

Canadian Forced and Child Labour Report

May 31, 2024

This Report is made pursuant to the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Canada Act”) to identify actions taken by Behr Process Canada, Ltd. (“Behr”) during the financial year ended December 31, 2023 to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Behr or of goods imported into Canada by Behr.

About Behr

Behr is a corporation based in Ontario, Canada. Behr’s parent company is Behr Process LLC, which is headquartered in the United States. As a subsidiary of Masco Corporation, Behr Process LLC and its subsidiary comes under Masco Corporation’s compliance policies and programs, including its supplier business practices policy and program.

Masco Corporation is a global leader in the design, manufacture and distribution of branded home improvement and building products. Behr is part of Masco Corporation’s decorative architectural products segment.

Behr sells a wide variety of products (architectural coatings, including paints, primers, specialty coatings, stains, and waterproofing products, as well as paint applicators and accessories) that are manufactured or sourced.

Behr operates two distribution facilities, one in Calgary, AB and the other in Toronto, ON. These facilities receive architectural coatings products and applicators by truck from the United States. The products are stored and subsequently shipped to big-box store customers. Each facility maintains a small office staff and sales leadership and local marketing support staff also office there. There are 21 distribution employees between the two sites. Behr also has 80 sales representatives servicing Home Depot stores across Canada. Those individuals work out of their homes.

As stated, all products shipped into Canada come from US distribution centers. The coatings products are manufactured in the United States with domestic resins, pigments, colorants, and additives. Colorants and additives are also imported from the European Union. Applicators, including brushes, roller covers, roller frames and other convenience tools are manufactured primarily in China, with some brushes and roller covers being assembled in the US with Chinese, Italian and Israeli materials.

Behr’s supply chain operations are managed within the operations department, with support from the procurement and contract management teams and with oversight from Masco Corporation’s Global Supply Chain Services Department.

Actions Taken to Assess and Manage the Risk of Forced and Child Labour

Masco Corporation and its subsidiaries, including Behr, have a longstanding commitment to the ethical and responsible sourcing of goods and supplies for Masco Corporation's family of companies. Masco Corporation's Supplier Business Practices Program (selected features of which are described below) applies to Behr and is relevant to ensuring that Behr is mitigating the risk that forced labour or child labour is used in its operations and supply chains.

In 2023, under the Masco Corporation's supplier business practices policy and program, Behr took the following steps:

- Conducted an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Gathered information on worker recruitment and maintained internal controls to ensure that all workers are recruited voluntarily
- Developed and implemented due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Developed and implemented anti-forced labour and/or -child labour contractual clauses
- Developed and implemented anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Audited suppliers
- Monitored suppliers

Our Policies

Masco Corporation maintains a Code of Ethics, which is available at <https://masco.com/sustainability/corporate-governance/>. The Code of Ethics applies to everyone in the organization and explains Masco Corporation's expectations in areas that can raise ethical or legal concerns. The Code of Ethics requires employees to comply with all Masco Corporation policies and procedures and follow all applicable laws, which includes laws related to forced and child labor. If an employee is in violation of the Code of Ethics, Masco Corporation will (in certain egregious situations) terminate such employee or work with them to remedy the violation. If the effort to remedy the violation is unsuccessful, Masco Corporation may terminate the employee.

As stated in Masco Corporation's Human Rights Policy Statement, which is available at <https://masco.com/sustainability/social/>, Masco Corporation is committed to being a good corporate citizen, operating ethically and responsibly and respecting and promoting human rights. Consistent with this philosophy, Masco Corporation endeavors to uphold responsible business standards and respect and promote human rights through its own policies and practices. Masco Corporation has a company-wide prohibition against the use of child labor and any form of forced labor. Masco Corporation's commitment to promoting human rights is Informed by the UN Guiding Principles on Business and Human Rights and applies to all persons and entities

involved in Masco Corporation's operations, including, without limitation, employees, companies, suppliers, vendors and partners.

Masco Corporation's Supplier Business Practices Policy ("SBP Policy"), which is published at [masco.com/our-suppliers](https://www.masco.com/our-suppliers), formalizes Masco Corporation's commitment to ethical and responsible sourcing of goods and supplies by requiring, among other things, that our suppliers respect our standards and those of our customers, including with regard to compliance with laws, human rights, child labor, human trafficking, slavery, wages and benefits, excessive working hours, corporal punishment, discrimination, safe and clean workplaces and other labor and employment standards.

