



UFP INDUSTRIES

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CANADA FORCED AND CHILD LABOUR REPORT

This report (the “Report”) is filed on behalf of the following entities, all of which are subsidiaries of UFP Industries, Inc., a Michigan USA corporation, for purposes of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023* (the “Canada Act”):

- Deckorators, Inc., a Michigan USA corporation (“Deckorators”);
- Eovations, LLC, a Michigan USA limited liability company (“Eovations”);
- UFP Ventures II, Inc., a Michigan USA corporation (“UFP Ventures”); and
- idX Corporation, a Delaware USA corporation (“idX”).

The foregoing entities are referred to in this Report collectively as “UFP,” “we,” “us,” “our,” or the “reporting entities.” References in this Report to the “UFP group” refer to the broader corporate group of entities that is comprised of UFP Industries, Inc. and its subsidiaries, including the reporting entities. Dollar figures included in this Report are U.S. dollars.

This Report describes the steps and actions taken by UFP for the fiscal period of January 1, 2024 to December 31, 2024 (the “reporting period”).¹

Our Structure and Activities

The UFP group is a global building products company headquartered in Grand Rapids, Michigan USA, with various affiliates located throughout North America, Europe, Asia, and Australia. The UFP group designs, manufactures, and supply products made from wood, composites, and other materials to three markets – retail, packaging, and construction.

We do not own, lease, or operate forest land for timber production, grow or harvest trees for lumber production, or own or operate lumber mills. We rely on our suppliers and their respective supply chains for those products and services.

The broader UFP group manages and financially reports its operations through three business segments – UFP Retail Solutions, UFP Packaging, and UFP Construction. These segments align with the end markets the UFP group serves. The UFP group manages the operations of its individual locations primarily through a market-centered reporting structure under which each location is included in a business unit, and each business unit is included in one of the three operating segments (Retail Solutions, Packaging, or Construction).

¹ The UFP group also made disclosures pursuant to the California Transparency in Supply Chains Act of 2010.

Deckorators, Eovations, and UFP Ventures, together with Deckorators' wholly-owned subsidiary Ultra Aluminum Manufacturing, Inc. ("Ultra Aluminum"), comprise the "Deckorators" business unit in the UFP group's Retail Solutions segment. This business unit manufactures and sells wood plastic composite and the patented Surestone™ mineral based composite decking and related decking accessories, including aluminum railing systems, balusters, post caps, and similar products, as well as cusidxtomized aluminum fencing. The business unit's plants are located in the U.S. (Alabama, Iowa, Michigan, and Wisconsin).

idX and its wholly owned subsidiary comprise the Commercial business unit in the UFP group's Construction segment. This business unit designs, manufactures, and installs highly customized interior fixtures, casework, and architectural millwork used in a variety of retail and commercial structures. The business unit's plants are located in Canada (Ontario Province), China (Jiangsu Province), the U.K. (London area), and the U.S. (California, North Carolina, Texas, and Virginia).

Additional information about the UFP group including the reporting entities is available as follows:

- For UFP Industries, Inc. and its subsidiaries including the reporting entities, see www.ufpi.com;
- for Deckorators, Eovations, and UFP Ventures, see www.deckorators.com; and
- for idX, see www.idxcorporation.com.

Our Supply Chains

We work with many suppliers to provide goods and services to support our business activities. These suppliers provide both inputs to goods and services we offer to customers as well as goods and services needed to support our general operations. We primarily source the materials used in our North America operations, including Canada, from U.S.-based suppliers.

The UFP group's purchasing team manages and purchases wood fiber for each of the reporting entities and the other members of the UFP group. The three main end markets for softwood lumber in North America – retail, packaging, and construction – align with the UFP group's three business segments.

The UFP group uses numerous primary producers for all varieties of wood used in its operations. Southern yellow pine is sourced primarily from mills ranging from Texas to the Carolinas; spruce-pine-fir from both Eastern and Western Canada; hemlock, douglas fir, and cedar from the Pacific Northwest; inland species of pine, plantation grown radiata, and southern yellow pines from South America; and various softwoods from Europe.

The suppliers of Deckorators, Eovations, and UFP Ventures, which together with Ultra Aluminum comprise the Deckorators business unit, are located in Canada, China, Mexico, Thailand, the U.S., and Vietnam. The business unit's principal inputs and related source countries are as follows:

Goods	Countries
Metals	Canada, China, Mexico, U.S., Vietnam
Packaging/MRO	China, Mexico, Thailand, U.S.
Post Caps/Accessories/Wood	Canada, China, Mexico, Thailand, U.S.
Resin/Plastics	Canada, China, Mexico, U.S.
Wood	U.S.

