



**2025 Report on Compliance with
the *Fighting Against Forced Labour and Child Labour
in Supply Chains Act***

**2025 REPORT BY
JELD-WEN of Canada, Ltd.**

INTRODUCTION

This report is provided by JELD-WEN of Canada, Ltd. for the calendar year 1 January to 31 December 2025 pursuant to its obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). This report is intended to be consistent with JELD-WEN’s other public disclosures and policies relating to human rights and supply chain transparency. Where the Company reports under other jurisdictions’ modern slavery or supply chain transparency regimes, it seeks to align disclosures to avoid material inconsistencies while reflecting jurisdiction’s specific requirements.

ACTIVITIES, STRUCTURE AND SUPPLY CHAINS

JELD-WEN of Canada, Ltd. (JELD-WEN) is a leading manufacturer of interior and exterior doors and windows serving the new construction, repair, and remodeling sectors of the residential and commercial markets throughout Canada.

JELD-WEN is a subsidiary of JELD-WEN Holding, Inc., a publicly traded (NYSE) corporation, headquartered in Charlotte, North Carolina, USA. JELD-WEN has 1165 employees, is headquartered at 5750 Explorer Dr #402, Mississauga, ON L4H 0A9, Canada and operates manufacturing facilities in New Brunswick, Ontario, Manitoba, and Québec. JELD-WEN is an entity under subsection 2(b) of the Act.

JELD-WEN’s products are sold through multiple distribution channels, including direct sales to major builders, retail home centers and traditional window and door distributors. JELD-WEN sources its products and raw materials from group owned manufacturing sites in Canada, the United States, and Europe. JELD-WEN also sources products and components from third parties in Canada, the United States, Europe, and Southeast Asia.

POLICIES, CODES, STANDARDS & EXPECTATIONS & DUE DILIGENCE PROCESSES IN RELATION TO FORCED & CHILD LABOUR

JELD-WEN’s first corporate value is to conduct its business ethically, which includes a commitment to supply chain transparency and compliance with all applicable laws and regulations, including the Act.

The following JELD-WEN group policies relate to forced labour and child labour:

JELD-WEN’s Code of Business Conduct and Ethics (Code): [\[LINK-English\]](#) [\[LINK-French CAN\]](#)

JELD-WEN’s Code is the central document that outlines the Company’s overarching commitment to values and ethical approach. The Code is also the foundation of the Company’s central policies and procedures.

JELD-WEN’s Supplier Code of Conduct (Supplier Code): [\[LINK\]](#)

In 2025, JELD-WEN revised its Supplier Code of Conduct to further strengthen expectations and controls across its global supply chain. The revised Supplier Code enhances provisions related to

the prevention of underage and juvenile labour, compliance with applicable labour and employment laws, workplace health and safety, and a zero-tolerance approach to involuntary labour, human trafficking, harassment, abuse, and discrimination. The updated Supplier Code also reinforces requirements related to incident identification and reporting, responsible materials sourcing (including conflict materials and wood sourcing), and ethical business conduct, including expectations concerning the use of artificial intelligence, insider trading, trade controls and sanctions compliance, intellectual property and data security, conflicts of interest, competition and antitrust laws, gifts and entertainment, and anti-bribery and corruption. Suppliers are required to acknowledge and comply with the updated Supplier Code of Conduct as a condition of doing business with JELD-WEN, and compliance with these enhanced standards is integrated into JELD-WEN's supplier onboarding, monitoring, and engagement processes.

JELD-WEN's Supply Chain Transparency Disclosure: [\[LINK\]](#)

The group's Supply Chain Transparency Disclosure sets out JELD-WEN's commitment to an ethical supply chain and the Company's approach to ethical sourcing and preventing human trafficking, child labour and modern slavery.

JELD-WEN's Human Rights Policy Statement: [\[LINK\]](#)

The Human Rights Policy Statement sets forth JELD-WEN's commitment to respecting human rights in all aspects of its business.

