

**Annual Report under the *Fighting Against Forced Labour in Supply Chains Act*
Harmon Facades ULC, 2023-24**

This report has been produced by Harmon Facades ULC (“**Harmon Canada**”) for the financial year ending March 2, 2024 (the “**Reporting Period**”). This report identifies and explains the procedures and policies adopted to prevent and reduce the risk of child labour and forced labour being present in any step of the production, importation, and sale of goods in Canada or elsewhere.

Harmon Canada is committed to ensuring that fundamental human rights are respected and that its business practices and operations are consistent with and in support of the UN Guiding Principles on Business and Human Rights. We value and strive to uphold the highest standards of integrity, ethical behaviour, transparency, safety, and corporate citizenship.

This report is the first to be produced by Harmon Canada pursuant to Canada’s newly adopted *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). Harmon Canada’s parent company, Apogee Enterprises, Inc., (“**Apogee**”) has also published a Human Rights statement which reiterates our commitment and attentiveness in respecting human rights internationally and excluding any forms of forced labour and child labour throughout our supply chain.

I. Structure, Activities and Supply Chains

Harmon Canada is registered in Vancouver, British Columbia and its principal place of business is in Brampton, Ontario. Harmon Canada is 100% owned by Architectural Services Holding Company, LLC (“**Architectural Services**”), which is itself 100% owned by Apogee Enterprises, Inc. (“**Apogee**”). Apogee is headquartered and principally located in Minneapolis, Minnesota, United States of America.

Harmon Canada manufactures unitized curtain walls, which are aluminum-framed engineered fenestration products. Our unitized curtain walls form the building envelope, or facade, for multi-story buildings. Our unitized curtain walls consist of an extruded aluminum frame, hardware, sealants and infill materials. Infill materials are most commonly glass but may also include other materials such as stone, tiles or photovoltaic panels.

Harmon Canada also provides preconstruction, engineering, design and installation services, whether directly or through our affiliated companies.

Apogee is a leading provider of architectural products and services for enclosed buildings, and high-performance glass and acrylic products used for preservation, energy conservation and enhanced viewing.

Harmon Canada purchases all of its inputs, including aluminum extrusions, glass, stone, sealants and hardware from Canada, the United States and Europe.

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II. Our Policies and Training on Countering, Reporting and Detecting Forced and Child Labour

Harmon Canada enforces and abides by Apogee’s Code of Business Ethics and Conduct, Supplier Code of Conduct (“**Supplier Code**”), Conflict Minerals Policy, and other policies that encourage ethical business practices and purchasing activities. This commitment is extended to our employees, managers and suppliers to ensure that Apogee embeds human rights considerations throughout its supply chain and decision-making processes.

A. Statement on Human Rights

Apogee’s Statement on Human Rights (“**Statement**”), which apply equally to its Canadian subsidiaries, holds that our approach to human rights is guided by internationally recognised standards and practices. Apogee has embedded its principled stance on the respect and protection of human rights in its values and Code of Business Ethics and Conduct.

The values expressed in Apogee’s Statement apply to all of its subsidiaries and their operations, regardless of geographic location. All business partners, including suppliers and other parties working on behalf of any Apogee business, are expected to observe the principles and values communicated in the Statement. Apogee is strictly opposed to and will not tolerate the use or inclusion of child labour, forced labour, slavery, human trafficking or other oppressive, illegal forms of labour in Apogee’s transactions and production processes, nor those of Apogee’s suppliers, partners or any party with whom Apogee conducts business.

B. Supplier Code of Conduct

Apogee’s Supplier Code expresses policies, values and expectations that align with Apogee’s Code of Business Ethics and Conduct, Conflict Minerals Policy and Human Rights Statement. Apogee’s Supplier Code applies to all suppliers (defined as any organisation that directly provides goods and services to Apogee) of Apogee and its subsidiaries, including Harmon Canada. The Supplier Code is periodically reviewed, modified and amended. Apogee’s Senior Manager of Procurement Analytics is responsible for the management and implementation of the Supplier Code and its accompanying policies.