The suppliers of the idX business unit (Commercial) are located in Canada, China, Poland, the U.K., and the U.S. The business unit's principal inputs and related source countries are as follows:

Goods	Countries
Metals	Canada, China, Poland, U.S.
Wood	Canada, China, Poland, U.S.
Plexiglass	Canada, China, U.K, U.S.
Glass	Canada, China, U.K., U.S.

Approximately 85% of the Deckorators business unit's suppliers are long-term, stable relationships with which it does repeat business. The remaining 15% is generally comprised of ad hoc suppliers engaged to source new products or to take advantage of competitive pricing. For all but one of the idX business unit's plants, the relative percentages of long-term vs. ad hoc suppliers are approximately 90%-10%, with one plant's relative percentages being approximately 75%-25%.

Risks of Forced or Child Labour in Our Supply Chains

We are committed to conducting our business activities with the highest standards of business ethics and in accordance with all applicable laws, including laws regarding the use of forced or child labour and employee health and safety. We have developed and implemented a variety of internal policies, standards, and procedures applicable to our employees to ensure we put that commitment into practice. Further, we expect our suppliers to comply with applicable laws and to maintain safe, respectful working environments.

Similar to other global manufacturers with many suppliers, risks in our supply chain arise primarily because of our limited visibility to the operations of our suppliers as well as to our suppliers' respective supply chains. Manufacturing also may present a higher risk of use of forced or child labour relative to other industries. Container freight and international shipping lines also may present risks of use of forced or child labour. Despite those factors, because of the types of goods we source, our emphasis on engaging known and reputable suppliers, the heavy concentration of our suppliers in North America and other developed countries that have strict laws regarding labour standards, including prohibitions against forced labour, child labour, slavery, and human trafficking, and robust enforcement practices, we consider the risk of use of forced or child labour in our supply chains to be low.

Actions Taken to Fight Forced or Child Labour in Our Supply Chains

We are committed to ensuring that we have appropriate measures in place to limit the risk of forced or child labour in our operations and to avoid engaging suppliers who use such practices in their operations. We have undertaken several proactive steps to support this commitment that were in place during the reporting period, such as the following:

- adopting and implementing appropriate policies, standards, and procedures applicable to our employees as well as suppliers;
- providing regular training to our employees, including management, on these policies, standards, and procedures;
- requiring our suppliers to comply with our Supplier Code of Conduct (discussed in more detail below), which among other things states our expectation that suppliers adhere to applicable labour and other laws, and making the Code publicly available on our website;
- undertaking due diligence with respect to prospective suppliers, which may include site visits, information requests and questionnaires, vendor scorecards, and other diligence efforts;
- including in supply agreements wherever possible affirmative covenants of the applicable suppliers to comply with labour laws including those regarding forced labour, child labour, slavery, and human trafficking;
- engaging known and reputable suppliers as much as reasonably practicable; and
- setting up mechanisms such as whistleblower hotlines to allow employees and third parties to safely report concerns regarding forced labour, child labour, slavery, human trafficking, and other violations of law.

As noted above, UFP maintains several, regularly reviewed policies, standards, and procedures supporting our efforts to ensure safe, healthy, and respectful working environments in our operations and supply chains, including environments that respect human rights and reduce the risk of use of forced and child labour. These include the following:

- *Supplier Code of Conduct* – this policy applies to all UFP suppliers globally and states our business practice standards. Our suppliers have access to our whistleblower hotline to report actual or suspected wrongdoing and they are expected to cooperate with any related investigations. We may decline or discontinue engagement with any supplier who does not comply with this policy. UFP expects our suppliers to:
 - comply with and treat employees fairly and in accordance with all applicable laws, including, but not limited to, laws relating to business operations, employment rights, the environment, and employee health and safety;
 - abstain from forced labour of any kind and ensure that child labour is not used;
 - ensure equal opportunity and non-discriminatory practices in hiring and employment decisions;
 - adhere to fair working conditions; and
 - maintain safe, secure, and healthy work environments for their employees.

