



FORCED LABOUR AND CHILD

LABOUR

REPORT 2025



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INTRODUCTION

Starline Windows Ltd. is a leading designer and manufacturer of windows and doors for residential projects across Canada and the United States. The company is committed to conducting its business in an ethical, responsible, and transparent manner, with a strong emphasis on respecting human rights and complying with all applicable labor and employment laws.

This report outlines the measures taken by Starline Windows Ltd. during the period of January 1, 2025, to December 31, 2025, to prevent and reduce the risk of forced labour and child labour within its operations and supply chains. The report has been prepared in accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Starline Windows recognizes the importance of maintaining responsible supply chain practices and ensuring that all individuals involved in the production and delivery of its products are treated with dignity, fairness, and respect. The company remains committed to identifying, addressing, and mitigating potential risks related to forced labour and child labour through responsible sourcing, internal policies, and ongoing monitoring of its supply chain relationships.

Through continued diligence and oversight, Starline Windows seeks to promote ethical business practices and contribute to the protection of human rights across its operations and supply networks.

STRUCTURE, BUSINESS, AND SUPPLY CHAIN

Starline Windows Ltd. is a Canadian company specializing in the design, manufacture, and installation of architectural aluminum window systems as well as residential vinyl windows and doors. With over 50 years of experience in the industry, the company serves residential, projects across Canada and the United States.

Starline Windows operates as a vertically integrated organization, managing multiple stages of its operations including product design, manufacturing, distribution, and installation. The company conducts its operations through facilities located in Canada, where skilled employees and advanced manufacturing technologies support the production and delivery of its window and door systems.

The company's supply chain includes a network of domestic and international suppliers that provide raw materials, components, and specialized products required for manufacturing. These materials include, but are not limited to, aluminum, vinyl components, glass units, hardware, and related manufacturing inputs. Starline Windows also works with logistics and transportation partners to support the distribution of its products to customers in Canada and the United States.

Starline Windows is committed to maintaining transparency and ethical responsibility throughout its operations and supply chains. The company expects its suppliers and business partners to comply with applicable labor laws and internationally recognized human rights standards, including prohibitions against forced labour and child labour. Starline Windows maintains a zero-tolerance approach to such practices and seeks to work with suppliers who share its commitment to responsible and ethical business conduct.

Through responsible sourcing practices and ongoing engagement with suppliers and partners, Starline Windows aims to ensure that its supply chains operate in a manner consistent with the company's values of integrity, accountability, and respect for human rights.

POLICIES AND DUE DILIGENCE PROCESSES

Policy on Human Rights and Modern Slavery

Starline Windows Ltd. remains committed to maintaining the highest standards of ethical conduct and corporate responsibility. The company's policies reflect its core values and are aligned with internationally recognized human rights frameworks, including the International Labour Organization (ILO) Conventions, applicable national human rights laws, and the United Nations Guiding Principles on Business and Human Rights.

Starline Windows maintains a strict zero-tolerance policy toward modern slavery in all its forms, including forced labour and child labour. During the 2025 reporting period (January 1 to December 31, 2025), the company continued to apply its existing policies and due diligence procedures designed to prevent, detect, and address risks related to forced labour and child labour within its operations and supply chains.

No material changes were made to these policies during the 2025 reporting period.

Starline Windows remains committed to respecting and protecting the human rights of all workers, including nationals, migrants, and temporary employees.

Our Commitments

Adherence to National and International Legal Standards

Starline Windows Ltd. complies with all applicable national and international laws, regulations, and standards relating to labour rights and human rights. The company continues to enforce its policy prohibiting the hiring of individuals under the age of 18 in hazardous roles, reinforcing its commitment to preventing child labour.

Code of Conduct

Respect for human rights is a fundamental principle of Starline Windows' operations. The company's Code of Conduct guides employees, suppliers, and business partners in applying ethical and human rights considerations to business decisions and operational practices.

Supply Chain Due Diligence

Starline Windows continues to apply its supply chain due diligence processes to assess suppliers and business partners. These processes include evaluating potential suppliers to

ensure they are legally operating entities and that they align with the company's expectations regarding ethical labour practices and compliance with applicable laws.

Transparency and Reporting

Starline Windows maintains internal channels that allow employees and stakeholders to report suspected violations related to forced labour or child labour. These reporting mechanisms are intended to promote transparency and ensure that concerns can be raised without fear of retaliation.

Continuous Improvement

Starline Windows remains committed to continuously reviewing and improving its human rights policies and due diligence processes. The company monitors evolving industry standards and best practices to strengthen its approach to responsible supply chain management.

These policies apply to all employees, suppliers, contractors, customers, and business partners associated with Starline Windows Ltd.

Through the continued implementation of these policies during the 2025 reporting period, Starline Windows reaffirms its commitment to maintaining ethical business practices and protecting human rights throughout its operations and supply chains.

RISK ASSESSMENT

Starline Windows Ltd. recognizes that certain risks related to forced labour and child labour may exist within global supply chains, particularly in industries involved in the sourcing of raw materials such as glass, aluminum, and other manufacturing components.

These risks may arise in regions where labour standards, regulatory oversight, or enforcement mechanisms may be less robust. As a result, Starline Windows acknowledges the importance of maintaining ongoing vigilance and proactive management of its supply chain relationships.

