

Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C 2023, c 9 (the “Act”) – ANNUAL REPORT FOR THE 2023 FISCAL YEAR END

INTRODUCTION AND ORGANIZATION STRUCTURE

This report has been prepared by Mircom Technologies Ltd, a company duly incorporated in accordance with the laws of Ontario, and its subsidiaries (collectively referred to as “Mircom Group of Companies” or “Mircom”) for the financial reporting year ending on September 30, 2023.

Mircom is a global designer, manufacturer and distributor of life safety, fire protection, building communication, security, mass notification and smart home solutions. Mircom is committed to being a full solution provider and operates a dedicated network of sale and service branch offices worldwide, under the Mircom Engineered Systems brand. Our vision is to make buildings worldwide safer, smarter and more livable.

As a global industry leader and responsible corporate entity, Mircom is committed to upholding the obligations set forth by Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). Mircom recognizes the importance of eradicating forced labour and child labour practices from global supply chains and is dedicated to taking proactive measures to ensure that our operations are in material compliance with the Act.

OUR SUPPLY CHAIN – AN OVERVIEW

Our company's supply chain and operations are extensive and globally integrated.

Mircom operates two main production facilities in Canada located in Vaughan, Ontario and Montreal, Quebec, where we manufacture a wide range of products, relating to:

- Fire Detection & Alarm Systems
- Communication & Voice Entry Systems
- Security & Access Control Systems
- Mass Notification Systems
- Building Automation & Smart Buildings
- Preventative Maintenance
- Emergency Lighting Products

In addition to manufacturing our own products, Mircom also procures goods from other vendors that sell through our distribution network.

To support our production, Mircom sources electrical components and other raw materials from international suppliers, primarily located across nine (9) different countries: the United States of America, Mexico, the Dominican Republic, Sweden, Italy, Israel, China, South Korea and Taiwan. Said raw materials are stored at our manufacturing facilities in Vaughan and Montreal and used to produce

our finished products, which are then primarily sold across Canada, the United States of America, and several international markets.

[Our Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour](#)

Since the Company's incorporation, Mircom has prioritized conducting business in an ethical manner, by adopting business practices that exemplify integrity, accountability, and transparency. As Mircom continues to grow and expand operations across diverse regions and markets worldwide, our dedication to maintaining such ethical business practices has remained an utmost importance.

Mircom believes that our company's internal policies and guidelines are the cornerstone to achieving strong corporate governance. Said policies set out expectations for ethical behavior that we expect all stakeholders to adhere to.

Internal Review Prior to Supplier Engagement

Mircom prioritizes cultivating relationships with suppliers who are trustworthy and who share a commitment to responsible business practices. Prior to engaging with a supplier, Mircom's Supply Chain Management Team undertakes their best efforts to internally review a supplier's portfolio to ensure that their operating procedures are consistent with our company's ethical standards, including but not limited to the just treatment of workers and employees.

Fostering a relationship with trustworthy suppliers who share a dedication to similar values as our company, is an integral first step to ensuring our supply chain is both socially responsible and free from exploitation.

Mircom Group of Companies - Code of Conduct

In addition to the due diligence assessment outlined above, Mircom has implemented necessary measures to ensure all directors, officers, employees, staff, agents, and all other representatives (collectively referred to as "Representatives") are aware of the importance of upholding ethical and socially responsible business practices.

Specifically, Mircom's company-wide Code of Conduct outlines the high standards of integrity and professionalism that all Representatives are expected to uphold, as well as our ongoing commitment to promoting ethical behavior in all aspects of our business. Sections 9 and 10 of the Code of Conduct specifically outline Mircom's condemnation of forced labour and child labour practices in our workforce. Moreover, said sections reiterate that our suppliers shall not engage in conduct and/or operational practices that exhibit any elements of forced and child labour.