The Supplier Code assures that suppliers conduct their business in compliance with all laws, rules and regulations, including those that prohibit unfair or illegal trade practices, bribery, corruption, unfair pricing and misrepresentation of products or services. The Supplier Code holds that all applicable international, federal, state, provincial and local legislation, laws, rules and regulations on human rights, conflict minerals, labour and the environment are equally and robustly respected by all suppliers. With respect to forced and child labour, the Supplier Code states:

...Apogee strictly prohibits and is opposed to the use of child labor, forced labor, slavery, or any other oppressive labor conditions, as well as any form of human trafficking. Apogee will not knowingly do business with any supplier which engages in these practices and reserves the right to take corrective actions, up to and including termination of the relationship.

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To ensure that the Supplier Code and its values are upheld by all suppliers, Apogee maintains the right to engage with suppliers to monitor their operations. In the case that instances of non-compliance with the Supplier Code are detected or discovered, Apogee may require a commitment by the supplier to implement a corrective action plan to return the supplier to compliance with the Supplier Code. If non-adherence to the Supplier Code continues, Apogee may, at its discretion, terminate its relationship (including that of its subsidiaries) with the supplier that does not share Apogee's values with regard to human rights and prevention and exclusion of forced and child labour.

C. Duty to Report

Employees and personnel of Apogee have a duty to report any suspected or actual breach of any aspect of the Supplier Code, policies, the law or regulations. Further, this duty to report extends to the conduct by Apogee suppliers and other third parties working with Apogee in any capacity. Reports of violations can be submitted on a confidential basis to avoid any forms of repercussions or retaliations.

Reports of suspected or confirmed instances of child and forced labour can be submitted in a variety of methods and forms:

- Online: www.apog.ethicspoint.com (enter the organization name of "Apogee") (worldwide)
- By Telephone: Apogee Code of Conduct Hotline—800.441.6164 (toll-free in the U.S. and Canada)
- In Writing: Apogee Enterprises, Inc., 4400 West 78th Street, Suite 520, Minneapolis, Minnesota 55435 USA Attention: General Counsel
- By Email: ApogeeLegal@apog.com; ApogeeCompliance@apog.com

If employees, personnel and suppliers of Apogee have any questions regarding the Supplier Code, including potential violations, we recommend that they contact the Apogee Procurement Office at procurement@apog.com.

D. Consequences of Violations of the Supplier Code, the Law or Regulations

In the case that a violation of the Supplier Code or other policies, laws or regulations that are not superseded by international or local law are found to have occurred, including the practice of child or forced labour, Apogee will require that corrective measures be taken to ensure that operations and business activities are brought in line with Apogee's values and policies. In the case that this is rejected or insufficiently implemented, Apogee may, at its discretion, terminate the relationship.

E. Training

When employees are hired by Harmon Canada, they are required to take training on Apogee's Code of Business Ethics and Conduct. These training sessions cover numerous areas such as

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equal opportunity, discrimination, harassment and ethical decision making, which may extend to instances of alleged or suspected child and forced labour. Employees of Harmon Canada are also required to complete annual training online via Workday in October or November of every year.

Further, the Supplier Code includes a systemic signoff for evidence of training completion to ensure that employees, managers and personnel are aware of Apogee’s policies, values and resources concerning the prevention and exclusion of human rights abuses in the supply chain, including child and forced labour. Apogee also highly encourages its suppliers to implement an analogous training session to educate their leadership and employees on Apogee’s expectations that suppliers comply, where possible, with the established expectations and principles in the Supplier Code and accompanying policies.

III. Parts of Our Supply Chain that Carry Risk of Forced or Child Labour

For the purpose of preparing this report, we examined our supply chain to identify aspects of the supply chain that may carry a heightened risk of forced labour. To do so, we have relied on various tools, including:

- a) the “Responsible Sourcing Tool”, which is the result of a collaboration between Verité, an independent civil society organization, and the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons;¹
- b) the US Bureau of International Labour Affairs “Better Trade Tool”;²
- c) the Uyghur Forced Labour Prevention Act (“UFLPA”) Entity List;³
- d) the Withhold Release Orders and Findings List published by the US Customs and Border Protection Agency;⁴ and
- e) the “KnowTheChain” organisation website and reports.⁵

The most significant inputs purchased in our most recently completed financial year, by dollar value, were aluminum extrusions, glass, and sealants/coatings. These products and our suppliers of these products are addressed below.

A. Metals

¹ Responsible Sourcing Tool, “Identify Risks in Your company’s Global Supply Chains”, available online: <https://www.responsiblesourcingtool.org/>.

