

Raynor Canada Holdings Corp. and Raynor Canada Corp.

2023 Modern Slavery Report

1 Introductory section

- 1.1 This report (“**Report**”) constitutes the first report prepared by Raynor Canada Holdings Corp. (the “**Canada Holdco**”) and Raynor Canada Corp. operating as Richards-Wilcox Canada (“**R-W Canada**”) (together, “**Raynor**”, “**our**”, “**us**” or “**we**”) pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).
- 1.2 This Report relates to the financial year ended December 21, 2023 (“**Reporting Period**”).

2 Steps taken to prevent and reduce the risks of forced labour and child labour

- 2.1 In general terms, the steps we have taken during the Reporting Period to prevent and reduce the risks of forced labour and child labour in our operations and supply chains including implementing our internal human resources processes to help ensure that our employees are of legal age to work in their jurisdiction and have been recruited voluntarily and providing training to our employees on workplace health and safety matters and on understanding human rights.

3 Structure, activities, and supply chains

Structure

- 3.1 Canada Holdco is an indirect subsidiary of Raynor Worldwide, Inc., which was originally founded in 1944 and is headquartered in Dixon, Illinois. R-W Canada was incorporated in 1912, and is a wholly-owned direct Nova Scotia subsidiary of Canada Holdco. R-W Canada exists under the corporate laws of Nova Scotia and has operations in Ontario.
- 3.2 Canada Holdco does not directly employ any individuals within or outside of Canada. R-W Canada employs approximately 180 employees, some of whom are provided fixed annual salaries and others who are paid wages on an hourly basis. The majority of these employees are located in Mississauga, Ontario, with a few located in Alberta and Québec.

Activities

- 3.3 R-W Canada primarily manufactures overhead garage doors for residential and commercial use, along with the major hardware components. R-W Canada’s own manufacturing facilities are located in Mississauga, Ontario.
- 3.4 Its manufactured products are then sold through dealers in Canada and the United States, and it

also exports its products to dealers located internationally and exports other products, such as garage door panels, door faces and hardware components, to its US affiliate, Raynor Manufacturing Company. Canada Holdco operates as a holding company and has limited operational activities.

Supply chains

- 3.5 R-W Canada is currently in the beginning stages of gathering information about its key direct materials suppliers. R-W Canada sources materials from suppliers located in Canada, as well as imports materials into Canada from suppliers located internationally, including North America, Europe, Africa and Asia.
- 3.6 The primary categories of goods imported by R-W Canada into Canada include raw materials (including steel wholesale), machined parts, door systems and chemicals. The majority of the materials imported by R-W Canada into Canada are sourced from direct suppliers operating in the United States. R-W Canada also sources products directly from its US affiliate Raynor Manufacturing Company for import into Canada, including products such as garage door faces and hardware components. Canada Holdco does not directly engage any suppliers in the ordinary course.

4 Policies and due diligence processes

Policies

- 4.1 With respect to our operations, R-W Canada has in place certain policies and procedures as required by applicable law in order to help protect and promote a safe workplace for our employees, including policies related to health and safety, accessibility, workplace violence prevention and workplace harassment prevention.

Due diligence processes

- 4.2 Respecting the dignity and human rights of our employees is important to us, and our employment and hiring practices comply with applicable laws related to labour, employment and human rights. As part of the typical onboarding process, legal working age is confirmed, certain background checks are conducted and reference checks are completed. Monthly safety inspections are also performed by the members of R-W Canada's safety committee.

5 Forced labour and child labour risks in our business operations and supply chains

Forced labour and child labour risks in our business operations

- 5.1 Given that the majority of our business operations are conducted in Canada and the United

States, and because all of R-W Canada's employees are located in Canada, we consider the risk of forced labour and child labour occurring within our business operations to be relatively low. However, we acknowledge that no sector or industry involved in the production or importation of goods is assumed to be entirely free from forced labour and child labour risks.

Forced labour and child labour risks in our supply chains¹

- 5.2 While we are still in the early stages of mapping our direct supply chains, R-W Canada does have a global supply chain, and we acknowledge that no sectors or industries involved in the importation or production of goods are assumed to be entirely free of child labour and forced labour risks.
- 5.3 We also recognize that our sourcing goods from suppliers located in certain regions within the continents of Africa, Asia and South America may carry a higher risk of forced labour or child labour, and that industries involved in the production of raw materials may also be linked with higher risks. Higher risks of forced labour and child labour may also exist with respect to our indirect suppliers, including those located in higher-risk jurisdictions and/or servicing higher-risk industries.

6 Steps taken to assess and manage forced labour and child labour risks²

Actions with respect to our business operations and supply chains

- 6.1 As mentioned above in the section on our due diligence processes, R-W Canada's standard hiring process involves internal checks to confirm that all new employees hold valid proof of identification and that they are of legal age to work in the jurisdiction in which they are located. At present, R-W Canada is still in the early stages of initiating the mapping process of its direct suppliers.

7 Remediation measures

- 7.1 There is nothing to report with respect to measures taken during the Reporting Period to remediate (i) instances of any forced labour or child labour, or (ii) the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour or child labour in our activities and supply chains.

8 Training

- 8.1 While such training does not engage directly with issues of forced labour or child labour, R-W Canada employees receive training on workplace health and safety and on understanding human rights. Canada Holdco did not engage any employees during the Reporting Period.

¹ Canada Holdco does not directly engage any suppliers.

² As it operates as a holding company, there is nothing to report with respect to steps taken to assess and manage forced labour and child labour risks in the business operations or supply chains of Canada Holdco.

9 Assessing the effectiveness of our actions

- 9.1 There is nothing to report with respect to actions taken to assess the effectiveness of Raynor in preventing and reducing risks of forced labour and child labour in their activities and supply chains in the Reporting Period.

10 Approval

- 10.1 This Report was approved by the board of directors of Canada Holdco as the joint report of Canada Holdco and R-W Canada for the financial year ended December 31, 2023 pursuant to subparagraph 11(4)(b)(ii) of the Act.
- 10.2 In accordance with the requirements of the Act, and in particular section 11 thereof, I attest for and on behalf of the board of directors of Canada Holdco that I have reviewed the information contained in the Report for the entities listed above. Based on the knowledge of the board of directors of Canada Holdco, and having exercised reasonable diligence, I attest for and on behalf of the board of directors of Canada Holdco 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.

Name: Michael E. Setchell

Title: Director of Raynor Canada Holdings Corp.

Date: May 29, 2024

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(Signature)

I have authority to bind Raynor Canada Holdings Corp.