The above-noted sections ensure that our Representatives are dedicated to enforcing fair and safe working conditions globally. It is imperative that Mircom Representatives prioritize fostering relationships with individuals, corporations, entities and/or organizations who are committed to upholding common goals and values.

To ensure robust compliance, our Code of Conduct obligates all Representatives to comply with all applicable laws and regulations governing Mircom’s operations and to immediately report any material or suspected violations of the law and/or of the Code of Conduct, to our Human Resources Department.

The development of a comprehensive, company-wide, Code of Conduct provides assurance that all Representatives are dedicated to upholding Mircom’s commitment to eradicate forced labour and child labour practices on a global stage.

Company Policies Aimed at Preventing, and Reducing the Risk of Forced Labour and Child Labour Practices in Mircom Supply Chains

In subsequent fiscal years, Mircom has maintained a strong and unwavering position against unlawful and unethical labour practices, including forced labor and child labour.

In the current 2024 fiscal year, Mircom has extended our commitment beyond legal compliance, by passing a new company-wide policy (the “Policy”) that focuses on implementing proactive measures to help prevent and mitigate the risk of forced labour and child labour in our supply chains. This policy outlines Mircom’s dedication to ensuring that our operations are in material compliance with the Act and that our suppliers share a commitment to eradicating forced labour and child labour on a global stage.

In addition to ensuring that all employees are made aware of Mircom’s commitment to upholding the obligations set forth by the Act, Mircom will provide our current suppliers and any new suppliers moving forward, a copy of our Policy. Said suppliers will be required to notify Mircom upon their discovery of any acts, practices and/or operations that directly or indirectly engage in any form of forced labour and child labour.

Upon receiving said notice from a supplier, Mircom will take necessary action to enforce compliance with our Policy and the Act, or absent compliance, terminate our business relationship with said supplier.

Mircom’s Approach to Assessing and Managing the Risk of Forced Labour and Child Labour

Mircom is committed to regularly assessing our supply chain operations, to identify any high-risks regions that may deploy unlawful labour practices.

Mircom has not identified or received notice of any forced labour and/or child labour related incidents in our supply chain, during this past fiscal year. However, moving forward, Mircom is focused on enhancing our assessment measures to ensure that we mitigate the risks of forced and child labour, while also fostering a culture of transparency and accountability amongst our suppliers.

Measures to Remediate Forced Labour and Child Labour and Loss of Income

Mircom has not identified or received notice of any forced labour and/or child labour related incidents in our supply. As such, Mircom has not undertaken any actions to remediate the effects arising from forced labour and child labour.

Training for Mircom Employees on the Risks of Forced Labour and Child Labour

Mircom is committed to the continuous education of all directors, officers, employees and representatives of Mircom, on the unlawfulness and associated risks of forced and child labour. This will ensure that all individuals within our organization, including but not limited to members of our Supply Chain Management Team, Engineering Team and our Purchasing Agents, understand the importance of identifying unlawful labour practices within our supply chain.

Mircom recognizes that education and training sessions, empower our team to make informed decisions, uphold our company's values, and act as vigilant stewards of our ethical standards. Educated staff are better equipped to recognize and address potential violations, thus reinforcing our dedication to human rights and lawful labour practices.

Assessing Effectiveness of our Current Measures

It is of paramount importance that Mircom's directors, officers, employees, suppliers, and other representatives, are aware of our ongoing commitment to eradicating forced labour and child labour practices from global supply chains.

Mircom shall continue to annually review our company policies and Code of Conduct, to ensure that the provisions contained therein reinforce the obligations set forth in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Attestation

This report has been approved by Mircom's executive management team and Mircom's President and CEO, Mark Falbo, on May 30th, 2024.

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 Mircom Technologies Ltd. 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.

MIRCOM TECHNOLOGIES LTD.

A handwritten signature in blue ink, appearing to read "M. Falbo", written over a horizontal line.

Per: Mark Falbo - President & CEO

I have the authority to bind the corporation.