

# **FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS**

**2024 Annual Report**

**LEPAGE**  
**MILLWORK**



# Structure and Activities



**Risk Prevention  
and Reduction**



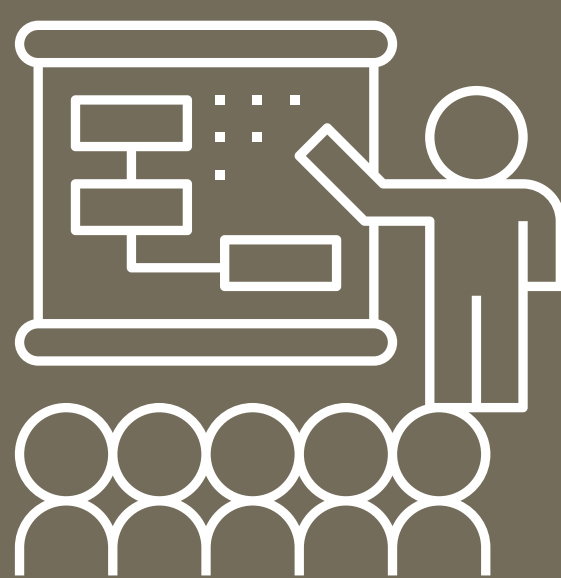
**Policies and Due  
Diligence**



**Supply Chain and Risk  
Management**



**Remediation**



**Training**



**Effectiveness Evaluation**

# Structure and Activities

## About

This report focuses on Alphonse Lepage Inc., also known as Lepage Millwork, a corporation under the Quebec Business Corporations Act, for the period from April 2024 to March 2025.

This report outlines the measures our company has taken to mitigate risks related to modern slavery, including forced labour and child labour in our operations and supply chains, in accordance with the Canadian Act on Fighting Against Forced Labour and Child Labour in Supply Chains.

Alphonse Lepage has engaged the services of a third party, Groupe Conseil C-TPAT Inc (GCC), which specializes in risk assessment in supply chains and logistics, to assist us in analyzing and improving our processes to minimize the risks of using forced labor and child labor in our supply chains.

## Our Company

Alphonse Lepage founded his furniture and window company in Rivière-du-Loup, Quebec in 1947. For over 75 years, Lepage has contributed to the economic growth of the region, being a key local job creator and using regional suppliers for its products. Located in Rivière-du-Loup, Quebec, with more than 300,000 square feet of production space, our company is proud to be part of a thriving community, repeatedly recognized as one of Canada's most entrepreneurial cities.

Our meticulous craftsmen bring decades of expertise to the creation of high-quality, handcrafted doors and windows. Designed with innovative technology, our doors and windows offer effortless operation, environmentally friendly energy options, and an impressive range of custom finishes.

At Lepage, our commitment to being an environmentally friendly company and reducing our carbon footprint is paramount. We primarily source from local and regional suppliers. We schedule product deliveries to maximize space in each truck, significantly reducing air pollution caused by non-optimized and repetitive transport. We also use 100% of all wood waste to produce heat and steam for our production facilities, reducing reliance on fossil fuels and our carbon footprint.

In 2022, a new chapter was written as Lepage Millwork celebrated its 75th anniversary, now employing nearly 475 people at its plant and headquarters located at 141 Chem. des Raymond, Rivière-du-Loup, QC G5R 4L9.



# PREVENTION AND RISK REDUCTION MEASURES



Alphonse Lepage is certified under the voluntary public-private partnership program, Customs Trade Partnership Against Terrorism (CTPAT), led by the United States Customs and Border Protection Agency. This program focuses on safeguarding and implementing preventive measures to reduce the risks of illegal trafficking throughout the cross-border supply and logistics chain.

Among the criteria to meet, we must conduct checks concerning social compliance and modern slavery with our business partners.

Alphonse Lepage conducted an external assessment with the help of GCC and developed an action plan, implementing new mitigation measures to enhance our practices for preventing and reducing the risks of modern slavery in our operations and supply chains, such as:



Modern slavery is now integrated into the mandate of the management committee, which is responsible for assessing the effectiveness of governance and measures in place to prevent forced labor and child labor.



Conducting an external assessment of the risks of forced labour and child labour within the supply chains.



Development of our policy on modern slavery.



Drafting a Supplier Code of Conduct to raise awareness among our partners and assert our firm stance against any form of forced labour and/or child labour in our supply chains.

