

Anti-Slavery Statement

Transparency Statement pursuant to California SB 657
and
UK Modern Slavery Act

Revised May 2025

Introduction

As an ethical business, Oldcastle BuildingEnvelope, Inc. and its subsidiaries (“OBE”) are committed to abiding by the principles outlined in its Code of Business Conduct (“COBC”) and doing business in a sustainable, responsible and ethical manner with its customers, suppliers, business partners, local governments and communities, shareholders and employees alike. These core values have guided OBE’s approach to business and are a fundamental requirement of every OBE employee and business. This Statement, which is made on behalf of OBE, outlines the steps that OBE has taken to ensure that slavery and human trafficking is not taking place within either its own businesses or its supply chains.

OBE strongly opposes all forms of slavery, human trafficking and forced labor. OBE does not use slave or forced labor and does not knowingly conduct business with any supplier engaged in such practice.

About OBE

OBE is North America’s leading vertically integrated manufacturer, fabricator and distributor of architectural hardware, glass and glazing systems. Headquartered in Dallas, Texas, OBE is a world-class building products company with significant presence in every major market in the U.S. and Canada. OBE manufactures high-performance architectural glass products and aluminum framing systems and distributes complementary hardware and glazing supplies. OBE also distributes through its subsidiary, C. R. Laurence Co., Inc., (“CRL”), architectural metals, glass fittings, and professional-grade glazing supplies to markets in the U.S., Australia, Germany, and the United Kingdom. OBE delivers products to a broad customer base of architects, glaziers, contractors and developers serving diversified residential and commercial construction end-markets. With approximately 6,200 employees, OBE operates in more than 80 manufacturing and distribution facilities in five countries.

Implementing Robust Policies

OBE implements a formal COBC which sets out policies, guidelines, training, monitoring and review mechanisms to uphold OBE’s principles to abide by good business practices and standards. OBE’s commitment to human and labor rights is reflected in the COBC and through its interactions with its employees. OBE’s company officers and managing directors have overall responsibility for ensuring that OBE’s core principles and policies, including employment policies, guidelines and objectives comply with OBE’s legal and ethical obligations. They are supported in this role by OBE’s Chief Human Resources Officer and HR team and its General Counsel and supporting Legal team.

Understanding Risk

OBE conducts periodic reviews of social performance in its operations. Human and labor rights are a focus of such reviews. From a risk assessment perspective, considering its geographic and operational footprint, OBE has determined that within its sphere of influence, the greatest risk area for modern slavery to occur is within its supply chain. OBE’s actions are therefore focused on this area. OBE assesses supply chain risk at a commodity level against criteria that are tailored to its business and in accordance with its Supplier Code of Conduct. By managing risk and opportunity, OBE can obtain greater insight into its supply chain and ensure that the required improvements are integrated into its strategy plans and procurement decisions.

OBE actively implements policies to address any human rights or labor risks identified within its own operations. OBE requires that these policies be embedded within its businesses and local operations. In general, because OBE operates directly with employees in countries where employment legislation incorporates the relevant international accords and conventions, OBE believes it has eliminated such risks in those countries.

Developing Awareness

All OBE employees are trained on the COBC, which can be downloaded from the OBE corporate website: www.obe.com. The Supplier Code of Conduct is distributed to suppliers and is also available from the OBE corporate website: www.obe.com. For procurement teams, OBE has undertaken a series of modern slavery training sessions involving customers, suppliers and stakeholder groups to ensure that OBE raises awareness and knowledge of international legislation banning modern slavery, not just within OBE, but in the wider industry.

Assuring Standards

OBE carries out periodic compliance certification processes which require the managing directors of each operating company, globally, to confirm implementation and compliance with OBE's COBC and its underlying policies. OBE's central procurement team also undertakes a specific risk assessment for all our strategic spend. This includes an assessment of labor practices. If any specific risks are identified in our supply chain, OBE then seeks to manage and understand suppliers' performance further and build on their capacity and capability to improve. OBE also has a due diligence process to ensure conflict minerals are absent from its supply chain. Its disclosure in this regard is available on www.obe.com.

Enabling a “Speak Up” Culture

OBE encourages colleagues and partners to raise any suspicions they may have that slavery, in any form, may be taking place in our business. OBE has a 24/7 confidential “Hotline” facility in place, available to employees and external stakeholders alike, to report issues that concern them, including possible human rights violations and infringements of labor standards. To contact the OBE Hotline, visit www.lighthouse-services.com/obe or call 833-204-8782. Hotline posters are in place at all OBE company sites and every report is investigated. Appropriate actions are taken based on the investigation's findings.

Conclusion

OBE is committed to increasing industry awareness and knowledge in banning modern slavery. OBE implements its social policy to address the issue within our business. To address the issue within its supply chain, OBE implements its Supplier Code of Conduct, which includes the OBE principles on ethical procurement. OBE has processes in place to understand risks, develop awareness, assure standards and enable a “Speak Up” culture.

For further information please see www.obe.com.