

**Canadian Statement Against Forced Labor and Child Labor in Supply Chains**  
pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in  
Supply Chains Act and to amend the Customs Tariff,  
referred to as Canada’s “*Modern Slavery Act*” (the “**Act**”)  
for the year ending 2022-2023

## **1. INTRODUCTION**

This is a statement made by Pella Canadian Holdings, LLC and its wholly owned subsidiary Pella Windows & Doors of Ontario, Corp., in respect of the Act, as referenced above.

Pella Canadian Holdings, LLC is a limited liability company registered pursuant to Minnesota, United States laws. Pella Windows & Doors of Ontario, Corp. is a corporation incorporated pursuant to the laws of Canada.

## **2. REPORTING ENTITY**

This Report is being jointly filed on behalf of Pella Canadian Holdings, LLC and its wholly owned subsidiary Pella Windows & Doors of Ontario, Corp.

## **3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

Pella Windows & Doors of Ontario, Corp. (the “**Company**”) is in the retail sale of windows and doors. The Company is wholly owned by Pella Corporation, headquartered in Pella, Iowa in the United States.

Pella Corporation designs and manufactures windows and doors for both residential homes and commercial applications, and sells its products through various subsidiaries, including the Company. The products sold by the Company are exclusively manufactured by Pella Corporation. Accordingly, all procurement for the products sold by Company is done by its Pella Corporation, through its professional supply chain personnel. Pella Corporation expects its primary suppliers to have commitment to social responsibility, including adherence to internationally recognized child and forced labor laws. These values and expectations are stated in Pella Corporation’s Supplier Handbook. In Pella Corporation’s Purchase Order Terms and Conditions, it specifically states, “Seller expressly warrants that all Goods or services furnished under an Order/Purchase Order shall conform to all applicable Product Specifications, laws, regulations and standards, including child labor and other laws relating to human trafficking.”

Pella Corporation’s supply base primarily consists of North American direct material suppliers providing raw materials (glass, vinyl extrusions, lumber, hardware, aluminum) and components for expert assembly several of whom serve our competitors, as well. Pella Corporation manages its supply chain through its team of professionals who are involved with selecting suppliers and are responsible for overseeing relationships with the selected suppliers. In building long-term relationships with key suppliers, Pella Corporation will visit supplier locations, interact with management, review performance, and observe operations. Performance

is monitored and the results of this monitoring is communicated with key supply partners through a formal Supplier Performance Rating process.

#### **4. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOR AND CHILD LABOR**

The Company itself receives fully manufactured products from Pella Corporation and therefore looks to Pella Corporation's practices to assess and manage supply chain risk. Pella Corporation requires its supply chain partners to be bound to terms and conditions which warrants compliance with all laws including child labor and human trafficking. Pella maintains a policy on its [website](#) indicating its expectations and steps to mitigate forced and child labor in compliance with California law.

Pella Corporation expects its suppliers to have commitment to social responsibility. This would include sustainable environmental programs to benefit their community and society at large, adherence to internationally recognized [forced labor and] child labor laws, and practicing diversity and respect within the workplace. As stated above, these values and expectations are specifically stated in Pella Corporation's Supply Management Handbook. Pella Corporation's Purchase Order Terms and Conditions require that suppliers adhere to applicable laws, including those relating to [forced labor, child labor, and] human trafficking in any form. Pella Corporation requires its suppliers to warrant that materials comply with the laws regarding slavery and human trafficking.

Pella Corporation's stated policies in its Supplier Handbook, together with the Purchase Order Terms and Conditions clearly communicate to suppliers that Pella will not do business with them if they fail to adhere to such laws.

In accordance with its Supplier Manual, Pella Corporation expects its suppliers to have a commitment to social responsibility. This includes many of the values outlined above, including adherence to internationally recognized [forced labor and] child labor laws, leveraging individual and cultural diversity, and practicing respectful work environments.

Pella Corporation's Purchase Order Terms and Conditions give Pella Corporation the right to audit suppliers. Pella Corporation's Supply Chain Management personnel also make visits to various suppliers in order to have an awareness of their business practices. Forced labor and child labor matters are considered as part of these visits. Since 2020, Pella vets new suppliers which includes scrutiny with forced/child labor.

Pella Corporation further has an annual ethics certification for every employee, which includes the Supply Chain team, to affirm they are aware of the laws regulating their industry and work functions and that they are not aware of legal or regulatory violations.

In addition, Pella Corporation has a whistleblower policy in place. Employees are [required] to report any legal or regulatory violations, or violations of any Pella Corporation policy in accordance with this policy. For any team member who wishes to remain anonymous, Pella Corporation maintains a hotline for reporting compliance and ethics matters.

**5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOR AND CHILD LABOR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK**

The Company itself receives fully manufactured products from Pella Corporation and therefore looks to Pella Corporation's practices to assess and manage supply chain risk. Pella Corporation regularly reviews its supply chain to consider risks and compliance with both applicable laws and Pella Corporation's policies and standards. With the robust supply chain program in place, as outlined above, the Company does not believe it has material risks at this time.

**6. MEASURES TAKEN TO REMEDIATE FORCED LABOR AND CHILD LABOR**

Neither the Company nor Pella Corporation has identified any instances of forced labor or child labor in its supply chains. Accordingly, no steps to remediate forced or child labor have been undertaken.

**7. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOR AND CHILD LABOR**

Neither the Company nor Pella Corporation have taken steps to remediate forced or child labor in their supply chains. Accordingly, no steps to remediate loss of income based on elimination of forced or child labor have been undertaken.

**8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOR AND CHILD LABOR**

The Company is committed to adherence to all legal standards and expects its suppliers to have commitment to the laws and social responsibility. Pella Corporation's standards and values are incorporated into all training of employees and managers who have responsibility for supply chain management. Supply Chain personnel are trained annually on a host of legal topics and while forced labor and child labor are not specifically part of the current training, Pella Corporation's stance is embodied in its Supplier Handbook, website, and Purchase Orders.

**9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOR AND CHILD LABOR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS**

The Company's primary supplier, Pella Corporation holds itself to the standards it sets, along with the laws. To do so, Pella Corporation maintains an internal auditing department that implements Pella Corporation's Enterprise Risk Management and assessment, along with third-party/external partnerships for accountability and best practices. Accordingly, with all laws, regulations, policies, and governance, Pella Corporation holds itself accountable.

### 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. For clarity, I am providing this attestation in my capacity as a director and officer of Pella Canadian Holdings, LLC and its wholly owned subsidiary Pella Windows & Doors of Ontario, Corp., and not in my personal capacity.

- Full name: Daniel Wilcox
- Title: President, Pella Canadian Holdings, LLC and its wholly owned subsidiary Pella Windows & Doors of Ontario, Corp.

I have the authority to bind Pella Canadian Holdings, LLC and its wholly owned subsidiary Pella Windows & Doors of Ontario, Corp.

Signed: Daniel Wilcox Date: 5.28.24