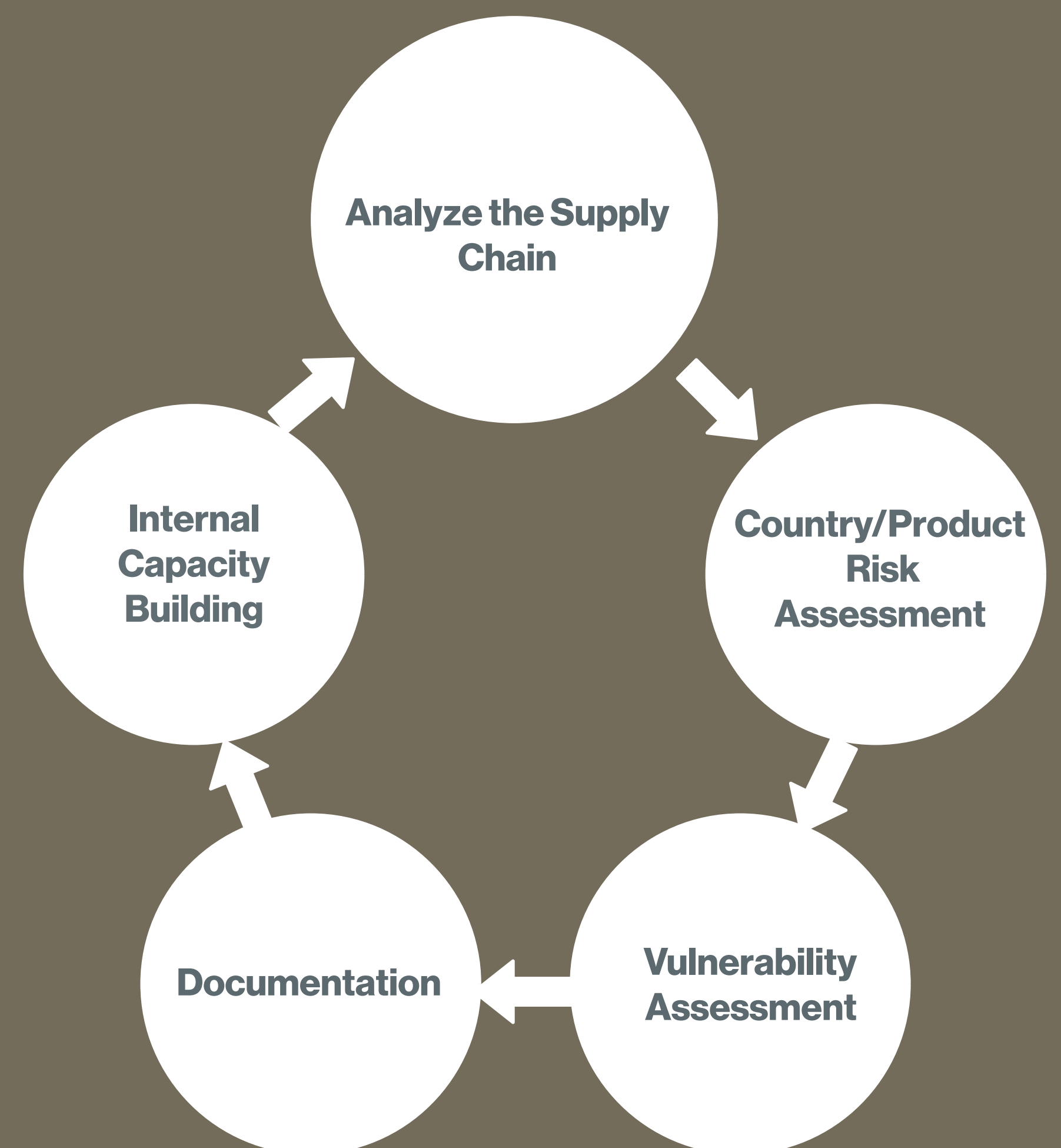


Carrying out a risk analysis within our supply chain to prioritize areas that may pose higher risks of forced labor or child labor and focus our due diligence efforts there.

# SUPPLY CHAIN AND RISK MANAGEMENT

## Methodology

Our 5-step risk analysis is grounded in the proven CTPAT program method, adapted for assessing risks of forced labor and child labor in activities and supply chains.



## Our Supply Chain

We conduct an assessment of our direct international purchases, starting with a sample analysis of customs entries in Canada and originating countries. This is complemented by an evaluation of our key local and international first-tier suppliers involved in our supply chains.

Based on this, we develop strategic recommendations and implement targeted action plans to eliminate forced labor and child labor across all our operations and supply chains. Our goal is to ensure ethical and legal compliance throughout our business activities, thereby reinforcing our commitment to rigorous corporate social responsibility.

Alphonse Lepage sources the majority of its goods and raw materials from North American suppliers, accounting for 98% of its procurement, with less than 2% from South America, Africa, and the Asia-Pacific when acting as the official importer.







## Analysis Summary

We assess that the direct inputs in our supply chain for product manufacturing predominantly originate from North America, posing a low risk, and no modern slavery is identified in this segment of our supply chain.

