

Bailey-Hunt Limited and its Subsidiaries

2024 Report – Fighting Against Forced Labour and Child Labour in Supply Chain Act

1. Introduction

This report (the “**Report**”) is the Forced Labour and Child Labour Report submitted pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“**Act**”) by Bailey-Hunt Limited (“**Bailey-Hunt**”) and certain of its subsidiaries listed below (collectively the “**Company**” or “**we**” or “**our**”). It covers the Company’s most recently completed financial year ending December 31, 2024 (“**Reporting Period**”). The following subsidiaries are reporting entities under the Act and are referred to as “Subsidiaries” or each as a “Reporting Entity” in this Report:

- Bailey Metal Products Limited (“**Products**”);
- Bailey Metal Processing Limited (“**Processing**”); and
- Agway Metals Inc. (“**Agway**”).

The Report outlines the steps that Bailey-Hunt and its Subsidiaries (the “**Bailey Group**”) have taken during the reporting period to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere and importing of goods into Canada produced outside of Canada.

This Report contains forward-looking information and should be read in conjunction with the cautionary statement on forward-looking statements contained in the public disclosure documents of the Compagnie de Saint-Gobain (“**Saint-Gobain**”).

2. Steps Taken in the Previous Financial Year to Prevent and Reduce Risks of Forced Labour and Child Labour

The Bailey Group believes ethical business practices are fundamental to long term sustainability. We strive to create a place where all agents working on behalf of Bailey-Hunt and the Subsidiaries uphold and respect human rights as reflected in the UN Universal Declaration of Human Rights and the Canadian Charter of Rights and Freedoms. We uphold and support stringent ethical standards and principled business conduct throughout all our operations and respect the dignity and human rights of individuals globally.

3. Our Structure, Activities and Supply Chains

3.1 Structure

Bailey-Hunt, based in Concord, Ontario, Canada, is incorporated under the *Business Corporations Act* (Ontario). Bailey-Hunt operates as a holding entity encompassing the Subsidiaries: Products, Processing, and Agway, which are all incorporated under the *Business Corporations Act* (Ontario) with principal offices in Concord, Ontario, Canada.

On January 1, 2025, Products amalgamated with Bailey West, Inc., one of its affiliates.

During the Reporting Period, Saint-Gobain, through its building materials subsidiary CertainTeed Canada, Inc., acquired the Bailey Group (the “**Acquisition**”). The integration process of the Acquisition is on-going and is anticipated to be completed within the next reporting cycle. The Bailey Group will thereafter comply with all of Saint-Gobain policies to prevent and reduce the risk that forced labour or child labour be present at any step within their supply chain.

3.2 Activities

Bailey-Hunt Limited

Bailey-Hunt operates as a holding entity and does not engage in the production, sale, distribution, or importation of goods and is not involved in direct operational or commercial activities. Bailey-Hunt controls and manages the Subsidiaries. The governance structure of Bailey-Hunt is designed to ensure proper oversight, strategic decision-making, and effective management of the company and its subsidiaries' business interests. Our governance structure comprises executive and non-executive roles and a board of three (3) directors. Bailey-Hunt has no employees.

Bailey Metal Products Limited

Since 1950, Products has served Canada's commercial and residential construction markets, combining hard work, leadership and unrivaled customer service. Products provides exceptional products and services to contractors and builders through partnerships with specialty dealers, distributors, and retailers. We are a manufacturing company specializing in roll-forming operations. Products employs 393 people across Canada, servicing the construction industry.

Employees of Products serve customers across Canada by providing services that meets the exacting standards of its customers. Through facilities housing state of the art equipment, along with its highly skilled operators and technicians, Products creates innovative high-quality products that meet or exceed all applicable industry codes and standards. The inkjet stamp of approval that its products exhibit guarantees the quality and code compliancy that Products is known for in the industry. Products continues to lead the industry with a proactive approach to research, development and manufacturing.

In addition, Products is a manufacturer of light gauge steel products which operates a manufacturing facility in Surrey, British Columbia. This particular facility is equipped with advanced technology and operated by a team of skilled professionals, enabling it to produce a wide range of high-quality steel products and steel slitting services that meet the dynamic needs of its customers.

