



## **Fighting Against Forced Labor and Child Labor in Supply Chains Act**

### **Introduction**

In compliance with the regulations of Canada's *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (the "Act"), which requires companies, including Benjamin Moore, to disclose the efforts taken to prevent and mitigate forced and child labor in their supply chains, below are the actions Benjamin Moore took to prevent forced and child labor throughout our organization and global supply chain during 2025.

Benjamin Moore is committed to conducting business in an ethical and responsible manner that supports and respects the mission of protecting human rights. We will pursue to partner with suppliers who share our commitment. We are also dedicated to continuously monitoring and improving the effectiveness of our prevention efforts and incorporating enhancements to our operations that further prevent any use of forced or child labor.

### **Steps to Prevent and Reduce Risk**

From an internal perspective, Benjamin Moore's Human Resources department has screening questions in place during the hiring process to ensure that we do not accept underage candidates. New hires are also required to provide supporting documentation during the background check process. Their date of birth and identification, including their Right to Work in Canada, are validated using a third-party verification company.

Within our supply chain, any third-party vendors that we contract with are provided with the Berkshire Hathaway's Code of Ethics and Prohibited Business Practices, developed by Benjamin Moore's parent company, Berkshire Hathaway Inc. vendors are required to attest to their understanding of these practices and agree they must abide by these policies, or by their own equally rigorous policies. In addition, each year we conduct anywhere between eight and fifteen "supplier audits" on our manufacturing vendors. One section of the audit is dedicated specifically to assessing and preventing the use of Forced and Child Labor. Our suppliers must verify that they do not hire any personnel under the age of sixteen. In addition, if the supplier was part of a Social Compliance audit by an outside agency or company, we request the most recent year's audit findings for inspection.

### **Structure, Activities, and Supply Chains**

Benjamin Moore is one of North America's leading manufacturers of premium quality residential, commercial, and industrial maintenance coatings, with our corporate headquarters residing in Montvale, New Jersey. Our products are available at more than 9,200 locally owned and operated paint, decorating, and hardware retailers throughout the United States, Canada, and United Kingdom as well as through distribution channels in sixty-seven countries globally. We own and operate five manufacturing facilities within the United States, as well as nineteen distribution centers throughout the United States, Canada, and United Kingdom.

Our supply chain consists of vendors from all over the world that provide us with raw materials used within the manufacturing process of our paints and coatings. Onboarding and procurement management of our vendors takes place at our corporate headquarters in Montvale, New Jersey. Once a vendor is onboarded, specific contracts are set in place to provide raw materials to one or more of our manufacturing sites.

### **Policies and Due Diligence**

Benjamin Moore has a zero-tolerance policy around forced and child labor. We take many steps to assess and manage the risk of forced and child labor directly within the Company as well as within our supply chain. Internally, the steps begin with the hiring process. Through initial screening questions at the time of application, the age of the individual is verified. As the individual progresses through the interview process and a position is offered to them, a background check is performed. This background check is completed by confirming the individual's social security number if they are a citizen of the United States or the individual's social insurance number if they are a Canadian citizen, as well as inspecting a valid form of identification. This will confirm the age of the individual. The background check is verified through a third-party provider.

Our general practice when onboarding a raw material vendor, we visit their facility to conduct formal interviews with appropriate individuals at the site. As part of this visit, we typically tour the facility for inspection. Depending on the volume of product we plan to purchase from the vendor, we also conduct an initial supplier audit. All of our global vendors (outside of the United States) are required to comply with the guidelines of the U.S. Foreign Corrupt Practices Act of 1977. This requires us to investigate each global vendor using a third-party software tool. With this tool, we are able to run searches on any company to determine if there are any instances in which a current or prospective vendor may have been flagged for illegal or unsafe practices that violate any specific regulations.

### **Areas of Business and Supply Chains That Carry Risk and Steps to Assess and Manage Those Risks**

As Benjamin Moore is part of the manufacturing industry, the potential risk of forced and child labor is heightened. Much of that risk resides within our manufacturing facilities and distribution centers, along with our use of vendors within our supply chain that provide us with raw materials.

As previously mentioned in detail, there are many steps taken to assess and manage the risk of forced and child labor directly within the Company as well as within our supply chain. Examples cited above include our hiring process (initial screening, age verification, background checks and identification validation) and procedures for onboarding vendors (vendor facility site inspections, interviews, supplier audits, a third-party software investigation for global vendors, and review of external agency's social compliance audits).

### **Measures Taken to Remediate Risk**

We have not encountered any forced or child labor directly within our business or indirectly through our supply chain, therefore no remediation measures have been taken. If we were to encounter this prohibited practice internally or externally, we would immediately remove ourselves from the individual(s) or corporation(s) responsible.

**Measures Taken to Remediate the Loss of Income to Impacted Families**

As we have not encountered any forced or child labor directly through the company or indirectly within our supply chain, we have not needed to take any measures regarding the loss of income to impacted parties.

**Training**

While we do not have any formal training regarding forced and child labor, every employee is required to review the Berkshire Code of Ethics and Prohibited Business Practices Policy on an annual basis. After reading through the policies, each employee is required to certify that they understand the conditions stated within these documents. We also require all procurers of international vendors and distributors to take FCPA training.

**Assess Effectiveness**

Internally, the hiring process undergoes many levels of interviews and review before an individual is officially hired within the Company. This is in addition to third-party confirmation of employee verification during the background check.

As described above in relation to our supply chain, we assess the effectiveness of our efforts to prevent the use of forced and child labor by conducting annual audits. Through certification that forced and child labor are not being used as well as site visits and research through a third-party software provider, we have reasonable assurance that our vendors are not using forced or child labor. If we were to encounter this prohibited practice whether internally or externally, we would immediately terminate our relationship with the individual(s) or corporation(s) responsible.

**Approval and Attestation**

In accordance with the requirements of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Chairman and CEO, 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.

 \_\_\_\_\_

Dan Calkins  
Chairman and CEO  
Date

I have the authority to bind Benjamin Moore and Co.