

**HunterDouglas** 

**MODERN SLAVERY STATEMENT  
FY 2023**



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# 1 INTRODUCTION

Hunter Douglas Canada Holdings Inc. (“Hunter Douglas Canada”) has prepared this joint report (the “Report”) on behalf of itself and Hunter Douglas Canada LP, which covers the trading brands Hunter Douglas Canada, Custom Brands Group, and Levolor (collectively, the “HD Canada Reporting Entities”). This Report is made pursuant to sections 11(1) and 11(3) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Canadian Act”). It describes the steps taken by the HD Reporting Entities during the financial year ending 31 December 2023 to prevent and reduce the risk of modern slavery occurring in their operations and supply chains.

The HD Reporting Entities are wholly owned subsidiaries of Hunter Douglas Group Limited, the ultimate parent company. Hunter Douglas Group Limited and its subsidiaries (collectively, the “Hunter Douglas Group”) are opposed to modern slavery in all its forms, including slavery, servitude, forced and compulsory labour, human trafficking, deceptive recruiting for labour or services, debt bondage, forced marriage, and child labour (collectively, forms of “modern slavery”). The HD Reporting Entities recognise that modern slavery presents serious human rights issues, and we are committed to operating in a responsible and ethical manner.

The HD Reporting Entities do not report under similar legislation in any other jurisdiction. However, companies within the Hunter Douglas Group report on modern slavery under Section 54 of the United Kingdom’s Modern Slavery Act 2015, found here; Section 14 of the Australian Modern Slavery Act 2018, found here; and the California Transparency in Supply Chains Act, found here.

All references to “we,” “us,” “our,” or “Hunter Douglas” in this Report refer to the HD Reporting Entities unless the context dictates otherwise. In preparing this Report, we consulted with the Hunter Douglas Group.



## 2 OUR STRUCTURE, OPERATIONS & SUPPLY CHAINS

The Hunter Douglas Group is a global market leader in window coverings and a major manufacturer of architectural products. The Hunter Douglas Group was established in 1919 in Germany by Henry Sonnenberg. On 30 December 2021, Hunter Douglas and 3G Capital, a global investment firm and private partnership, announced that Ralph Sonnenberg, the controlling shareholder of Hunter Douglas Group Limited, had entered into a definitive agreement to transfer a controlling interest in the Company to 3G Capital. On 25 February 2022, 3G Capital Group acquired a 75% holding in Hunter Douglas, with the Sonnenberg Family retaining a 25% holding.

The Hunter Douglas Group is comprised of approximately 150 subsidiary companies with manufacturing and assembly operations in more than 50 countries. The Hunter Douglas Group employs more than 22,000 people worldwide.

We aspire to help people live beautifully in a connected, energy-efficient space; our dream is to be the fastest growing, most loved, and most efficient window coverings company in Canada. Globally, the Hunter Douglas Group's culture is one of the key drivers of our strategy to achieve these goals, and it encompasses our core values of transparency, entrepreneurship, accountability, and meritocracy. Communicated consistently throughout the Company, these values call for the highest ethical standards in all interactions with all stakeholders and partners. For more information about Hunter Douglas, please visit our corporate website at <https://www.hunterdouglasgroup.com/>.

Hunter Douglas Canada is a Canadian corporation incorporated pursuant to the Business Corporations Act Alberta and is headquartered in Oakville City, Ontario. We have a single shared warehouse/office and employ approximately 142 people.

Hunter Douglas Canada LP, is the limited partner of Hunter Douglas Window Fashions Canada Inc., incorporated pursuant to Business Corporations Act Alberta and is headquartered in Oakville City, Alberta.

## 2 OUR STRUCTURE, OPERATIONS & SUPPLY CHAINS

Together, the HD Reporting Entities offer the finest quality window treatments, including blinds, shades, and shutters. We have a wide range of products designed to enhance the aesthetics and functionality of windows. Our product offerings include innovative designs, energy-efficient solutions, and customizable options for residential and commercial spaces. With millions of products sold and a lifetime guarantee, we aim to prioritize both quality and customer satisfaction.

We operate through a distribution network of thousands of independent business owners who are passionate about selling luxury window treatments. These business owners receive resources for success, including sampling, merchandising, training, and state-of-the-art customer relationship management tools.

Our primary operations in Canada are the sale and distribution of products from the Hunter Douglas Group. Accordingly, our supply chains predominately consist of window covering products that are principally sourced from Hunter Douglas Group manufacturing facilities, which are owned and operated by the Hunter Douglas Group, based outside of Canada.

# 3

## POLICIES & DUE DILIGENCE

As part of the Hunter Douglas Group, we seek to work alongside our employees and third-party business partners, including suppliers, to ensure that we prevent and reduce the risk of modern slavery in our operations and supply chains. The need to manage such risks is a key consideration behind the following policies and due diligence processes:

### A. Policies

As part of the Hunter Douglas Group, we benefit from and apply the various policies and processes that constitute the foundation of our approach to ethics, human rights, and modern slavery.

#### I. Code of Business Conduct

The Code of Business Conduct is applicable to both employees and third-party business partners, and it makes clear that the Hunter Douglas Group is “committed to business practices that respect human rights in every jurisdiction in which we operate and throughout our global operations and supplier networks.”

#### II. The Whistleblower Hotline

While the Code of Business Conduct serves as a practical guide to ethical decision-making, Hunter Douglas makes available to all employees (as well as customers and third-party partners) an Ethics Helpline that enables individuals to raise any questions or concerns about legal or ethical obligations. The Ethics Helpline is a confidential and secure means of reporting in the local language that is managed by an independent organization and available anywhere in the world, 24/7. Where local laws permit, individuals can file and follow up on reports anonymously.

