

Report on the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

June 2024 Revision

Pursuant to subsection 11(2) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C., 2023, c. 9 (the "Act"), this revised joint report amends the report made and filed May 31 2024 by Creative Door Services Ltd., headquartered in Edmonton, Alberta, and in the event it is legally required, adds its foreign parent company, Overhead Door Corporation, as a joint reporting entity. Additionally, the report is revised to simplify and rearrange the information being reported.

It is not clear from published guidelines whether Overhead Door Corporation is a required reporting entity. Overhead Door Corporation, a State of Indiana USA corporation, with its headquarters located in Lewisville, Texas USA, is not listed on a Canadian stock exchange; does not have a place of business in Canada, does not itself do business in Canada, and does not itself have assets in Canada other than its ownership interest in its wholly owned subsidiaries in Canada, of which Creative Door Services Ltd. is the only reporting entity.

As required by the Act, this revised joint report presents the forced labour and child labour reporting statement for the financial year ending December 31, 2023 for Creative Door Services Ltd. and its foreign parent company, Overhead Door Corporation. It summarizes the actions taken to prevent and reduce the risk that forced labour and child labour is used at any step of the production of imported goods into Canada by Creative Door Services Ltd. and Overhead Door Corporation.

Where this report refers to "Creative Door Services Ltd." and/or "Overhead Door Corporation," the "Company," "we," "us" or "our," it is a reference to such reporting entity or entities.

Structure, Operations and Supply Chain

As of December 31, 2023, Creative Door Services Ltd. had approximately 270 employees and Overhead Door Corporation, including its subsidiaries as a consolidated organization, had approximately 4,086 employees. The number of employees working on the various sites can vary depending on seasonality and client demand. The head office and senior executive team for Creative Door Services Ltd. are in Edmonton, Alberta. The head office and senior executive team for Overhead Door Corporation are in Lewisville, Texas, USA.

From garage doors and openers to comprehensive planned maintenance, repair services, and parts, the Company is a proud leader in residential garage door and commercial and industrial door products and services in Canada. Our products and services can be broadly grouped into three categories: supply, installation, and maintenance in the residential and commercial buildings.

Our procurement activities in Canada are comprised approximately 50% from Canadian suppliers and 50% from U.S. suppliers. Additionally, some of the suppliers may supply products or components that originate from international locations.

Policies and Due Diligence Practices

We have implemented policies and practices aimed at supporting ethical and responsible business practices, and we require all team members to act in accordance with such policies.

The Company is responsible for monitoring compliance with our policies. Upon accepting a position with the Company, all team members are required to provide an acknowledgement of their commitment to comply with the Company's policies.

Whistleblower Policy

The Whistleblower Policy provides a mechanism for team members with serious concerns about any aspect of the Company's operations to come forward and voice those concerns on a confidential and, if desired, anonymous basis. This policy makes it clear that we expect all team members to act responsibly to uphold the reputation of the organization and maintain public confidence and team members can report such matters without fear of discrimination, harassment, or persecution. The Whistleblower Policy applies to all team members in all jurisdictions in which we operate.

Minimum Age Policy

The Minimum Age Policy applies to all team members of the Company and supports our commitment to a safe workplace and enforces an age restriction in accordance with the applicable provincial Employment Standards and Human Rights legislation. A person under the age of 18 may only be employed to do work at a Company facility or site if the individual is:

- (a) a participant of an industry recognized work experience program;
- (b) a summer student and is working in an office environment;
- (c) engaged in office work; or
- (d) engaged as a laborer or apprentice in a company shop facility or yard, and in accordance with all applicable provincial employment standards legislation.

We are committed to providing access to effective reporting mechanisms related to concerns arising from compliance with our policies. This is substantiated through our Whistleblower Policy.

We are satisfied that, because of recruitment, remuneration and compliance measures throughout our operations, there is minimal risk that any of our team members are at risk of modern slavery.

We continue to be guided by our policies and principles in our relationships with our partners, including working with reputable companies, who are required to comply with domestic and international laws.

