



## **Canada Bill S – 211 Report Filing**

This report is prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)* (the “Act”), by Golden Windows Limited (the “Company”), an Ontario corporation. Golden Windows Limited manufactures and sells windows and doors primarily to the residential building market in Ontario, Canada. Its head office and manufacturing facility are located in Kitchener, Ontario.

This report has been prepared for the calendar year ended December 31, 2023.

In this report, we detail the corporate governance, processes and policies that are in place to ensure that human rights (including forced labour and child labour) are complied with by Golden Windows Limited and the supply chains of Golden Windows Limited.

This is not a revised report or a joint report. Golden Windows Limited has no reporting obligations outside of Canada.

### **Our Vision**

Golden Windows is an integrated designer, manufacturer and distributor of quality windows and entry door systems.

We will be the supplier of choice for quality home builders and renovators in our chosen geographic markets.

We will be recognized as an employer who provides a satisfying and safe work environment for everyone to contribute to the success of the company and to share in the rewards of that success.

### **Our Supply Chain**

Golden Windows Limited is the manufacturer of the vast majority of products that it sells and distributes. The parts in our products are sourced from Canadian and US manufacturers and distributors. We also have suppliers to support our general operations.

Golden Windows Limited is committed to the safety and health of its employees and conducts its operation in compliance with all applicable laws and regulations. In addition to these laws, Golden Windows Limited is committed to paying its employees a living wage and became a member of the Ontario Living Wage Network in 2023. A requirement of being a member of the Ontario Living Wage Network is to ensure that subcontractors are also paid a living wage.

Like many other businesses the risks in our supply chain arise because of our limited visibility into our suppliers’ downstream supply chain. Golden Windows understands the critical importance of conducting risk assessment to identify potential vulnerabilities to forced labour, prison labour and child labour within our network of suppliers. We will institute monitoring mechanisms and employ technologies and methodologies to continually scrutinize and address any emerging risks.

### **How we work to ensure our supply chains are free of forced labour and child labour**

Golden Windows is committed to supporting responsible sourcing of its material from suppliers that share our values around human rights and ethics.

### **Our policies and due diligence processes**



Golden Windows is developing a **Supplier Code of Conduct** which will lay out the obligations of its suppliers. It will formalize Golden Windows expectation that our suppliers be good corporate citizens and comply with all applicable laws and regulations, including those governing the manufacture of our products, safety, child labour employment, labour and the environment. Suppliers are expected to be familiar with the business practices of their sub-suppliers and contractors and together operate within the guidelines of the **Supplier Code of Conduct**. This will ensure that our suppliers provide goods and services that comply with the Fighting against forced labour and child labour in supply chains act. Canadian suppliers that post on their website annually a report that meets the requirements of the Act will be considered to be in compliance with this policy.

We will develop a detailed and accurate report that will document our pursuit of compliance and ethical sourcing practices. This report will demonstrate our transparency and commitment to combatting labour exploitation across our supply chain.

#### **Remediation:**

Golden Windows Limited has not identified forced or child labour in our activities and supply chains and therefore remediation is considered not applicable. Golden Windows will act swiftly and decisively to rectify situations that breach ethical standards. We will collaborate with affected suppliers, provide support to impacted individuals as appropriate, and implement relevant corrective measures.

#### **Training**

Golden Windows Limited will train all affected employees on the requirements of this Act and all policies and procedures adopted by the Company to ensure that it remains in compliance with the Act.

#### **Monitoring and Continuous Improvement**

Leadership at Golden Windows Limited will continue to undertake periodic assessment of our business activities and supply chains to identify new and emerging threats related to forced labour and child labour. In addition, our policies and management systems are reviewed at least annually to assess the effectiveness of our existing strategies.

#### **Attestation**

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 entity or entities 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 above.

Paul Kreutner  
President  
May 27, 2024

I have the authority to bind Golden Windows Limited