



## 2023 Forced Labour and Child Labour Report

---

### 1. ABOUT THIS REPORT

This report relates to the financial year ending December 31, 2023. It is published by MAAX Bath Inc. in compliance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "**Act**"), on behalf of itself and Les Produits Neptune Inc., a wholly-owned subsidiary of the Company (hereinafter collectively referred to as the "**Company**", "**MAAX**", "**we**" or "**our**").

This report provides an overview of the steps taken by the Company within its last financial year to prevent and reduce the risk of forced labour or child labour in its activities and supply chain.

### 2. PREVENTING AND REDUCING RISKS OF FORCED LABOUR AND CHILD LABOUR

MAAX is committed to ensuring that its operations and supply chains are free from any form of child or forced labour, and that we respect the human rights and dignity of all workers. We believe our employees are our most valuable and powerful assets. We must provide and continually nurture an environment of growth, opportunity, responsibility, conviction and determination to succeed. Accordingly, MAAX strives to pursue its activities in accordance with the highest standards of honesty and ethical conduct in all aspects of its business affairs.

During the last financial year, we have taken steps to prevent and reduce risks that forced labour or child labour be used at any step of our production of goods in Canada or of goods imported into Canada by us, including the following:

- We mapped our activities and supply chain, audited suppliers and contracted an external assessment of risks of forced labour and child labour at some of our suppliers.
- We engaged with supply chain partners on the issue of addressing human rights violations and requiring that our suppliers have in place policies and procedures with respect to such issues.
- We have been gathering information on worker recruitment and maintaining internal controls to ensure that all workers at MAAX are recruited voluntarily and treated fairly.
- We have been conducting our operations in accordance with a Code of Ethical Practices for our employees (the "**Employee Code**") and a Supplier Code of Conduct (the "**Supplier Code**") which both provide for protection of whistleblowers against retaliation. The Supplier Code further provides for the prohibition of forced labour, as well as due diligence and child protection policies and processes.

Details of the above actions, among others, are set forth in this report.

### 3. ABOUT US & OUR SUPPLY CHAIN

#### About us

Founded in 1969, MAAX is a North American leader in the bath ware industry with three main product lines: bathtubs, shower solutions and shower doors.

A wholly-owned subsidiary of American Bath Group, LLC ("**ABG**"), MAAX has eight production facilities in North America, of which four are located in Canada, and employs nearly 1,400 people, including 630 in Québec. The Company also has two R&D centres in Sainte-Marie-de-Beauce and in Lachine, as well as a dedicated team based in the United States.

New product development is fundamental to MAAX's strategy. We are constantly testing new products and technologies by exploring emerging market trends and have a team dedicated to innovation-related activities.

MAAX has invested extensively in modernizing equipment and strengthening manufacturing, quality, environment, Health, and Safety (EH&S) processes at its manufacturing facilities.

## Supply Chain

The majority of our suppliers are based in Canada and US, making up around 68,5% of our purchases. We also work with suppliers in other countries like China (28,4% of our purchases) Mexico (3%), Italy (less than 1%), Sweden (less than 1%) and Turkey (less than 1%).

While we do not have full visibility into all of our suppliers' sourcing practices, we know that our Canadian and US suppliers source have sourcing or production operations in countries such as China, Turkey and Mexico.

To manage risks, we focus on cultivating strong and enduring relationships with reputable suppliers in the industry and we expect all our direct and indirect suppliers to uphold the highest human rights standards.

## 4. POLICIES AND DUE DILIGENCE PROCESSES

In our ongoing efforts to enhance diligence and mitigate risks associated with forced labour and child labour, the Company is actively incorporating responsible business practices in its processes, both in its direct activities and in its dealings with suppliers.

### Recruitment Process

MAAX maintains a recruitment process that adheres to federal and provincial legal requirements in the Province of Québec. We employ proactive measures, such as expressly stating during the hiring process and interviews that employment with the Company is entirely voluntary, therefore allowing applicants to make their own choice.

In addition, we undertake proactive steps throughout the recruitment process, including the posting of positions on the internet, conducting interviews, and granting applicants the autonomy to decide whether or not to accept our offers of employment. We also emphasize that employees have the freedom to terminate their employment at any time in their own discretion.

Furthermore, a limited number of employees in Lachine, Québec are governed by a collective bargaining agreement, providing them with supplementary protections, working conditions and other benefits.

### Employee Code of Ethical Practices

All our employees are required to sign an attestation and commitment to the Company's Employee Code. The Employee Code aims to protect and maintain the integrity, objectivity and impartiality that characterize MAAX, with the goal of deterring wrongdoing and promoting honest and ethical conduct, as well as encouraging compliance with applicable laws, rules and regulations and prompt internal reporting of violations to the Employee Code.

The Employee Code includes guidance and policies on matters such as employee relations, client service, confidentiality, health, safety and environment, data protection, and conflicts of interest. It also provide for sanctions including termination of employment, contract termination or other legal action in the case of violations of the code.

