platform, where the reporting person can choose to report anonymously.

We strive to foster and maintain transparent and collaborative relationships with our suppliers and communicate and promote our expectations around ethical business practices and compliance with law. We intend to further analyze forced and child labour risks in our supply chains in 2024 and beyond.

RISKS OF FORCED LABOUR AND CHILD LABOUR IN OUR BUSINESS AND SUPPLY CHAINS

We operate our facilities exclusively in Canada. Our supply chain includes mainly suppliers of materials, such as wood and wood composite products. Our suppliers are primarily located in Canada and the United States, and these suppliers of materials primarily source materials from the United States and Canada. Based on published country data on the prevalence of forced labour and child labour (such as the Global Slavery Index) both Canada and the United States have a low inherent risk of forced labour and child labour. Moreover, based on this data, the regions in South America and Asia where we have a small number of materials suppliers do not have a high risk for forced labour and child labour. Accordingly, based on the regions where we have physical operations and where our suppliers are primarily located, we believe most of our products in our direct supply chain should be considered low-risk for forced labour and child labour.

MEASURES TAKEN TO REMEDIATE FORCED OR CHILD LABOUR

We have not identified any confirmed instances of forced or child labour. Accordingly, no remediation measures have been taken.

MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT RESULT FROM ANY MEASURES TAKEN TO ELIMINATE THE USE OF FORCED OR CHILD LABOUR IN OUR ACTIVITIES OR SUPPLY CHAINS

We have not identified any confirmed instances of forced or child labour. Accordingly, no measures have been taken by us to remediate loss of income that result from measures taken to eliminate the use of forced or child labour in our activities or supply chains.

EMPLOYEE TRAINING

In 2023, we required employee training on our Ethics Code. The training was developed internally and covers several topics related to compliance with applicable laws and related to ethical business practices. During this training, we also communicated the avenues available to report any concerns or known violations of the Ethics Code, which would include violations of child and forced labour laws. This training included a review of our anonymous whistleblower reporting tool. The training was delivered to our salaried employees and periodic refresher training on the Ethics Code will be required in the future.

MEASURING OUR EFFECTIVENESS

At this time, we have not taken action to assess the effectiveness that forced labour and child labour are not being used in our business and supply chains.

BOARD APPROVAL AND ATTESTATION

This Report has been approved pursuant to the Act by our Board of Directors.

In my capacity as a Director of Moulure Alexandria Moulding, Inc., 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 this Report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Cynthia Seguin

Director

May 13, 2024