



Annual Compliance Report on Forced Labor and Child Labor in Supply Chains

Based upon the requirements of Canadian Legislative Bill S-211 for the most recently completed financial year _____ 4-30-24 _____.

ORIGINAL REPORT

May 31st, 2024

CentiMark Corporation
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Canonsburg, PA
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USA

<https://www.centimark.com/>

It is with a deep sense of responsibility and with great pride that we present this report detailing our commitment and efforts to prevent forced labor within our supply chain. At **Centimark Corporation** we recognize the seriousness of the challenge posed by forced labor and its impact on social governance, responsible enterprise and human rights. Our commitment to ethical business practices extends beyond mere compliance.

In this report, we will share measures we have implemented to identify, assess, and mitigate the risk of forced labor and child labor in our supply chain. By embracing transparency, accountability, and collaboration, we aim to set a standard for responsible business conduct that goes beyond compliance. Our journey towards eradicating ways of conducting business not aligned with ethical practices and responsible processes is not just a corporate obligation but a moral imperative that we embrace.

As you delve into the pages of this report, we invite you to join us on this journey of continuous improvement and ethical leadership. Together, we can create a supply chain ecosystem that stands as a beacon of fairness, dignity, and respect for all. Thank you for your interest in our commitment to preventing forced labor and child labor.

Report Overview

This is a **single entity report** to align with requirements of the Canadian S-211 Forced Labor and Child Labor reporting initiative.

Centimark Corporation acts as the Non-Resident Importer of Record for shipments into Canada using business number _____ BN 89331 4849 RC0001 _____.

This report encompasses activities of Centimark Corporation for the most recent financial year beginning on _____ 5-1-23 _____ and ending on _____ 4-30-24 _____.

Centimark has identified that it aligns with at least two of the three criteria noted within the S-211 legislation in at least one of its two most recent completed financial years and is responsible to initiate the report for this Canadian regulation and initiative.

Section 1

The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity

Within the Centimark internal Business Code of Conduct policy the following statement is noted "Centimark adheres to all laws regarding child and forced labor, within the areas where we operate. Centimark does not tolerate any human rights abuses against any stakeholders, including external stakeholders, within our operation."

Centimark has a Supplier Code of Conduct, dated September 6, 2023, policy number POL – ESG101- The purpose of this policy is as follows:

- "Centimark's supplier Code of Conduct serves as a foundational path to the expectations we have for our vendors. For our company to continue its reputation as a reliable roofing and flooring contractor, we work to endure that our business activities, across our operations, are completed in a responsible manner. Maintaining adherence to the strongest ethical standards is one of the keys to Centimark's success, and we expect our suppliers to share our commitments to these values.

Section 2

Structure, Activities, and Supply Chain

Corporate Summary

Centimark Corporation is a corporation registered in _____ Delaware _____ under the applicable laws of the State jurisdiction and the United States of America.

The corporate headquarters is located in Canonsburg, Pennsylvania (Pittsburgh, PA) with branches located across the United States and Canada.

<https://www.centimark.com/locations>

Corporation Organizational Structure

1. President & CEO
2. Executive Vice President
3. Senior Vice President and CFO
4. Executive Group Directors
5. Departments Vice Presidents
6. Regional Managers and Department Mangers

CentiMark is North America's largest commercial roofing contractor, with over 100 locations from coast to coast. We offer 24/7 emergency roof services, roof evaluations, roof repairs, preventative maintenance plans, snow removal, reroofing, new construction roofing. All materials are sourced within the US and Canada. Some of the roofing materials are shipped into Canada from the US but most of the material for Canada is sourced with local distribution supply houses in Canada.

Organizational Mandate

Our mission:

As a commercial and industrial roofing company is to keep our Customers buildings watertight, protect their properties and employees, all in concert with regular business operations.

Our values:

We take great pride in our people, dedication and professionalism that drives us to new levels of excellence in commercial and industrial roofing. By setting the highest standards in workmanship, material and safety, we deliver the best solutions for our customers' needs.