DUE DILIGENCE

JELD-WEN has established and maintains a risk-based due diligence framework intended to identify, assess, mitigate, and address the risk of forced labour and child labour within its supply chain. This framework is designed to be proportionate to risk, informed by internal and external inputs, and continuously improved over time.

As part of its supplier oversight, JELD-WEN requires third-party vendors, through contractual provisions, to comply with applicable laws and regulations relating to labour standards, human rights, human trafficking, forced labour, and child labour. Suppliers are also required to acknowledge and adhere to JELD-WEN's Supplier Code of Conduct, which sets out expectations relating to labour practices, ethical conduct, and respect for human rights.

JELD-WEN utilizes a third-party enterprise risk management and due diligence platform, RiskRate (NAVEX, Inc.), to support supplier onboarding and ongoing monitoring activities. This platform is used to screen suppliers against global risk intelligence sources, including sanctions and watch lists, politically exposed persons lists, and adverse media, in order to identify potential risks related to compliance, human rights, and ethical conduct within the supply chain.

In addition, JELD-WEN's global sourcing and procurement function conducts ongoing supplier engagement as part of its due diligence activities. This includes a quarterly cadence of communications with selected suppliers to request information and documentation relevant to compliance with applicable laws, regulations, and JELD-WEN policies. Supplier responses are tracked through JELD-WEN's procurement systems and reviewed in coordination with the Global Compliance function. Where appropriate, sourcing and procurement personnel also engage

directly with suppliers through meetings and site visits to reinforce expectations, better understand supplier operations, and identify potential areas of risk.

JELD-WEN's forced labour and child labour due diligence operates as an end-to-end process that includes:

- (1) risk identification through third-party screening tools and internal sources of information;
- (2) risk assessment through enterprise-level and supply chain-specific risk reviews, including consideration of geographic, sector, and operational factors;
- (3) risk mitigation through supplier onboarding controls, contractual commitments, Supplier Code of Conduct requirements, targeted supplier engagement, and, where appropriate, site visits;
- (4) escalation and investigation through established ethics reporting channels and Compliance-led review processes; and
- (5) remediation and corrective action, up to and including disengagement from the supplier relationship where warranted.

Oversight of this due diligence framework is coordinated between Global Compliance and Global Sourcing and Procurement, with matters escalated to senior leadership as appropriate. JELD-WEN continues to enhance its supply chain due diligence and risk oversight. Planned improvements include expanding monitoring beyond tier-one suppliers where practicable, applying third-party risk screening across additional supplier tiers, implementing structured supplier onboarding assessments to evaluate labour and human rights risks at the outset of the relationship, strengthening contractual provisions related to ethical conduct, and requiring periodic supplier recertification to the Supplier Code of Conduct. These measures are intended to improve transparency, strengthen risk visibility in upstream supply chains, and support a proportionate, risk-based approach to supplier engagement and oversight.

PARTS OF THE BUSINESS & SUPPLY CHAINS THAT CARRY A RISK TO FORCED & CHILD LABOUR BEING USED & THE STEPS TAKEN TO ASSESS & MANAGE THAT RISK.

JELD-WEN assesses forced and child labour risk using a risk-based methodology that considers: (a) geographic risk (e.g., country and regional indicators); (b) sector/material risk (e.g., commodities and industries associated with elevated labour risk); (c) supplier risk signals (e.g., adverse media, watchlists/sanctions screening results, and supplier disclosures); and (d) supply-chain depth and reliance (e.g., criticality and volume of spend). Risk levels are reviewed at least annually and refreshed as new risk information becomes available through continuous monitoring and supplier engagement.

JELD-WEN managers at the group level meet annually to assess supply chain risks, including the risks of forced and child labour. Risks related to forced and child labour in JELD-WEN's North American operations are considered low risk because of the Company's, and its vendors', compliance with applicable employment and labor regulations. JELD-WEN has categorized risks of forced and child labour as medium with its vendors in Southeast Asia, based on the global risk index for that region and individual countries.

