



C.H.I. Overhead Doors LLC

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Annual Compliance Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act

C.H.I. Overhead Doors, LLC (“C.H.I.”), BN 792925547RM0001, a Nucor company has prepared this single entity report which covers the fiscal period from January 1, 2023 to December 31, 2023. In this report, we will share the comprehensive measures we have implemented to identify, assess, and mitigate the risk of forced labour in our supply chain.

It is with great pride and a deep sense of responsibility that we present this report detailing our commitment and efforts to prevent forced labour within our supply chain. At C.H.I. we recognize the gravity of the global challenge posed by forced labour and its impact on human rights. We value our teammates and business partners and strive to treat everyone who works with us with dignity and respect. Thank you for your interest in our commitment to preventing forced labour, and we look forward to your engagement and support in this critical endeavor.

C.H.I. recognizes the importance of examining every stage of the life of our products, therefore, we have taken the following steps in the previous financial period to prevent and reduce the risk of forced labour or child labour:

- Transition of the Nucor Supplier Code of Conduct (CoC) to our supply chain program. This Code of Conduct establishes clear expectations and obligations for suppliers related to environmental, business ethics, harassment, discrimination, health and safety, human rights, forced labour and child labour practices.
- Adoption of Nucor’s Standards of Business Conduct and Ethics Policy, Forced Labour Policy, and Human Rights Policy
- Introduction of a Whistleblower program



Our Company

C.H.I. Overhead Doors have been crafting high-quality garage doors for homes and businesses since 1981. C.H.I. was built on the idea that garage doors should be exceptional in quality, craftsmanship, and value.

From the beginning, C.H.I. set out to be a different kind of garage door company. One that not only builds garage doors, but that also celebrates heritage, tradition, and values. To this day, that promise still stands. As the premier garage door manufacturer, we continue to grow with a dedicated purpose - to provide our customers with the very best in garage doors and service.

Acquired in June 2022, C.H.I. Overhead Doors, LLC is now a division of Nucor Corporation. C.H.I. operates two manufacturing facilities and five distribution centers throughout the United States. C.H.I. has two employees in Canada and 898 in the US.

C.H.I. sources raw steel and the main components of our garage doors within the United States and acts as the non-resident importer of record of the finished doors and parts for our customers in Canada.

Our Supply Chain ESG Management

C.H.I. has a long history of conducting its business in a manner consistent with high standards of social responsibility and it is essential for us to do business with suppliers that share our commitment to strong social, environmental, and economic performance.

Our Supplier Code of Conduct outlines the principles and values which reflect C.H.I.'s ongoing commitment to social responsibility and human dignity. Our suppliers are expected to acknowledge and adhere to these principles in all dealings on behalf of C.H.I.

a) Suppliers must not utilize involuntary labor of any type. This shall include, but not be limited to, forced, indentured, bonded or prison labor.

b) Suppliers must not utilize child labor. For purposes of the Code, a "child" will be considered any person younger than (i) fourteen (14) years old; (ii) the minimum age for completing compulsory education in the country of manufacture; or (iii) the minimum age for employment in such country, whichever is the highest.

c) Suppliers must treat each of their employees with respect and dignity. As such, Suppliers shall not subject any employee to physical, sexual, verbal or other forms of harassment, coercion or abuse.

d) Suppliers shall not subject any employees or applicants for employment to unlawful discrimination.

e) Suppliers must pay each of their employees at least the minimum wage, and supply the minimum benefits required by applicable local laws. In the absence of applicable local laws, Suppliers shall provide minimum wages and benefits consistent with industry practice in such location.

f) Suppliers shall comply with all applicable health, safety and welfare laws, rules and regulations, and shall provide a safe working place for their employees. Suppliers must have and implement effective programs to promote the foregoing.

Suppliers must maintain documentation reasonably necessary to evidence compliance with the Supplier Code of Conduct. Such documentation must be made available to C.H.I. upon reasonable advance written request. Failure to comply with this Code may subject a supplier to possible termination of its business relationship with C.H.I.

This Code also includes conflict minerals reporting rules and requirements. We expect appropriate due diligence measures be taken to help identify the sources of these minerals, to the smelter level and to support global effort to eradicate the use of conflict minerals that directly or indirectly finance or benefit the armed conflict and social human injustice in any “Covered Country” as identified by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Our policies and due diligence

C.H.I. embeds responsible business conduct with consideration to human rights into its policies, governance, and decision-making, illustrated but not limited to these key governance programs:

- *Standards of Business Conduct and Ethics Policy*
- *Inclusion, Equity and Diversity Policy*
- *Eliminating Forced Labour Policy*
- *Combating Trafficking in Persons Policy*
- *Human Rights Policy*

Protecting Human Rights

Our Human Rights Policy (“Policy”) articulates our commitment and responsibility to respect all human rights consistent with the core principles of the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

This Policy applies to all employees. In addition, our contractors, subcontractors, suppliers, or other business partners are expected to comply with this Policy. We communicate and reinforce the importance of respecting human rights through our vetting process of contractors, subcontractors, suppliers and other business partners and through our contract provisions entered into with third parties.

In the event our Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with our higher standards. In situations where local law is less stringent than generally recognized international human rights standards, we operate in accordance with the more stringent standard and its related policies and guidelines.

Compliance with this Policy, and our other business practices and policies, demonstrates our commitment to eliminate human rights violations throughout our supply chain and we encourage contacting us to report any known or suspected violations.

Reporting and non-retaliation

C.H.I. has a whistleblower hotline available to all employees where ethics matters, or other violations of the law can be reported. We use a third party to manage our hotline program. It is available at all times and in multiple languages. Information on the whistleblower hotline is posted on our internal system that all employees can access. All calls with sufficient information are investigated. We strictly prohibit and consider it a violation of our policies if anyone retaliates against any employee for reporting.

Remediation

During the previous financial reporting period, C.H.I. did not identify any instance of forced labour or child labour in our supply chain or any instances where vulnerable families lost income because of measures we had taken to eliminate the use of forced labour or child labour in our supply chain. If instances of forced labour or child labour arise within our activities or supply chain, C.H.I. commits to taking remedial action.

Training

To raise awareness among our employees, C.H.I. conducted mandatory training and onboarding modules on various social sustainability topics including business ethics and harassment. These modules are on the corporate SharePoint site and must be completed annually by all employees. In 2023, the training modules did not specifically include forced labour and child labour however C.H.I. understands the importance and will work to build this into our training program in future.

Effectiveness Assessment

C.H.I. has in place many measures to prevent and reduce the risks of forced labour or child labour. We will continue to work to assess the effectiveness of those actions to eradicate these activities within our supply chain.

At C.H.I. Overhead Doors, LLC, we remain steadfast in our commitment to ethical sourcing and supply chain integrity. While we are proud of the strides we have made, we acknowledge that eradicating forced labour requires sustained vigilance and collaboration across industries and borders.

Attestation

In accordance with the requirements of the 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 Act, for the reporting year listed above.

Full name: *Tisha L Pfeiffer*
Title: *Chief Financial Officer*
Date: *5/30/24*
Signature: *Tisha L Pfeiffer*
I have the authority to bind C.H.I. Overhead Doors, LLC'.