Peak Product Manufacturing Inc.'s Supply Chains Act Report (2025)

ABOUT THIS REPORT

Peak Products Manufacturing Inc. ("**Peak**"), Peak Innovations Inc. and Mountaintop Holdings Inc. have prepared this report (this "**Report**") pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the financial year ended September 30, 2025. All references in this Report to "**Peak**", "**we**", "**us**" or "**our**" refer to Peak Products Manufacturing Inc. unless otherwise indicated. This is a joint Report made on behalf of the entities listed above (collectively, the "**Peak Group Reporting Entities**").

This Report describes the steps taken to enhance transparency in our supply chains by outlining our actions during the 2025 financial year to prevent and reduce the risk that forced labour or child labour (collectively, "**Modern Slavery**") is used at any step of our production of goods in Canada or elsewhere, or of goods we import into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

The Peak Group Reporting Entities do not currently report under similar legislation in any other jurisdiction.

INTRODUCTION

At Peak, we are committed to upholding the highest standard of ethical conduct and corporate responsibility in all aspects of our business. As part of this commitment, we recognize the importance of preventing and addressing Modern Slavery within our Canadian supply chain and globally.

Peak prohibits the use of Modern Slavery in any aspect of our operations and supply chain. We are dedicated to ensuring that all individuals involved in our supply chain are treated with dignity and respect, and that our business practices align with international standards and regulations pertaining to human rights.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Company Structure

Peak Products Manufacturing Inc. is a corporation incorporated pursuant to the *Canada Business Corporations Act* and headquartered in Richmond, British Columbia. Peak Innovations Inc. is a corporation incorporated pursuant to the Canada Business Corporations Act and headquartered in Richmond, British Columbia. Mountaintop Holdings Inc. is a corporation incorporated pursuant to the *Business Corporations Act* (British Columbia) and headquartered in Richmond, British Columbia. Peak Innovations Inc. and Mountaintop Holdings Inc. are Canadian entities that directly or indirectly control one or more of the entities comprising the Peak Group Reporting Entities and whose reporting obligations arise only by operation of section 9(c) of the Act.

In 2025, Peak employed approximately 75 to 120 people across operations in Canada.

Activities and Operations

Peak is an international leader in the home renovation and outdoor living products sector, offering over 1,000 products. These include aluminum railings, fencing and decking products, gutters,

gardenware and much more. In Canada, Peak products are sold exclusively through The Home Depot, the world's largest home improvement retailer. Peak has been supplying The Home Depot since 1999.

Our Supply Chains

Our supply chain involves the sourcing of quality materials, packaging, and manufactured products including metal products. These products are shipped by air, rail, truck and boat. In some instances, these products may originate from countries or regions with a higher risk of forced or child labour.

POLICIES AND DUE DILIGENCE

Policy on Understanding and Prevention of Forced Labour and Child Labour in the Canadian Supply Chain

Our Policy on Understanding and Prevention of Forced Labour and Child Labour in the Canadian Supply Chain (the "**Modern Slavery Policy**") reinforces our commitment to prohibiting the use of Modern Slavery in our operations and supply chain, educates our team members, vendors and contractors on the critical issues of Modern Slavery and fosters a culture of awareness and accountability.

The Modern Slavery Policy sets out our responsibility to ensure that all parties affiliated with the organization are treated fairly, equitably, and respectfully, and to provide a learning, working and living environment that is free from use of Modern Slavery in any aspect of our operations and supply chain. Included in our commitments to upholding this responsibility is:

- Establishing a clear and transparent company policy that sets out the measures to prevent forced labour and child labour;
- Adopting recruitment and human resource practices (e.g. concerning wages, working hours and employment contracts) that minimize the risk of forced labour;
- Taking reasonable steps to ensure employment agencies that Peak is affiliated with are not charging workers recruitment fees to get jobs and are operating on a high standard of ethics;
- Prohibiting the use of abusive practices or threats to coerce migrant workers to work, for example threats of denunciation to authorities;
- Taking a "zero tolerance" approach to physical violence; imprisonment or confinement at the workplace; sexual violence; deprivation of food, shelter or other necessities; and verbal abuse and threats;
- Taking preventative measures against Modern Slavery and raising awareness about the vulnerabilities and hazards that can face irregular migrants; and
- Staying informed and abiding by local laws and practices regarding working hours, overtime, working conditions, human rights, etc. of workers.