Professional Associations

- NRCA - National Roofing Contractors Association
- Western States Roofing Contractors Association
- MRCA - Midwest Roofing Contractors Association
- ISM Pittsburgh - Institute for Supply Management

We are a nationwide company with over 3,500 associates and over 100 roofing and flooring offices throughout the United States, Canada and Mexico. Each office has dedicated crews for the installation and service of all major commercial and industrial roof systems, which are highly trained and experienced with a focus on safety. Our workplace is your roof, so the safety of your employees and our crews is a top priority. Our company is employee-owned (ESOP) and we stand behind every job we do.

Centimark requires that all employees be classified and paid in a manner which complies with the laws of the areas in which we operate.

Section 3

Policies and due diligence processes in relation to forced labor and child labor

For our Company to continue its reputation as a reliable roofing and flooring contractor, we work to ensure that our business activities are completed in a responsible manner. Maintaining adherence to the strongest ethical standards is one of the keys to our success, and we always do our best to do the right thing in any situation.

As noted in Section 1 of this report, CentiMark adheres to all laws regarding child and forced labor, within the areas where we operate. CentiMark does not tolerate any human rights abuses against any stakeholders, including external stakeholders, within our operations.

Business Ethics

All business dealings should be conducted in accordance with the letter, spirit and intent of all laws. CentiMark associates must not engage in any illegal, dishonest or unethical conduct in the performance of their job duties.

We make this commitment because such behavior is morally and legally right and because CentiMark's business success depends on its reputation of integrity and on the trust of those with whom we deal.

For example, and without limitation, CentiMark prohibits the following acts by associates, which may result in discipline, up to and including termination:

- Associate theft, fraud, embezzlement or misappropriation of any form of property belonging to the company.
- Any act of fraud or deception involving the company, a customer, a supplier or any other party.
- Fraudulent financial reporting including but not limited to intentional acts to misrepresent financial data.
- Any dishonest or unethical acts by an associate against the company.
- Lying or intentionally omitting or misrepresenting information.
- Making knowingly false or bad faith complaints, or lying or intentionally omitting or misrepresenting information during a CentiMark investigation.
- Illegal political contributions involving the Company, Company property or Company funds. Conflict of interest situations involving employment, consulting or other business relationships with customers or suppliers other than accepting gifts of a nominal nature.
- Violations of CentiMark's Confidentiality Policies and/or Confidential Information Agreements.

Section 4

The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

CentiMark's Supplier Code of Conduct serves as a foundational path to the expectations we have for our vendors. For our company to continue its reputation as a reliable roofing and flooring contractor, we work to ensure that our business activities, across our operations, are completed in a responsible manner. Maintaining adherence to the strongest ethical standards is one of the keys to CentiMark's success, and we expect our suppliers to share our commitments to these values.

We take great pride in the people, dedication and professionalism that drives us to new levels of success and excellence in roofing. By setting the highest standards in workmanship, materials and safety, we are able to deliver the best solutions for all of our customer's needs. Our commitment is not only to our customers, but to our communities as well.

This policy also defines various forms of harassment and unacceptable behavior and outlines the parties responsible for reporting, investigating and responding to any reports of violations.

The CentiMark Supplier Code of Conduct sets out the expectations for all of our Suppliers. This applies to any business, company or other entity that provides, or seeks to provide, any kind of good or service to any CentiMark company or division, and includes the entity's employees, directors, agents, subcontractors and other representatives.

CentiMark requires that all suppliers comply with all laws and regulations applicable to CentiMark, as well those relevant to all suppliers' operating locations.

- All business dealings should be conducted in accordance with the letter, spirit and intent of all laws.
- CentiMark suppliers must not engage in any illegal, dishonest or unethical conduct. This can include but may not be limited to: fraud, theft, corruption, misrepresentation of financial data, conflicts of interest, violations of workforce laws, unsafe work practices, illegal political contributions, corruption or any other inappropriate conduct.

CentiMark understands the importance of mitigating negative environmental impacts within our operations, and we expect our suppliers to share similar values.