Products has a head office in Concord, Ontario, with additional locations in Princeton (Ontario), Dorval, Quebec, Calgary and Edmonton, Alberta.

Bailey Metal Processing Limited

Processing is a dedicated service centre specializing in providing slitting services to Products and other customers. Known for its slitting services, Processing has built a reputation on quality service and value. Processing has a strategically located steel processing facility in Burlington, Ontario, to better serve its customers across Canada. It is a leading provider of flat rolled carbon steel with customers from a broad range of industries serving a variety of markets. Processing has 66 employees.

Processing strives to build upon its record of consistent quality by providing precise tolerances, excellent edge condition, tight winding, camber control and minimum scrap. Processing continues to demonstrate its commitment to quality through its rigorous process of Quality Management Systems (QMS) implementations and compliance.

Agway Metals Inc.

For over 40 years, Agway's diverse solutions comprise a range of product lines focused on residential, agricultural, industrial, commercial, and institutional market applications. Agway strives to have its steel solutions meet or exceed the specific demands and expectations of its customers.

It is the expertise, diligence and responsiveness of Agway's people that allow it to deliver steel solutions that work. From cladding, roofing and decking, to specialized accessories and custom-formed shapes for innovative construction projects, Agway's industry leadership and product lines are complemented by the specialized knowledge, commitment and responsiveness of our people, who make it so that customers find Agway easier to do business with.

Agway has plants in Brampton (ON), Exeter (ON), Oakville (ON) and Drummondville (QC) and employs 230 people in Canada.

3.3 Supply Chains

During the Reporting Period, Bailey-Hunt and its Subsidiaries have mapped their tier 1 suppliers and categorized its supplier spend. This is an essential step towards enhancing the transparency and robustness of our supply chains.

During the Reporting Period, the mapping of Bailey-Hunt and its Subsidiaries' tier 1 suppliers was as follows:

Bailey-Hunt Limited's Supply Chain

Bailey-Hunt is the parent company and operates as a holding company. Our primary role is to control and manage Products, Processing, and Agway. Currently, Bailey-Hunt is not directly involved in the day-to-day operations or commercial activities such as procurement of goods and services. We only provide strategic oversight to our subsidiaries and do not partake in the purchasing or sourcing of materials, products, or services that are typically associated with the operational aspects of a business. This allows Bailey-Hunt to focus on broader business strategies, and long-term planning without engaging in the direct or indirect management of supply chains or the intricacies of procurement processes.

Bailey Metal Products Limited's Supply Chain

For the Reporting Year, Products had a diverse portfolio of steel producers, processors, distributors and traders, totaling approximately 17 distinct entities. Among these, 10 suppliers are located in Canada, and 3 in the United States. This sourcing strategy helps us achieve a reliable supply of steel for our manufacturing processes. In addition, we had approximately 249 non-steel suppliers in the Reporting Year. Of these suppliers, 235 operate in Canada and 9 in the United States, with the remaining suppliers located elsewhere in the world including Spain, the United Kingdom, and India. A majority of these suppliers are categorized into procurement categories including, freight, repair and maintenance, third party resale, factory expenses, and consulting services.

Bailey Metal Processing Limited's Supply Chain

Processing maintains a diverse network of direct suppliers, to assist in securing a steady supply of materials for the production of the organization's high-quality steel products. Its supplier agreements are crucial for meeting the demands of our customers and maintaining our

competitive edge in the market. For the Reporting Year, Processing had approximately 15 steel producers, processors, distributors and traders. Among these, 11 suppliers were located in Canada and 4 in the United States. The steel it procures is centered on quality and reliability, sourced from a variety of regions including North America, Europe, Asia, and the Middle East. In addition, Processing has approximately 32 non-steel suppliers for the Reporting Year. Of these 32 non-steel suppliers, 31 are located in Canada and one in the United States. The majority of these non-steel suppliers provides maintenance and construction services, followed by packaging, health & safety products, and production consumables.

Agway Metals Inc.'s Supply Chain

Agway has identified 383 suppliers used during the Reporting Period. These suppliers offer a vast array of goods and services that are integral to Agway's success. Agway's suppliers provide it with steel, transportation services, marketing services, equipment rental and repairs, facility maintenance, health and safety services, industrial equipment, office supplies, packaging materials, plant supplies, truck repair and maintenance services and utilities. Of Agway's 383 suppliers, 358 are located and operate in Canada and 25 are located and operate in the United States.