The Employee Code provides that no retaliatory action will be taken against an employee who makes a report in good faith of violation or suspected violation of the Employee Code by another employee.

### Supplier Code of Conduct

ABG's Supplier Code of Conduct (the applies to all affiliated companies of ABG, including MAAX. The Supplier Code provides that suppliers shall meet internationally recognized laws, regulations, standards and best practices to advance social and environmental responsibility and business ethics.

We expect all suppliers to commit to the Supplier Code, by signing its acknowledgement periodically and during their initial onboarding, and ensure its requirements are implemented throughout their supply chains. The Supplier Code focuses on offering safe working conditions, treating workers with respect and dignity, environmentally responsible operations, and ethical business conduct.

The Supplier Code further requires that suppliers: (i) commit to not using forced, bonded, or indentured labour, involuntary prison labour, slavery, or human trafficking; (ii) pledge to refrain from using child labour or forced labour in their operations or within their supply chains; (iii) adhere to legal limits on working hours to prevent worker strain, reduce turnover, and minimize the risk of injuries and illnesses; (iv) commit to complying

with applicable wage and labour laws, ensuring that workers receive fair compensation; (v) affirm that workers will not be subjected to illegal or inhumane treatment, including sexual harassment or abuse, discrimination, corporal punishment, or mental and physical abuse; (vi) maintain workforces free from unlawful harassment and discrimination; and (vii) allow workers to exercise their right to freely associate, join or not join labour unions, seek representation, and participate in workers' councils.

The failure to comply with the Supplier Code or to notify the Company of non-compliance may result in the termination of the business relationship and any agreement with the supplier at the sole discretion of the Company.

While the Supplier Code does not specifically provide for a grievance mechanism, it requires to protect the identity, confidentiality and non-retaliation of whistleblowers.

## **Due Diligence Processes**

MAAX places great importance on conducting thorough analyses of the locations where we conduct business. We have a dedicated team based in China that carries out on-site inspections and assessments to gain a comprehensive understanding of supplier operations and ensures adherence to ethical labour practices. These inspections are not limited to China and extend to other countries where our suppliers are located.

We also maintain partnerships with domestic and US-based suppliers. These suppliers undergo rigorous screening processes to ensure compliance with labour laws and ethical standards. Our commitment to preventing forced labour and child labour extends to all aspects of our supply chain, including domestic sourcing.

In order to tracking implementation and results, we review the results of our audits and track which suppliers have signed the Supplier Code to better assess their commitment to responsible business practices.

## **5. RISK ASSESSMENT & REMEDIATION MEASURES**

We began mapping our supply chain to increase the visibility we have on our suppliers, to better understand our suppliers exposure to risks by sector and country and to identify suppliers providing goods and services that are at high risk for forced or child labour. This mapping enables us to prioritize our due diligence efforts, conduct risk assessments, and implement risk mitigation strategies to address forced labour and child labour risks effectively. To date, no definitive risk areas have been identified, but supply chain risks will be further analyzed as the assessment process will continue in 2024 and beyond.

While we strive to establish long-term business relationships with reputable suppliers, we recognize that there may be areas within our supply chain that require further scrutiny, mainly due to the type of products we import, the raw materials used in our products and the risks related to certain Tier 1 and Tier 2 suppliers. Our focus on reputable suppliers and long-standing partnerships is aimed at minimizing the risk of forced labour or child labour in our supply chain. However, given the complexity and extensive reach of our supply chains, it is essential that we remain vigilant in assessing and mitigating these risks.

We recognize that maintaining transparency and visibility into our supply chain is crucial. We strive to foster open communication with our suppliers, conducting ongoing assessments and evaluations to ensure compliance with our standards. This includes working to enhance visibility into the practices of our tier two and tier three suppliers, as well as those further down the supply chain, up to the raw materials. By doing so, we can ensure that all suppliers, regardless of location, uphold our commitment to preventing forced labour and child labour.

To date, we have not been made aware of specific instances of forced labour or child labour and as such, no remediation measures were necessary to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families resulting from any such measures.

## 6. ASSESSING THE EFFECTIVENESS OF OUR APPROACH


Our commitment to combating forced labour and child labour remains steadfast, and we are continuously dedicated to identifying, assessing, and addressing these risks within our operations and supply chain. As part of this ongoing effort, our Company is actively implementing proactive measures to prevent and address child labour and forced labour. We are conducting thorough reviews of our policies and practices to ensure they align with current standards and best practices. These steps exemplify our unwavering commitment to upholding human rights and fostering a responsible and ethical supply chain.

## 7. APPROVAL AND ATTESTATION

This report was approved by the Board of Directors of MAAX Bath Inc. on May 30, 2024 pursuant to paragraph 11(4)(b)(ii) of the Act and constitutes the joint report for the entities listed in the first section of this report for the financial year ending December 31, 2023.

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 Company. 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 indicated above.

I have the authority to bind MAAX Bath Inc.



Full name: Benoit Savoie Defesne

Title: Director, Treasurer

Date: May 30, 2024