#### III. The Supplier Code of Conduct

At Hunter Douglas, we expect that our suppliers agree to comply with the Hunter Douglas Group Supplier Code of Conduct, which includes the minimum sourcing standards that suppliers are expected to meet as a condition of doing business with Hunter Douglas. The Supplier Code of Conduct contains specific provisions addressing modern slavery stating, for example, that “[t]he supplier does not use forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor. The supplier is responsible for employment eligibility fees of foreign workers, including recruitment fees.” In addition, the Supplier Code of Conduct includes specific wording prohibiting conduct associated with child labour, human trafficking, non-compliance with local wage laws, and unauthorized subcontracting.

## 3 POLICIES & DUE DILIGENCE

### B. Third-Party Due Diligence

The Hunter Douglas Group's Global Compliance Team and Procurement function have collaborated to evaluate and onboard third-party risk management tools to improve supplier due diligence and risk assessments, including those applicable to the HD Reporting Entities. As part of and in conjunction with the Hunter Douglas Group, we have begun reviewing our third-party diligence and risk management program to assess whether and where there is a need for improved monitoring of modern slavery risks and other human rights issues.



# 4

## POTENTIAL RISKS OF MODERN SLAVERY IN OUR OPERATIONS & SUPPLY CHAINS

Modern slavery is an umbrella term that covers various forms of illegal exploitation of people for commercial or personal gain. We at Hunter Douglas are committed to preventing and reducing the risk of modern slavery occurring in our operations and supply chains. Accordingly, in 2023, Hunter Douglas and/or the HD Reporting Entities took the following steps to prevent and reduce the risk that modern slavery is present in our operations and supply chains:

- The Hunter Douglas Group rolled out an updated, comprehensive Code of Business Conduct to serve as a practical guide to living our core values—i.e., transparency, entrepreneurship, accountability, and meritocracy—to promote the safety of our people, the sustainability of our products, and the highest level of confidence and respect from our stakeholders.
- The Hunter Douglas Group’s Global Compliance Team and Procurement function began reviewing our third-party diligence and risk management program to assess whether and where there is a need for improved monitoring of modern slavery risks and other human rights issues.

We assess modern slavery risks with reference to relevant risk indices, including the Walk Free Foundation Global Slavery Index<sup>1</sup>, and information supplied to us through <https://www.responsible sourcingtool.org/> and our extensive stakeholder networks (e.g., customers, suppliers, licensors, industry associations, and governments). Hunter Douglas is continually looking to find new means of identifying and mitigating these risks.

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<sup>1</sup>Walk Free, The Global Slavery Index 2023, Minderoo Foundation, available at: <https://walkfree.org/global-slavery-index/>.



## A. Operations

In FY 2023, Hunter Douglas assessed the risk of modern slavery in our direct business operations to be low. All of our employees are based in Canada and, through the Hunter Douglas Group, we have a robust system of HR policies and procedures that promote compliance with legally mandated employment entitlements and awards across our workforce.

## B. Supply Chains

Hunter Douglas recognizes that through the window furnishing products sourced from third-party supplier factories and local suppliers, we can be exposed to the risk of modern slavery in the manufacturing process overseas. We also recognize that modern slavery risks are more likely to exist in jurisdictions that historically demonstrate less respect for human rights principles and where there is lack of formal labour standards or a historical disregard for them.

The Global Slavery Index has identified a shortlist list of 15 imported products common in G20 countries, such as Canada, that present a heightened risk of forced labour. While Hunter Douglas's primary product imports (i.e., window furnishings) do not appear on the list, certain raw materials and components used in window furnishings are included on the short list as set out in the table below:

<b>Global Slavery Index: Importing Products at Risk of Forced Labour</b>	<b>Potential Exposure to Hunter Douglas Supply Chains</b>
Electronics	Electronic components are used in motorized window furnishings
Textiles	Fabrics are used in manufacturing window furnishings (e.g., curtains)
Timber	Timber is used in manufacturing window furnishings

The policies and procedures set out in this Report operate to mitigate the above-identified risks.

During the reporting period, Hunter Douglas is not aware of any instances of child or forced labour in its supply chains or operations. Accordingly, remediation steps were not required, and none were taken, including steps directed at remediating the financial impact on the most vulnerable families flowing from remediation efforts.

## 5 TRAINING

At Hunter Douglas, employees complete an annual training session on the Code of Business Conduct. As of 2023, this training includes a module on human rights, reminding employees to “take efforts to ensure that all of our operations and processes (including, but not limited to, procurement, manufacturing, fabrication, logistics, etc.) remain in compliance with human rights regulations across the globe.”

## 6 ASSESSING EFFECTIVENESS

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chains will be an ongoing and evolving process, and we are committed to building upon the efforts taken to date. At this stage, we are not able to adequately evaluate the effectiveness of measures we have undertaken to identify and address modern slavery risks. However, we will continue to work on developing frameworks, processes, and goals that will enable us to measure the effectiveness of the actions we are taking to identify and address modern slavery risks in our operations and supply chains.

## APPROVAL & ATTESTATION

This Report was approved by the board of directors for Hunter Douglas Canada Holding Inc., which is the General Partner of Hunter Douglas Canada LP:

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or 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 Canadian Act, for the reporting year listed above.



5/20/24

**Christine Mikler**

**Date**

Director & Board Member of Hunter Douglas Canada Holdings Inc.,  
which is the general partner of Hunter Douglas Canada LP

I have the authority to bind Hunter Douglas Canada Holdings Inc. and Hunter Douglas Canada LP.