Among the 383 suppliers it engages with, 10 are steel producers, processors, distributors and traders that are known for their high-quality steel products. These suppliers provide it with steel coils, flat steel sheets, and various other steel products. Agway's steel suppliers are strategically located in Canada, allowing it to have reliable and consistent access to premium materials. The steel is mainly sourced from Canada and the United States. Together, Agway's steel suppliers enable it to deliver excellence to its customers.

4. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

The Bailey Group is committed to conducting business with the highest ethical standards and integrity. Following the Acquisition, the Bailey Group is currently undertaking a comprehensive review of existing policies related to child labour and forced labour. Our goal is to enhance and harmonize our policies and due diligence procedures with Saint-Gobain to proactively identify, mitigate, and address any instances of forced labour or child labour that may arise within our operations or throughout our supply chains. To date, we have implemented several policies and processes that reinforce the Bailey Group's stance on maintaining high ethical standards. These include our Code of Conduct Policies, Supplier Compliance Agreement, Human Rights Policy (Agway), Ethics Policy (Agway), and an Internal Investigation Policy, which serve as the foundation of our responsible business practices.

4.1 Code of Conduct

Bailey-Hunt shares a Code of Business Conduct with Products, and Processing that is the cornerstone of Bailey-Hunt's commitment to a professional work environment of unwavering quality and integrity. All employees are expected to comply with the letter of the laws and refuse to take part in all forms of improper business practice. Full compliance with the Code of Business Conduct for Bailey-Hunt, Products, and Processing is expected from all of their respective employees.

In line with our values, Agway, one of our Subsidiaries, is equally committed to fostering a safe and healthy work environment where respect, fairness, and trust are present through its own Code

of Conduct. Agway's Code of Conduct highlights the shared responsibility of all employees to enhance the workplace, behave ethically, and avoid any conduct that is hazardous, criminal, or detrimental to the collective morale and success of the organization. Agway's policies are clear and apply to every employee, regardless of their employment status, as it strives to uphold the standards that will lead to job satisfaction and mutual trust within its diverse and dynamic team. Agway employees are responsible for adhering to the Agway Code of Conduct.

Should there be any breaches of any of the above described Codes, our employees must immediately report those breaches which can result in a confidential investigation. Failure to report may result in termination. We ask our employees to seek guidance from their managers on any potential violations to maintain the high standards set in our Codes.

Further, as part of the Acquisition, all employees of Products, Processing and Agway have received training on Saint-Gobain's Principles of Code of Conduct.

4.2 Supplier Compliance Agreement

The Bailey Group has a longstanding commitment to integrity, honesty, and respect, and we seek to uphold these values by working to have our supply chains free from forced and child labour. Once the integration process of the Acquisition has been completed, the Bailey Group will have adopted the same supplier charter agreement as Saint-Gobain (the "**Agreement**") to further reinforce our dedication to ethical practices. This Agreement sets out our expectation that our suppliers will be fully compliant with any reporting obligations under the Act. By signing this Agreement, suppliers declare that their workforce is employed willingly, that they do not engage in forced labour and/or child labour, and that the goods sold to us are not sourced from entities violating these standards. We expect our suppliers to maintain transparency and immediately inform us via email of any non-compliance.

This Agreement underscores the Bailey Group's commitment to sustainable and ethical sourcing, aligning with international standards to combat forced and child labour.

4.3 Human Rights Policy (Agway)

Agway has established a Human Rights Policy which outlines its commitment to maintaining non-discriminatory employment practices, creating an open, inclusive, and healthy work environment free from discrimination and harassment. This policy is applicable to all employees of Agway and expects employees to report any policy violations promptly. Agway offers both informal and formal channels for reporting grievances and conducts confidential investigations, with corrective actions including dismissal. Agway is also focused on safeguarding the privacy and ensuring the fair treatment of all involved parties.