Masco Corporation's selection and continued use of suppliers is based on the following standards described in the SBP Policy, among others described therein, with respect to all goods that Masco Corporation purchases:

1. Compliance with all applicable laws and regulations.
2. Protecting against the use of workers younger than the minimum age required by law.
3. Protecting against the use of forced labor (i.e., human trafficking and slavery).
4. Providing appropriate wages and benefits as required by law.
5. Protecting against excessive working hours that exceed local laws or business customs.
6. Protecting against physical and mental punishment of workers.

Masco Corporation will not knowingly work with suppliers that do not respect these standards and those of its customers. Masco Corporation periodically assesses its supplier's compliance with these standards and those of its customers. Any reported non-compliance will be investigated and appropriate action will be taken. These standards apply whether the supplier is a Masco Corporation company, an affiliate or a third party.

If a supplier is acting in violation of the SBP Policy, Masco Corporation will (in certain egregious situations) terminate the business relationship with the supplier or work with them to remedy the violation. If the effort to remedy the violation is unsuccessful, Masco Corporation will evaluate its business relationship with that supplier and take appropriate corrective action. Corrective action may include cancellation of an affected order, prohibiting further use of a facility or supplier and reporting the violation to the proper authorities.

Verification of Supply Chains and Auditing of Suppliers

Masco Corporation requires its operating units to have a formal system for reviewing and accepting new vendors. For vendors located outside the United States, Canada and Western Europe, this program requires a physical review of each new factory to ensure it meets at least baseline requirements with respect to applicable laws and working conditions, including laws against forced labour and child labour.

In addition to the process for selecting new vendors described above, Masco Corporation engages in verification of the practices of its existing supplier base (other than suppliers located in the United States, Canada and Western Europe) through periodic announced audits to assess risks and ensure compliance with applicable laws and conditions, including laws against forced labour and child labour. These audits are conducted by Masco Corporation employees for suppliers in China and by third parties for suppliers located in other countries. If significant issues are raised by an audit, we may also conduct a follow-up unannounced audit to address the initial findings. If a supplier refuses access to Masco Corporation's auditors, the relationship with that supplier will be terminated. Masco Corporation's global SBP Policy compliance program is managed from its Shenzhen, China office, supported by in-house and third-party auditors.

Masco Corporation maintains an internal scoring system with respect to its periodic audits of suppliers and records the results in an internal database. Reported instances of non-compliance are further investigated and appropriate action is taken to help ensure that the SBP Policy standards and applicable laws are observed.

Contractual Compliance

Masco Corporation's Purchase Order Terms and Conditions for Masco Corporation's family of companies (published at [masco.com/our-suppliers](https://www.masco.com/our-suppliers)) requires compliance with applicable laws as well as the standards and requirements set forth in the SBP Policy.

The Risk of Forced and Child Labour

The SBP Policy covers all of Behr's suppliers. Based on our internal risk assessment, we conduct our supplier audits on suppliers that are located in certain designated high-risk countries. We generally consider high-risk countries to be countries other than the United States, Canada and countries located in the European Union. We do reserve the right to conduct audits on any supplier where there is a risk of forced labor.

Behr has not identified forced labour or child labour in its operations or supply chain.

Reporting Mechanisms

Behr utilizes Masco Corporation's Ethics Hotline (www.stand4ethics.com), where employees and suppliers can confidentially report concerns. The Hotline is administered by a third party and can be accessed 24 hours a day, seven days a week. Reports may be made anonymously where permitted by law.

Masco Corporation investigates all reported instances of non-compliance and takes appropriate action to help ensure that its policies, standards and applicable laws are observed.

Training

Education and training are critical components to ensuring that our standards are met and that human rights within our supply chain are respected. Salaried employees, including those with responsibility for supply chain, are required to certify annually their compliance with the Code of Ethics and complete on-line training. Additionally, employees and managers with responsibility for supply chain management are periodically trained with respect to the applicable requirements of, and compliance with, the SBP Policy, including with respect to forced labour and child labour.

Assessing the Effectiveness of Our Actions

To assess the effectiveness of our policies and procedures in place to ensure that forced labour and child labour are not being used in our supply chain, Behr reviews the results of audits performed, the implementation of any required corrective action plans and the number and type of complaints received through the Ethics Hotline and other internal reporting mechanisms.

In addition, in 2024 Masco Corporation is partnering with an external organization to conduct an independent review of the SBP Policy.

Approval and Attestation

Solely for purposes of compliance with the Canada Act, this statement was approved pursuant to subparagraph 11(4)(b)(i) of the Canada Act by the Board of Directors of Behr.

In accordance with the requirements of the Canada Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this statement for Behr. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this statement is true, accurate and complete in all material respects for the purposes of the Canada Act, for the reporting year listed above.

Megan Selby
President of Behr Process LLC
Director of Behr Process Canada, Ltd.

I have the authority to bind Behr.

/s/ Megan Selby

May 31, 2024