- *Code of Business Conduct & Ethics* – this policy requires all of our directors, officers, and employees to respect and obey the laws of the cities, states, and countries in which we operate as well as all of our internal policies. All directors, officers, and employees are required to commit to this policy. Violations of this policy are subject to disciplinary action, which may include a corrective action plan, termination, and/or delivering evidence to appropriate governmental authorities for prosecution.
- *Employment of Minors Policy* – this policy prohibits the employment of minors (individuals under the age of 18) specifically for our manufacturing and wood preservation facilities because of the hazardous nature of that type of work. The policy permits individuals aged 16 and 17 to be employed in clerical or maintenance positions in these facilities under certain restrictions set forth in the policy and in accordance with applicable laws.
- *Health and Safety Policy* – this policy describes our commitment to provide safe, sustainable, and healthy work environments for our employees and to comply with applicable environmental, health, and safety laws. As set forth in the policy, we expect our suppliers and others who do business with us to do the same.
- *Conflict Minerals Policy* – this policy describes the principles we follow to ensure responsible sourcing of conflict minerals (gold, tantalum, tin, and tungsten) and compliance with UFP Industries, Inc.’s conflict minerals reporting obligations under U.S. securities laws as a publicly traded company. As described in this policy and in the UFP group’s annual “Form SD” filed with the U.S. Securities and Exchange Commission, we undertake reasonable due diligence of our suppliers and their supply chains to identify the source of any conflict minerals and to ensure they are “conflict free” pursuant to regulations issued by U.S. Securities and Exchange Commission. We expect our suppliers to cooperate in these due diligence efforts or risk review of future business.
- *Hotline Reporting Policy* – this policy reflects the value we place on open communication in the workplace regarding our business practices. It also states our intent to protect our employees from unlawful retaliation and discrimination for properly disclosing illegal or unethical conduct. We rely on our employees as well as third parties, such as employees or contractors of our suppliers and other third parties, to prevent, detect, and report forced or child labour in our supply chains. These individuals are encouraged to report concerns about or suspicion of forced or child labour in our supply chains as soon as practicable. We maintain hotlines that anyone can use to make these reports. Information about these hotlines is made available internally to our employees and publicly on UFP Industries, Inc.’s website. The reports are treated in a confidential and anonymous manner to the extent permitted by law.

These policies are made available to our employees and posted at our facilities and/or on UFP’s intranet. With the exception of the Employment of Minors policy, which is available only internally to UFP employees, the foregoing policies are publicly available on UFP Industries, Inc.’s website, at <https://www.ufpinvestor.com/governance#governance-documents>.

As noted above, we require our suppliers to comply with all applicable labour laws, whether local, state, federal, or international, including laws regarding forced labour, child labour, slavery, and human trafficking.

We conduct audits of our suppliers, which may be either announced or unannounced, typically at least once per year. From time to time, we may use a third-party auditor for our supply chains. The scope or matters addressed by an audit varies depending on the reporting entity conducting the audit as well as the supplier. The audits do not routinely address forced labour, child labour, slavery, and human trafficking, although they may include other human resource matters such as employee health and safety. Some of our customers conduct their own audits of our vendors using third-party auditors, and the scope of such audits are in the discretion of such customers.

How We Addressed Incidents of Forced or Child Labour in our Supply Chains

During the reporting period, we did not receive a report or identify instances of the use of forced or child labour in our supply chains that would necessitate remediation measures. Consequently, we did not undertake any measures to remediate the loss of income to the most vulnerable families.

If forced or child labour is identified within our supply chains, UFP is committed to taking immediate and effective measures to remediate the situation.

Training

UFP provides compliance training to management and other salaried employees and to some hourly administrative employees during the first year of employment. Retraining typically occurs within one to three years, depending on the specific subject matter. The training addresses a variety of legal, regulatory, and human resource matters, such as workplace ethics and compliance, preventing discrimination and harassment, employee relations, health and safety, and anti-corruption. The training does not specifically address prevention of forced or child labour.

Hourly production workers receive compliance training as required by law, which may include topics such as sexual harassment, discrimination, or workplace violence. Those employees provided with access to the UFP group's intranet also receive cybersecurity training.

In addition to training, employees are made aware of and have access to our corporate policies, including those described above. Employees generally are required to acknowledge receipt of employee handbooks that include relevant compliance and other corporate policies. We also post copies of various policies at workplaces as required by law.

How We Assess the Effectiveness of Our Efforts to Fight Forced or Child Labour in Our Supply Chains

We have not taken actions designed to specifically assess our effectiveness in preventing and reducing risks of forced and child labour in our business activities and supply chains. However, we are committed to preventing forced and child labour from taking place in our business and supply chains and will consider frameworks and processes to assess the effectiveness of our policies, procedures, and practices to carry out this commitment and determine any potential improvements.

Approval and Attestation

This Report was approved by the governing body of each reporting entity covered by this Report pursuant to section 11(4)(b)(i) of the Canada Act.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)*, and in particular section 11 thereof, I, in the capacity of Corporate Secretary and Director of Corporate Compliance, attest that I have reviewed the information contained in this Report on behalf of the governing body of each reporting 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 within this Report.

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R. Paul Guerre
Corporate Secretary and Director of Corporate Compliance
UFP Industries, Inc.

Date: May 23, 2025

* I have the authority to bind Deckorators, Inc., Eovations, LLC, UFP Ventures II, Inc., and idX Corporation.