To manage and mitigate the identified risks, JELD-WEN has implemented the policies and due

diligence processes referenced above. The quarterly communications with vendors mentioned above also include questions specific to methods adopted to ensure forced and child labour is not a significant risk in the supply chain. Specifically, the Company utilizes the RiskRate platform, a whistleblower hotline, training, and vendor site visits to manage the risks.

MEASURES TAKEN TO REMEDIATE ANY FORCED LABOUR OR CHILD LABOUR

JELD-WEN has not identified any instances of forced labour or child labour within its operations or supply chains during the 2025 reporting period; accordingly, no remediation was required. Notwithstanding the absence of identified cases, JELD-WEN is committed to promptly addressing any substantiated instances should they arise, in accordance with applicable laws, regulations, and company policies.

Where credible indicators of forced labour or child labour are identified, JELD-WEN applies a risk-based response that may include immediate escalation to Global Compliance, engagement with the supplier to obtain relevant facts and documentation, implementation of corrective action plans with defined timelines, temporary suspension of new orders where appropriate, referral to competent authorities when legally required or appropriate, and termination of the supplier relationship where remediation is not feasible or the supplier fails to cooperate. Consistent with JELD-WEN's contractual commitments and Supply Chain Transparency Disclosure, non-compliance with labour and human rights requirements may result in disengagement from the business relationship.

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

In circumstances where remediation measures could reasonably contribute to loss of income for vulnerable individuals or families, JELD-WEN seeks to take these impacts into consideration. Where appropriate, and in collaboration with suppliers and relevant stakeholders, mitigation measures may include supporting responsible recruitment practices, facilitating transition to lawful employment, or implementing other context-appropriate actions aimed at reducing harm while addressing the identified risk.

TRAINING JELD-WEN EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

JELD-WEN provides ongoing training to employees to promote awareness of forced labour, child labour, human trafficking, and related supply chain risks. During the reporting period, all employees globally were required to complete Code of Conduct training, which includes content addressing supply chain transparency, human trafficking, and forced labour. Upon completion, employees are required to attest to their understanding of the Code, confirm that they are not aware of violations, and acknowledge their obligation to report concerns through available reporting channels, including JELD-WEN's anonymous ethics hotline.

In addition to company-wide training, JELD-WEN provides targeted training to employees with heightened exposure to supply chain risk. In December 2024, JELD-WEN delivered a live training

session titled *Modern Slavery in the Supply Chain* to global procurement, sourcing, and supply chain personnel. This training covered JELD-WEN's policies and expectations regarding forced labour and child labour, applicable legal and ethical obligations, indicators of labour risks in operations and vendor relationships, and escalation and reporting requirements.

Training completion is tracked through JELD-WEN's learning management processes, including monitoring completion rates by employee group and conducting follow-up reminders for non-completion, to support consistent participation and awareness across the organization.

ASSESSING THE EFFECTIVENESS OF ENSURING THAT FORCED LABOUR AND CHILD LABOUR ARE NOT IN OUR BUSINESS AND SUPPLY CHAINS.

JELD-WEN assesses the effectiveness of its controls through a combination of qualitative and quantitative indicators, such as: (1) completion rates for relevant employee training; (2) number of supplier attestations and response rates to quarterly supplier outreach; (3) volume and disposition of ethics reports related to supply chain labour risks; (4) trends in supplier risk ratings and adverse media alerts identified through third-part monitoring; and (5) outcomes of supplier reviews and site visits, including corrective actions tracked to closure. These indicators are reviewed periodically by Compliance and Procurement leadership to identify gaps and drive continuous improvement.

BOARD ATTESTATION STATEMENT & APPROVAL

In accordance with the requirements of the Act, and in particular subsection 11(5) thereof, I attest that I have reviewed the information contained in this report for JELD-WEN. 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.

This report was approved pursuant to paragraph 11(4)(a) of the Act, by the directors of the corporation.

I further attest that I have the authority to bind JELD-WEN of Canada, Ltd.



Robert Conway
Vice President and Director,
JELD-WEN of Canada, Ltd.

May 20th, 2026.
Date