Business Ethics and Code of Conduct Policy

The Company has adopted a Business Ethics and Code of Conduct Policy (the "Code") that applies to all team members in all jurisdictions in which we operate and governs our relationship with customers and suppliers.

The principles of the Code encourage and promote a culture of ethical business conduct by establishing standards of conduct by which each covered party must abide. Each covered party has a responsibility to: avoid apparent or actual conflicts of interest; avoid actions or behaviors that could create an uncomfortable or hostile work environment; protect the Company's assets; ensure confidential information remains confidential; and report violations of the Code of which such covered party becomes aware. Upon accepting a position with the Company, all team members, are required to provide an acknowledgement of their commitment to comply with the Code. In addition, each team member is required to acknowledge their compliance with the Code on an annual basis.

Risk of Forced Labour and Child Labour in Our Supply Chain and Steps to Prevent and Reduce that Risk

We are committed to the health and safety of our employees and conduct our operations in compliance with applicable laws and regulations. Like with many global businesses, some suppliers may supply products or components that originate from international locations, and risk in our supply chain may arise due to our limited visibility into our suppliers' upstream supply chains. We are committed to conducting a review of our policies and procedures as they relate to risks and responsibilities associated with forced labour and child labour in our supply chains. Listed below is a summary of the actions taken in the 2023 financial year to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

We maintain a Procurement Policy to continue ethical procurement principles as part of our regular business practice and supplier selection including procurement outside of Canada, and all subcontracted labour sourced from Canadian companies in alignment with the laws and regulations of Canada.

We have reviewed and communicated our Whistleblower Policy whereby team members and suppliers have an avenue to share complaints in a confidential and anonymous manner. The platform is administered by a third-party provider and matters are investigated by internal representatives to ensure compliance with policy and legislation.

We have reviewed our Minimum Age Policy, which is in place to ensure all employees are above the age of 18 in accordance with our policy.

On an annual basis, team members are required to sign or provide electronic acknowledgement of our key policies, including but not limited to, the Business Ethics and Code of Conduct Policy, the Whistleblower Policy, and the Workplace Harassment Policy.

The Company is committed to preventing and reducing the risk of forced labour and child labour. Through gathering data and analysis, we will identify any areas of the supply chain where further risk mitigation may be required.

We engage our suppliers through our corporate services team in both supply chain and estimating, as well as through our operations teams. Through prequalification verifications and requirements set for approval of suppliers, we strive to build relationships with suppliers who align with our values. We collaborate with direct suppliers who operate legally, ethically, and responsibly, using prequalification criteria to assess that they are aligned with our safety and quality requirements, and to protect us from potential legal and reputational risks. Our prequalification assessment includes health, safety, environmental, technical compliance, financial considerations, and sustainability requirements.

Training

We provide annual training on our Code of Business Conduct and Ethics for our team members to electronically acknowledge that they have read and understood the Code of Conduct, and to reiterate what is expected of them in the performance of their duties.

Measures Taken to Remediate any Forced Labour or Child Labour and Assessment of Risk

As of the date of this report, the Company has not identified any known instances of forced labour or child labour in its operations or supply chain. As a result, it has not had to take any measures to remediate any forced labour or child labour and has identified its risk as minimal.

Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families that Results from any Measure Taken to Eliminate the Use of Forced Labour or Child Labour in its Activities and Supply Chains

As of the date of this report, there have been no identified, known or reported instances of forced labour or child labour in the Company's operations and supply chain. As a result, we are not aware of any such loss of income.

Effectiveness in Ensuring that Forced Labour and Child Labour are Not Being Used in the Company's Business and Supply Chains

As the Company continues the development of its program to prevent and reduce the risks of child and forced labour in its supply chains and operations in 2024, we will consider and implement measures to assess the effectiveness of these processes.

Approval and Attestation

This report was approved by the Board of Directors of Creative Door Services Ltd. and by the Board of Directors of Overhead Door Corporation.

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report. 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 2023. I have the authority to bind Creative Door Services Ltd. and Overhead Door Corporation.

Date: June 12, 2024



John Wilson
Executive VP and CFO
Member, Board of Directors
Overhead Door Corporation