4.4 Ethics Policy (Agway)

Agway's Ethics Policy is dedicated to open and ethical business conduct, fostering a workplace of trust, accountability, and integrity, and protecting all its employees, vendors, customers, and the company itself from illegal or damaging actions. This policy applies to all employees, outlines expected roles in maintaining ethics, defines unethical behavior, and details corrective actions for

violations to the policy. Management and executives maintain honest and open discussions, and report conflicts of interest or ethical violations, while all employees contribute to an ethical environment and report any conflicts or violations, with protection against retaliation. Any violation of this policy will lead to corrective action, which may include termination or legal proceedings.

4.5 Internal Investigation Policy

Products, Processing, and Agway have implemented an internal investigation policy to address non-routine issues such as misconduct and complaints made by internal and external parties swiftly and impartially. Qualified individuals, such as members of the Compliance Team of Saint-Gobain North America, conduct investigations. Under this policy, we expect individuals aware of such issues to report them to management, who then coordinate with Human Resources to oversee the investigation, including gathering evidence and conducting the appropriate analysis. Maintaining confidentiality throughout the process is crucial. Upon completion of the independent and impartial investigation, findings are shared confidentially, and corrective measures are carried out to minimize the risk of similar incidents. Human Resources keeps logs of all incidents, reviewed biennially to enhance the policy continuously.

As the Bailey Group, we recognize the importance of safeguarding human rights and the need for a mechanism that empowers employees and suppliers to report unsuitable business practices without fear of retaliation.

5. Forced Labour and Child Labour Risks

During the Reporting Period, the Bailey Group has continued the process of mapping its supply chain and operational activities. To date, neither Bailey-Hunt nor any of the Subsidiaries has conducted an assessment to identify areas within their respective business and supply chains that may have a potential risk of forced and child labour and hence, has not taken any steps to assess and manage those risks.

6. Measures Taken to Remediate Forced Labour or Child Labour

Bailey-Hunt, Products, Processing, and Agway have not identified any instances of forced labour or child labour in their respective activities or supply chains and therefore have not undergone steps to remediate any harms of child labour or forced labour during the Reporting Period.

7. Remediating the Loss of Income to the Most Vulnerable Families

Bailey-Hunt, Products, Processing, and Agway acknowledge that efforts to prevent and reduce the risks of forced labour and child labour can have the unintended consequences of contributing to a loss of income for the family members of employees of their suppliers should the contractual relationship with the Bailey Group be terminated for reason of forced labour or child labour in their employer's business operations and supply chains. Currently, neither Bailey-Hunt nor any of the Subsidiaries are aware of any instances to date where their respective efforts to mitigate the risk of forced labour and child labour in their activities and supply chains may have contributed to a loss of income for such vulnerable families.

8. Training Provided to Employees on Forced Labour and Child Labour

The entities within the Bailey Group acknowledge the importance of empowering their staff with the learnings required to support their procurement personnel to understand, identify and

competently manage the risks of forced labour and child labour throughout their operations and supply chains. However, as of the current Reporting Period, neither Bailey-Hunt nor any of the Subsidiaries have implemented a training program for their employees specifically addressing the risks of forced or child labour.

9. Assessing Our Effectiveness

The entities within the Bailey Group have yet to establish a framework for measuring the effectiveness of their respective forced labour and child labour risk mitigation efforts. They are committed to developing a methodology for effectively assessing and addressing forced labour and child labour risks in their operations and supply chains and aim to continually improve their ability to assess these risks over time.

10. Board of Directors Approval and Attestation Statement

This Report was Approved by the Board of Directors of each Reporting Entity, pursuant to section 11(4)(b)(i) 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 the report for the entities listed below. 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.

I make the above attestation in my capacity as a director of each of Bailey-Hunt Limited, Bailey Metal Products Limited, Bailey Metal Processing Limited, and Agway Metals Inc. and not in my personal capacity.

[SIGNATURE PAGE FOLLOWS]

Dated this 25th day of May, 2025

Bailey-Hunt Limited



Jean-Claude Lasserre, Director
I have the authority to bind Bailey-Hunt
Limited

Bailey Metal Products Limited



Jean-Claude Lasserre, Director
I have the authority to bind Bailey Metal
Products Limited

Bailey Metal Processing Limited



Jean-Claude Lasserre, Director
I have the authority to bind Bailey Metal
Processing Limited

Agway Metals Inc.



Jean-Claude Lasserre, Director
I have the authority to bind Agway Metals
Inc.