During the 2025 reporting period, the company continued to monitor potential risks associated with its supply chain. No specific incidents of forced labour or child labour were identified within Starline Windows' operations or known supply chain relationships during this period.

To address potential risks, Starline Windows continues to implement the following measures:

1. Supplier Due Diligence

Starline Windows conducts screening of suppliers and business partners to help ensure alignment with ethical labour practices and applicable labour laws.

2. Supplier Code of Conduct

The company maintains expectations for suppliers regarding ethical labour practices, including the prohibition of forced labour and child labour.

3. Contractual Expectations

Where appropriate, contractual agreements with suppliers include provisions requiring compliance with applicable labour laws and responsible labour practices.

4. Training and Awareness

Employees involved in procurement and supplier management are encouraged to remain aware of potential indicators of forced labour or child labour within supply chains.

5. Supply Chain Transparency

Starline Windows continues to maintain visibility into its supply chain relationships and seeks to work with reputable suppliers that meet its standards for responsible business conduct.

6. Reporting Mechanisms

Employees and stakeholders have access to reporting channels that allow them to raise concerns related to unethical or unlawful labour practices without fear of retaliation.

7. Stakeholder Engagement

Starline Windows remains attentive to developments in labour rights practices and regulatory expectations relevant to its operations and supply chain activities.

8. Continuous Monitoring and Improvement

The company periodically reviews its policies and processes to ensure they remain aligned with evolving regulatory requirements and best practices in responsible supply chain management.

Starline Windows remains committed to identifying and addressing risks related to forced labour and child labour and will continue to enhance its practices to support ethical and responsible supply chains.

ACTIONS TO REDUCE AND ADDRESS THE RISK

During the 2025 reporting period (January 1, 2025, to December 31, 2025), Starline Windows Ltd. did not receive any reports or identify any cases of forced labour or child labour within its operations or known supply chains. As a result, no remediation measures were required during this reporting period.

Starline Windows continues to maintain its commitment to prevention, monitoring, and ethical compliance across its operations and supply chain relationships. Throughout 2025, the company continued to apply its existing due diligence practices aimed at identifying and mitigating potential risks related to forced labour and child labour. These efforts include ongoing engagement with suppliers and partners to promote compliance with applicable labour laws and responsible business practices.

Should any instances of forced labour or child labour be identified in the future, Starline Windows is prepared to take appropriate actions, which may include:

- Taking prompt corrective action in accordance with established remediation procedures.
- Engaging with affected individuals and relevant stakeholders to ensure appropriate support and resolution.
- Reviewing and strengthening internal policies and preventive measures to reduce the likelihood of future occurrences.

Starline Windows remains committed to maintaining vigilance in its supply chain oversight and to upholding its zero-tolerance approach to forced labour and child labour. The company

continues to work toward ensuring that its operations and supply chains operate in a responsible, ethical, and sustainable manner.

TRAINING AND AWARENESS

Starline Windows Ltd. recognizes the important role that training and awareness play in promoting ethical labour practices and preventing forced labour and child labour within its operations and supply chains.

During the 2025 reporting period (January 1, 2025, to December 31, 2025), Starline Windows continued to promote awareness among employees regarding the importance of ethical conduct, respect for human rights, and compliance with applicable labour standards. These efforts support the company's broader commitment to maintaining responsible business practices and ensuring that employees understand the expectations related to ethical labour practices.

Through ongoing communication and reinforcement of company policies, Starline Windows seeks to ensure that employees remain informed and attentive to potential risks related to forced labour and child labour. These awareness efforts help promote a workplace culture that supports transparency, accountability, and respect for human rights.

Starline Windows remains committed to continuing and strengthening these awareness efforts in future reporting periods as part of its ongoing approach to responsible supply chain management.

EFFECTIVENES

Starline Windows Ltd. remains committed to preventing and addressing the risks of forced labour and child labour within its operations and supply chains. The company continues to maintain policies, procedures, and oversight mechanisms intended to support ethical labour practices and responsible supply chain management.

During the 2025 reporting period (January 1, 2025, to December 31, 2025), Starline Windows continued to apply its due diligence processes and internal policies designed to reduce the risk of forced labour and child labour. These measures include maintaining supplier expectations regarding ethical labour practices, promoting employee awareness of responsible business conduct, and providing reporting channels for potential concerns.

Starline Windows evaluates the effectiveness of its efforts through ongoing review of its policies, supplier relationships, and internal practices. No reports or confirmed incidents of forced labour or child labour were identified within the company's operations or known supply chains during the 2025 reporting period.

The company recognizes that addressing risks related to forced labour and child labour requires continuous monitoring and improvement. Moving forward, Starline Windows will continue to strengthen its policies, supplier engagement practices, and internal awareness efforts to further support responsible supply chain management.

APPROVAL AND ATTESTATION

This report has been prepared by Starline Windows Ltd. in accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act for the reporting period January 1, 2025, to December 31, 2025.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information contained in this report is true, accurate, and complete in all material respects for the purposes of the Act.

Lesley Noland

Chief Operating Officer

Starline Windows Ltd.



Date: March 15th, 2026