

Court File No. CL-26-00000330-000

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

BETWEEN:

BANK OF MONTREAL

Applicant

- and –

TRS COMPONENTS LTD., PLANT 22 LTD. and 976711 ONTARIO INC.

Respondents

APPLICATION UNDER SUBSECTION 243(1) OF THE *BANKRUPTCY AND INSOLVENCY ACT*, R.S.C. 1985, c. B-3, AS AMENDED AND SECTION 101 OF THE *COURTS OF JUSTICE ACT*, R.S.O. 1990, c. C.43, AS AMENDED

**AFFIDAVIT OF MELISSA MACRAE
(Affirmed July 30, 2026)**

I, MELISSA MACRAE, of Nanoose Bay, in the Province of British Columbia, AFFIRM:

1. I am the Chief Financial Officer of Atlas Engineered Products Ltd. (“Atlas”) and, as such, I have personal knowledge of the matters set out in this affidavit, except where I have stated that my knowledge is based on information and belief, in which case I believe that information to be true.

2. Atlas is a public company listed on the TSX Venture Exchange. It designs, manufactures, and sells engineered roof trusses, floor trusses, and wall panels, and supplies related engineered wood products, to residential, commercial, and agricultural builders. Atlas operates manufacturing and distribution facilities across Canada, including in British Columbia, Manitoba, Ontario, New Brunswick, and Saskatchewan, through its operating subsidiaries. Atlas operates in the same

industry as TRS Components Ltd. (“TRS”) and 976711 Ontario Inc. o/a Terra Nova Truss (“TNT”), which also manufacture roof trusses, floor systems, wall panels, and lumber packages for residential, commercial, and agricultural applications.

3. Atlas is, jointly with Whirl 2 Ltd., 2070400 Ontario Ltd., Jeff Young, and Chad Lambourn (collectively, the “Whirl Subordinators”), interested in submitting a bid for the business and assets of TRS, TNT and Plant 22 Ltd. in the proposed Sale Process, including by way of a bid that would credit bid some or all of the debt owed by TRS to the Whirl Subordinators.

4. The Whirl Subordinators are the former owners and operators of the predecessor to TRS. I understand from Ed Davis, the principal of Whirl 2 Ltd., and verily believe that the Whirl Subordinators sold that business and, in connection with that sale, provided vendor take-back financing to the purchaser (which was subsequently reorganized into TRS). The debt owed by TRS to the Whirl Subordinators is secured, but subordinated and postponed to the debt owed to Bank of Montreal pursuant to a postponement and subordination agreement dated July 25, 2022.

5. I understand that the current deadline for the submission of qualified bids in the Sale Process is 5:00 p.m. (Toronto time) on August 31, 2026 (the “Bid Deadline”). Atlas and the Whirl Subordinators do not yet have access to the data room established for the Sale Process. In order to assess and submit a bid, among other things:

- a. Atlas and the Whirl Subordinators must obtain access to the data room and conduct due diligence on the business and assets of TRS, TNT and Plant 22 Ltd.;
- b. Atlas must seek and obtain the approval of its board of directors for any bid; and
- c. Atlas must arrange firm financing for the bid.

6. Without access to the data room, it is difficult to assess whether Atlas and the Whirl Subordinators can complete these steps, and submit a bid, by the existing Bid Deadline. Atlas and the Whirl Subordinators are committed to moving as quickly as possible to pursue a bid. That said, in order to justify committing the resources needed to pursue a bid, including the time and cost of due diligence, seeking board approval, and arranging financing, it would help to have confirmation of an additional two weeks, to September 14, 2026, within which to submit a bid.

7. I make this affidavit in support of the Whirl Subordinators' and Atlas's request for an extension of the Bid Deadline to September 14, 2026, and for no other purpose.

AFFIRMED by Melissa MacRae in Nanoose Bay, in the Province of British Columbia, before me at the City of Toronto, in the Province of Ontario, on July 30, 2026 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

Nathaniel Read-Ellis

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Commissioner for Taking Affidavits
(or as may be)

Signed by:

Melissa Macrae

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Full Name

BANK OF MONTREAL .
Applicant

-and- TRS COMPONENTS LTD., et al.
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PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF MELISSA MACRAE
(Affirmed July 30, 2026)

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and Chad Lambourn