- Suppliers must strive to align themselves with CentiMark's Environmental and Sustainability Policy throughout their everyday work and push themselves to reduce, report, and monitor their environmental impact.
- This also includes providing training or other materials to help educate their employees on environmental topics.

Section 5

Measures taken to remediate any forced labor or child labor

To date, our processes and procedures have not identified any aspects of forced or child labor within our supply chain.

During the selection and on-boarding process undertaken with each supplier, Centimark sends a comprehensive package outlining our commitments and standards to adhere to all regulations in every jurisdiction where we conduct business.

We demand legal compliance be adhered to by our suppliers.

Our suppliers warrant that all goods and services furnished shall comply with all applicable federal, state, and local laws, rules, regulations, and ordinances, including, but not limited to, the applicable provisions of the Fair Labor Standards Act of 1938, as amended. Sellers also warrant that all goods and services furnished hereunder comply with any current applicable federal and state Occupational Safety and Health Act(s) and rules. Any federal, state or local laws or regulations required to be included in a contract shall be deemed to be incorporated. Any Equal Employment Opportunity clause required to be included in a contract of this type shall be deemed to be incorporated.

Our suppliers are independent contractors and are all responsible for all acts and omissions of its employees, laborers, agents and subcontractors. Contractual commitments made with our suppliers shall be governed by and construed under the laws of the areas in which we operate.

Section 6

Any 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 labor or child labor in its activities and supply chains

To date, we have not identified any aspect of forced or child labor within our supply chain.

Our commitment is not only to our customers but also to our local communities. Philanthropy and volunteering are at the core of our company's culture. We are honored and grateful to work with many wonderful non-profits, including food banks, homeless shelters, educational and mentoring organizations and more, to help strengthen our local communities together.

The culture of giving back and volunteering has been ingrained in us for years. As our company continues to grow, we have more resources to help people. Giving back to the community has not shaped the CentiMark culture...it is the CentiMark culture.

Timothy M. Dunlap | CentiMark President & CEO

<https://www.centimark.com/about-us/corporate-responsibility/giving-back>

Section 7

The training provided to employees on forced labor and child labor

We provide each associate with our Business Code of Conduct policy document and forward our Supplier Code of Conduct policy document to each vendor that we on-board and begin a business relationship with.

Safety Training

- Ensuring high safety standards is a fundamental aspect of the commercial roofing industry. Every CentiMark office is fully committed to safeguarding the well-being of every associate, beginning

with comprehensive training and specific protocols. Did you know that all our service teams consist of a minimum of two individuals on each call? This not only enables quicker service completion but also significantly enhances the safety of our technicians while working on rooftops. Get a glimpse into the ongoing safety training conducted at our offices!

<https://www.centimark.com/about-us/team-centimark>

Section 8

How entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains

In our previous complete financial year, we have taken minimal to no action to assess our effectiveness in preventing and reducing the risks of forced labor and child labor in our activities and supply chains. However, as we continue our commitment to strive for excellence both in customer service, quality workmanship as well as ethical practices as a responsible enterprise, we continue to discuss and develop mechanisms of ensuring the effectiveness of our processes with focus on identifying practices that may utilize forced and child labor and how to eliminate such practices from our supply chain.

At **Centimark Corporation**, we will continue in our commitment to ethical sourcing and supply chain integrity. Through monitoring, supplier engagement, and continuous improvement initiatives, we continue to implement measures to help prevent forced labor from infiltrating our supply chain.

As detailed in this report, our efforts encompass supplier processes to ensure compliance with internationally recognized labor standards. Furthermore, we recognize the importance of transparency and accountability, which is why we are dedicated to combating forced labor.

While we are proud of the strides we have made, we acknowledge that eradicating forced labor requires sustained vigilance and collaboration across industries and borders. We remain committed to this cause and will continue to work tirelessly to uphold the dignity and rights of all workers throughout our supply chain.

ATTESTATION

This report has been reviewed and approved by the appropriate governing body of **Centimark Corporation**.

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.

Timothy M. Dunlap
President and CEO

Date: 5-31-24

Signature: _____

I have the authority to bind **Centimark Corporation**.