

Fighting Against Forced Labour and Child Labour in Supply Chains: 2025 Report

Introduction

This report represents Maxan Drywall Ltd.'s ("Maxan") second annual disclosure under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). It covers the company's financial year ending April 30, 2026.

Maxan submitted its first report under the Act during the previous reporting year as part of its commitment to responsible business practices and ongoing awareness surrounding forced labour and child labour risks within global supply chains.

Maxan does not engage in or support the use of forced labour or child labour in any part of its operations, to the best of our knowledge. Likewise, we make reasonable efforts to ensure that the materials and services we procure are sourced from reputable suppliers and vendors that align with ethical business practices and applicable legal standards.

While Maxan's operations are primarily service-based and focused within Canada, we recognize that modern supply chains can involve multiple tiers of suppliers and manufacturers with varying levels of visibility. As such, we continue to monitor and evaluate our practices and relationships with suppliers to support responsible sourcing and procurement decisions.

Maxan remains committed to operating with integrity and upholding the safety, dignity, and human rights of individuals connected to our operations and supply chain.

Structure, Activities, and Supply Chains

Structure

Maxan operates under the name Maxan Interior Systems and is a privately held company incorporated under the Canada Business Corporations Act and governed by the laws of Canada. Maxan employs a workforce of over 300 employees across Ontario.

Our operations are organized into key functional areas, including Construction (drywall, acoustics, ceilings), Architectural Walls (demountable partition systems), Service and Repairs, and centralized shared services support teams such as Human Resources, Health & Safety, Finance, and Procurement.

This structure supports collaboration, accountability, and consistency across the organization. The Maxan Way, our values-driven framework, guides how we lead, support employees, and deliver projects across all areas of the business.

Activities

Maxan is an interior systems contractor with office locations in Mississauga and Kitchener, Ontario. Maxan specializes in the industrial, commercial, and institutional construction sector.

Our activities span the full project lifecycle, from estimation and procurement to field execution and project turnover. Safety, partnership, quality, and continuous improvement remain central to how we operate.

Our primary service offerings include:

- Drywall framing, insulation, boarding, and finishing
- Installation of standard and specialty ceiling systems
- Acoustic systems and sound control solutions
- Service and repair work related to drywall and ceiling systems
- Supply and installation of architectural demountable wall systems

Supply Chains

Maxan maintains a centralized procurement process led by an internal team responsible for sourcing and coordinating materials for project sites.

We primarily purchase materials through Canadian suppliers and distributors, many of whom source products through broader North American supply chains. Maxan works with established suppliers and vendors that support the quality, reliability, and operational standards required for our projects.

As part of our procurement approach, we continue to place importance on building relationships with reputable suppliers and remain selective regarding the vendors and manufacturers we work with. While Maxan has not implemented a formal supplier assessment program specific to forced labour and child labour risks, we continue to maintain awareness of these issues and consider supplier reputation, business practices, and industry standing when making procurement decisions.

Policies and Due Diligence Processes

Maxan is committed to operating with integrity, professionalism, and respect for human rights across all aspects of our business.

Oversight of Maxan's broader approach to compliance, responsible business practices, and workplace standards rests with the company's leadership team and Board of Directors. Maxan maintains centralized Human Resources and Health & Safety teams that support compliance, employee training, workplace safety, and adherence to applicable legislation and workplace standards.

Throughout the reporting year, Maxan continued internal discussions regarding supplier relationships, procurement practices, and responsible business conduct. While we have not implemented formal due diligence procedures specific to the Act, awareness surrounding forced labour and child labour risks has increased internally since our initial reporting year.

Maxan also continues to engage with suppliers and vendors that are established within the construction industry and operate within jurisdictions where labour standards and legal protections are generally well-established.

Forced Labour and Child Labour Risk

Maxan's operations are primarily service-based and focused within Ontario's unionized construction industry. Recruitment and hiring are managed internally through our Human Resources department, which provides oversight into hiring practices and employment standards.

Maxan is a voluntary signatory to multiple collective agreements with labour unions across our areas of operation and maintains a strong commitment to workplace safety, employee well-being, and compliance with labour legislation.

While we believe the risk of forced labour and child labour within our direct operations is low, we recognize that some level of risk may exist within broader global supply chains associated with construction materials and manufacturing.

At this time, Maxan has not identified any instances of forced labour or child labour within its operations or supply chain.

Assessment and Management of Risk

Maxan has not yet conducted a formal risk assessment specific to forced labour and child labour within its supply chain. However, during the reporting year, the company continued to build awareness internally regarding these risks and maintained ongoing discussions related to supplier relationships and procurement practices.

As part of our ongoing approach, Maxan continues to prioritize working with reputable suppliers and vendors that align with our operational and ethical expectations.

Maxan intends to continue evaluating opportunities to strengthen awareness, supplier engagement, and internal processes over time as our understanding of reporting expectations and supply chain risks evolves.

Remediation Measures, Including Loss of Income

As of April 30, 2026, Maxan has not identified any instances of forced labour or child labour within its operations or supply chain.

Accordingly, Maxan has not been required to implement any remediation measures related to forced labour, child labour, or associated loss of income.

Employee Training

Maxan's Human Resources and Health & Safety teams continue to provide employee training and awareness related to workplace conduct, human rights, workplace violence and harassment, labour standards, and health and safety obligations.

These policies and expectations are outlined within Maxan's Health & Safety Program and internal workplace policies, which are reviewed and updated regularly.

Employees are expected to comply with these standards and are provided with channels to raise workplace concerns where appropriate.

Effectiveness Assessment

Maxan has not formally assessed the effectiveness of its efforts to prevent and reduce the risks of forced labour and child labour within its operations and supply chains.

However, the company continues to maintain oversight of procurement practices, supplier relationships, and workplace standards through its internal leadership, Human Resources, and Health & Safety teams.

Maxan recognizes the importance of continuing to build awareness and evaluate opportunities for improvement over time.

Approval and Attestation

This report has been approved by the Board of Directors of Maxan.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of President & General Manager, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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 within this report.

Signed in the City of Mississauga, the 14th day of May 2026.

I have the authority to bind Maxan

A handwritten signature in black ink, appearing to read "Dane Flynn", written over a horizontal line.

Dane Flynn
President & General Manager