

Canadian Statement Against Forced Labour and Child Labour in Supply Chains
pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in
Supply Chains Act and to amend the Customs Tariff,
referred to as Canada's "*Modern Slavery Act*" (the "**Act**")
for the year ending 2023

1. INTRODUCTION

This is a statement made by Chamberlain Group Canada Company regarding the Act, as referenced above.

2. REPORTING ENTITY

Chamberlain Group Canada Company ("Chamberlain CAN")

3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Chamberlain CAN is a corporation engaged in selling and distributing goods in Canada and conducting intercompany cross-border transfers of inventory. The company imports goods produced outside Canada into Canada. Our supply chains are rigorously monitored and assessed for risks of forced labour, with comprehensive policies and procedures in place to mitigate these risks. The company is certified for The Partners in Protection (PIP) program administered by the Canada Border Services Agency (CBSA), which requires implementing robust security measures across supply chains including measures to prevent exploitation and unethical labour practices.

4. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

The company has updated its Code of Conduct to address forced labour and implements comprehensive policies and due diligence processes. This includes supplier assessments, vulnerability assessments, and action plans. We track performance indicators and conduct regular reviews and audits to ensure compliance with forced labour regulations. The company also requires in its Product Supply Agreement (the "Supply Agreement") that suppliers and each subcontractor employ only workers who meet the legal minimum working age, but in no event less than fourteen (14) years of age. For jobs that require greater maturity or pose a higher safety risk, these workers shall be eighteen (18) years of age or older. Suppliers and each subcontractor must have legitimate substantiation of the date of birth of each worker. This minimum working age requirement is applicable to all work, whether performed in part or in whole at home or in cottage industries.

The company participates in international programs and standards, such as the Customs Trade Partnership Against Terrorism (CTPAT) in the United States, which includes explicit guidelines on

forced labour. As part of its due diligence, the company performs regular risk assessments to identify vulnerabilities in the supply chain, including risks related to forced labour. Additionally, the company provides training programs that include components on recognizing and preventing forced labour, thereby raising awareness among employees and partners.

While the Partners in Protection (PIP) program does not specifically mandate measures against forced labour, it indirectly supports efforts to combat such practices. PIP requires members to comply with applicable laws, including labour rights and human rights laws. The program's security and ethical requirements help prevent exploitation and unethical labour practices by ensuring better oversight and control within the supply chain. This compliance framework supports the company's broader efforts to eliminate forced labour and uphold human rights.

5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

The company has identified risks in wholesale trade, retail trade, and transportation and warehousing. We conduct vulnerability assessments and threat assessments, map cargo flow, and identify partners and processes. Action plans are prepared and followed up on to mitigate any identified risks. The risk assessment process includes:

- Process Mapping: Identifying the weakest points in the supply chain and selecting suppliers and business partners.
- Threat Assessment: Evaluating threat risk factors, assigning risk ratings, and identifying activities.
- Vulnerability Assessment: Measuring threats based on U.S. CBP recommendations and UFLPA Region Alert Information.
- Action Plan Preparation and Follow-Up: Mitigating identified risks with timely corrective actions.
- Documenting the Risk Assessment Process: Detailing policies and procedures according to ISO/IEC 31010:2009 standards.

6. MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

The company did not find any instances of forced labour and/or child labour in its supply chains during the reporting period. Therefore, no remediation actions were necessary. However, the company has robust policies and procedures in place to address such issues if they arise in the future. These include detailed protocols for investigation, support for affected individuals, and measures to prevent recurrence.

7. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR

The company did not find any instances of forced labour and/or child labour in its supply chains during the reporting period. Therefore, no remediation actions were necessary. However, the company has robust policies and procedures in place to address such issues if

they arise in the future. These include detailed protocols for investigation, support for affected individuals, and measures to prevent recurrence.

8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

The company conducts annual Forced Labour Training and tests online. This training is mandatory for all employees and covers the identification, prevention, and reporting of forced labour and child labour.

9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

The company assesses its effectiveness through regular audits and reviews, tracking performance indicators, and partnering with external organizations for independent audits. We work closely with suppliers to measure and improve their compliance with anti-forced labour and child labour policies.

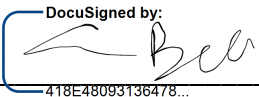
ATTESTATION

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. For clarity, I am providing this attestation in my capacity as a director and officer of Chamberlain Group Canada Company, and not in my personal capacity.

Susan E. Bell

Executive Vice President, General Counsel and Secretary

May 30, 2024

Signature: _____

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I, Susan E. Bell, have the authority to bind Chamberlain Group Canada Company