² Bureau of International Labor Affairs, “Better Trade Tool”. The Better Trade Tool integrates existing reporting developed by the Bureau of International Labor Affairs (ILAB) with U.S. import trade data to serve as a resource in learning about labour exploitation risks in global supply chains. Available online: <https://www.dol.gov/agencies/ilab/better-trade-tool>.

³ U.S. Department of Homeland Security, “Uyghur Forced Labor Prevention Act (UFLPA) Entity List”, available online: <https://www.dhs.gov/uflpa-entity-list>.

⁴ U.S. Customs and Border Protection, “Withhold Release Orders and Findings List”. The Withhold Release Orders and Findings are issued by the Commissioner and are published in the Federal Register. Available online: <https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>.

⁵ KnowTheChain, “Company List”, available online: <https://knowthechain.org/company-list/>.

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Harmon Canada sources aluminum extrusions for its unitized curtain wall product from suppliers in Canada and the United States.

According to the Responsible Sourcing Tool, the metals sector possesses the following risk factors:

- Hazardous/undesirable work;
- vulnerable, easily replaced, and/or low-skilled workforce;
- migrant workforce;
- presence of labour contractors, recruiters, agents or other middlemen in labour supply chain; and
- long, complex, and/or non-transparent supply chains.

There is a “documented risk” of forced and/or child labour in a number of countries according to the Responsible Sourcing Tool.

Harmon Canada sources aluminum extrusions for its unitized curtain wall product from suppliers in Canada and the United States. These countries are noted as key producing countries for the “extractives, mining and metal” grouping by the Responsible Sourcing Tool, with the note that “due diligence is advised”. The Responsible Sourcing Tool does not show a documented risk of forced and/or child labour in either country.

For the purpose of preparing this report, Harmon Canada has screened our suppliers of aluminum extrusions located in Canada and the United States using multiple reputable lists and tools. None of our suppliers of aluminum extrusions have been flagged in any published lists or databases documenting supply chain risks.

B. Glass

Harmon Canada imports glass from the United States and some European countries, and purchases glass from Canadian suppliers.

The Responsible Sourcing Tool does not identify risks of child and forced labour worldwide for the glass industry. While the Responsible Sourcing Tool does document potential hazards and presence of forced and child labour in the construction sector, this is specifically with regard to labour on construction sites and thus does not encompass raw materials such as glass.

The US Bureau of International Labour Affairs’ Better Trade Tool has found heightened risk of child labour for glass imports originating from Bangladesh.

Considering that Harmon imports glass products from the United States and Europe, according to the US Bureau of International Labour Affairs, no heightened risks of child or forced labour have been documented.

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Harmon Canada has screened our suppliers of glass located in Canada, Europe and the United States using multiple reputable lists and tools. None of our suppliers of glass have been flagged in any published lists or third-party databases documenting supply chain risks.

C. Sealants, Coatings

Harmon purchases sealants and coatings from suppliers in Canada and the United States. As it stands, none of the aforementioned resources or databases indicates that our supplier nor the sealant industry as a whole possesses a noteworthy, elevated danger of child or forced labour being present in its productions processes or its supply chains. We will continue to monitor these resources in the case that our suppliers, the sealant industry or an analogous product is highlighted as having incorporated child or forced labour in its operations.

In addition to the inputs discussed above, we have screened all of our suppliers using the lists and tools cited in this report. None of those suppliers have been flagged by these lists or tools.

Based on these facts and investigations, Harmon Canada assesses that our supply chain does not contain an elevated risk of forced and child labour.

Nevertheless, Harmon Canada has adopted numerous policies to verify on a continuing basis that child and forced labour is not present in our operations and transactions or that of our suppliers.

IV. Due Diligence

Harmon Canada has embedded responsible business conduct into its policies and management systems, including our Supplier Code.

In addition, for the purpose of preparing this report, we screened our suppliers using multiple reputable lists and tools. Our screening process is described in the section above.

V. Any Measures Taken to Remediate Any Forced/Child Labour

Harmon Canada has not identified any instances of forced or child labour in our supply chain and so no remediation measures have been required.

VI. Assessing Effectiveness

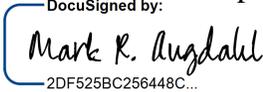
Harmon Canada did not take actions in its most recently completed financial year to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains.

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VII. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, 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.

Signed by:  DocuSigned by:
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Signature

Name: Mark R. Augdahl

Position: Director

Company Name: Harmon Facades ULC

Date 5/31/2024

I have the authority to bind Harmon Facades ULC