## Supplier Evaluation 2024-2025

We are conducting a deeper analysis of a portion of our supply chain from certain countries of origin that may present a higher risk.

We have distributed self-assessment questionnaires on modern slavery to selected suppliers and evaluated them to better identify risks within our supply chain.

We will continue to assess more of our suppliers annually, based on this evaluation, and remain vigilant in our verification process.

## Temporary Foreign Workers

In Canada, Alphonse Lepage hires foreign workers and minimizes these risks through a rigorous hiring process.

We use an external firm to assist with candidate searches, pre-screening processes, and conduct hiring internally according to our high standards and the candidates' desire to establish themselves long-term in Canada.

Working conditions respect human rights for all employees, including temporary foreign workers.

# DUE DILIGENCE POLICIES AND PROCESSES

We have a purchasing policy that requires every team member involved in procurement processes to act with integrity, fully respecting our values and mission, ensuring good relations with suppliers, and rejecting any improper or unethical behavior. We've enhanced this policy by incorporating the protection of human rights to prevent the use of forced labor and child labor in our operations and supply chains.

We have established a governance structure specifically designed to strengthen the enforcement of our policies against forced labor and child labor. Our management committee coordinates the integration of principles to combat modern slavery into all of Alphonse Lepage's activities.

Alphonse Lepage relies on its well-established leadership and governance, strict compliance standards, and supplier code of conduct to ensure the protection of the rights of its clients, employees, and supply chain workers. This commitment to human rights stems from a deep belief in the importance of integrity and ethics, aiming to create a safe and inclusive work environment for all stakeholders.

Alphonse Lepage is firmly committed to combating forced labor and child labor in its supply chains by conducting rigorous due diligence assessments to identify, address, and mitigate risks related to modern slavery and human rights violations. Our approach includes an annual risk analysis of these operations and key suppliers.

## Modern Slavery Policy

Alphonse Lepage is resolutely committed to preserving human dignity and places great importance on promoting equality and the protection of human rights in all its activities, supply chains, and business relationships. That's why we are dedicated to providing a safe and inclusive work environment.

This commitment is reflected in our Modern Slavery Policy, which draws on best practices and international standards.



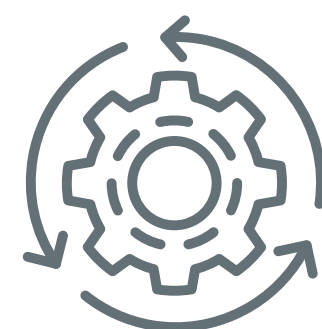


# Code of Ethics



Alphonse Lepage is set to introduce a supplier code of conduct in the coming year. This code will require suppliers to comply with all applicable laws and regulations in the jurisdictions where they operate. It will strictly prohibit the use of forced labor, child labor, or any form of involuntary work.

## Effectiveness Assessment



During the reference year, the company implemented measures to mitigate risks associated with forced labor and child labor, both within its operations and supply chains.

We have begun developing a continuous improvement process, along with defining performance indicators. This initiative aims to strengthen our existing actions and expand our efforts to prevent and reduce risks across all activities and supply chain partners.

## Reporting



In the upcoming year, we will establish clear guidelines on actions to take in cases of modern slavery. These guidelines will assist employees in identifying and reporting such situations, while specifying measures to prevent or address them, ensuring the protection of vulnerable workers.

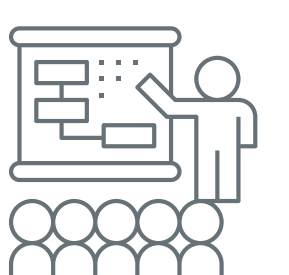
Our employees in contact with suppliers are informed and required to report any potentially illegal or unethical behavior that may catch their attention, including the presence of modern slavery in the supply chain.

## Remediation



So far, we have not identified any forced labor or child labor in our operations and supply chains, which has allowed us to determine no loss of income for vulnerable families. We remain vigilant and will analyze more closely certain higher-risk areas of our direct international supply chain.

## Training



In 2024, an awareness session on modern slavery was organized to familiarize our management committee and procurement team with these issues.

The goal of this awareness is to collectively respect and protect human rights, contributing to the global effort to eradicate all forms of modern slavery.



# APPROVAL AND CERTIFICATION

In accordance with the requirements of the Law, particularly Article 11, I certify that I have reviewed the information contained in the report of Alphonse Lepage Inc.

To the best of my knowledge, and after exercising reasonable diligence, I confirm that the information in the report is true, accurate, and complete in all important respects for the purposes of the Law's application, for the aforementioned reporting year.

I have the authority to bind Alphonse Lepage Inc.



François-Xavier Bonneville

Chief Executive Officer

May 22, 2025