Included in our Modern Slavery Policy is a training module from Verité that provides an introduction to forced labour. It is mandatory for all employees to complete this training module.

Any individuals or entities found to be in violation of the Modern Slavery Policy may face disciplinary action, up to and including termination of employment or contract.

Because Peak is an exclusive supplier of The Home Depot, we are required to comply, and expect our suppliers to comply, with The Home Depot's Responsible Sourcing Supplier Manual (the "**Supplier Manual**"). Under the Supplier Manual, Peak and our suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate and are prohibited from using Modern Slavery in their operations. Further, Peak and their suppliers must allow for The Home Depot to conduct announced and unannounced on-site audits of production factories to monitor compliance with the Supplier Manual.

POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

In 2025, Peak took the following steps to prevent or reduce the risk of Modern Slavery in our supply chains and operations:

- Reviewed Peak Modern Slavery policy and responsible sourcing practices by our suppliers ;
- Continued employee training from Verite.org;
- Conducted identification of suppliers located in higher risk countries or regions and mapped these suppliers for risk with reference to the Trafficking in Persons Report published by the US Department of State; and
- Obtained independent responsible sourcing reports for some suppliers identified as being located in higher risk countries or regions.

Potential Risks in Our Operations

Peak considers the risk of Modern Slavery occurring within our operations to be low. This is specifically due to the fact that Peak's workforce exists only within Canada, which has comprehensive and strict labour, employment, and human rights laws.

Potential Risks in Our Supply Chains

We recognize that there is a risk of Modern Slavery occurring within our supply chains. We understand that geographic considerations, the nature of the raw materials and particular industries can carry a higher risk of Modern Slavery. There are also risks linked to certain industries even in countries considered to have lower risks of Modern Slavery. However, as a whole, we view the risks of Modern Slavery in our supply chains as low to moderate.

Through our assessment of our operations and supply chains regarding the risk of Modern Slavery being used, we did not identify any instances of Modern Slavery. Accordingly, no steps were required to remediate Modern Slavery, or the loss of income associated with remediation efforts.

Management and Mitigation of Potential Risks

As part of our commitment to corporate social responsibility, Peak has been a passionate supporter of numerous charitable organizations for many years, particularly in the areas of housing, health care and the arts.

For example, Peak is proud to support The Home Depot Canada Foundation and its mission to prevent and end youth homelessness in Canada. For Peak, our support is a way for us to give

back to the customers and communities we serve. Peak has contributed several million dollars towards The Home Depot Canada Foundation's goal of investing $125 million by 2030 to expand stable housing for youth, provide quality wraparound community support and increase youth employment readiness.

TRAINING

Peak conducts mandatory training for all employees on the impact of Modern Slavery and each employee's responsibility to identify and report any possible instances of improper activity.

As we continue the development of our actions to prevent and reduce the risk of Modern Slavery in 2026, we will consider implementing, as appropriate, a more focused training module on Modern Slavery. As part of this training, we will continually emphasize preventative measures against slavery and raising awareness, staying informed and abiding by all laws, zero tolerance for physical violence or confinement and prohibiting the use of abusive practices or threats to coerce workers to work. Employees, contractors and suppliers may report concerns regarding forced labour or child labour through established management, HR or reporting channels without fear of retaliation.

ASSESSING EFFECTIVENESS

We intend to continue to consider the need to implement measures to assess the effectiveness of the processes we have in place, as set out in this Report, based on our evaluation of potential risks, as described in this Report.

APPROVAL & ATTESTATION

This Report was approved pursuant to section 11(4)(b)(ii) of the Act by the Board of Directors or other authorized governing body of each of the Peak Reporting Entities on May 29, 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 the report for the 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.

Tim Erickson, VP of Human Resources

I have the authority to bind Peak Products Manufacturing Inc., Peak Innovations Inc. and Mountaintop Holdings Inc.

29 May 2026