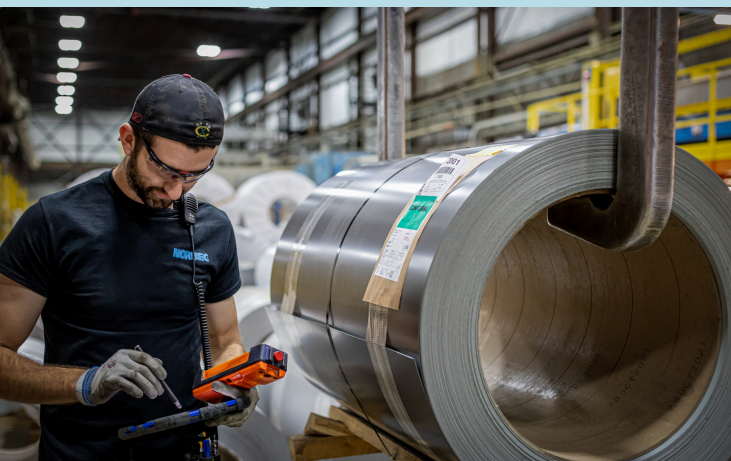




REPORT

UNDER BILL S-211

ON THE FIGHT AGAINST FORCED LABOUR AND CHILD
LABOUR
IN SUPPLY CHAINS



WHO ARE WE

Norbec is a North American leader in the manufacturing of prefabricated cold rooms, doors, as well as architectural panels for building envelopes.

OUR VISION

Norbec is committed to achieving sustainable growth by being a trusted partner and offering innovative solutions focused on the needs of our customers. These goals will be achieved through motivated employees and an unwavering desire to continually improve everything we do.

OUR MISSION

Our mission is to contribute to the creation of a sustainable world by manufacturing high-performance insulating solutions.

PURPOSE OF THIS REPORT

In accordance with Bill S-211, An act to enact the Fighting Against forced labour and child labour in supply chains, Norbec publishes this report for its 2023 fiscal year (January 1 to December 31). The initiatives and policies included herein apply to all Norbec divisions: Norbec Architectural Inc. (NAI), Systèmes Norbec Inc (SNI). and Groupe Norbec Inc. (GNI).

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Structure

Norbec operates two factories in Quebec and had approximately 325 employees in 2023. The panels for the building envelope (NAI) are produced in St-Hyacinthe and the panels/doors for cold rooms (SNI) are produced in Boucherville. A third factory will open in Ontario in 2024 for the NAI division.

Activities

The company sells its products on the Canadian and American market mainly in the following sectors: refrigerated warehouses, processing plants, commercial and institutional buildings, supermarkets, food services and laboratories.

To learn more about Norbec's purpose and activities, we invite you to visit our website www.norbec.com

Supply chains

The panels manufactured at Norbec are mainly composed of two raw materials: steel and polyurethane.

Steel: Steel is purchased mainly from Canadian manufacturers

Polyurethane: The components forming the polyurethane come only from American and Canadian manufacturers.

The suppliers we work with in these areas all adopt ESG policies and demonstrate leadership in this area.

From an overall point of view, if we consider all of the company's purchases, more than 90% are made from Canadian and American suppliers and manufacturers, which demonstrates a low risk of forced labour and child labour.

POLICIES AND DUE DILIGENCE PROCESSES RELATING TO FORCED LABOUR AND CHILD LABOUR

Norbec implemented a code of ethics in 2023 for its suppliers of goods and services. This code of ethics has been transmitted to all of the company's partners and commits our suppliers to respect labour laws.

Extract from the code of ethics:

Health and Safety

Suppliers must adhere to health and safety standards in compliance with applicable laws and regulations to ensure safe and healthy working conditions for all their employees. Additionally, they must take appropriate measures to prevent work-related injuries and accidents."

RISK ASSESSMENT AND MANAGEMENT / REMEDATION MEASURES

Norbec currently assesses the level of risk of forced labour and child labour in its supply chain as low.

TRAINING AND AWARENESS

In 2023 the company set up the “Sustainable Development Committee” to demonstrate its commitment to integrating ESG factors into its business management. In 2023, the group conducted an assessment of the company’s greenhouse gas emissions and residual materials.

The supplier code of ethics was also communicated to all employees who have relationships with suppliers of goods and services in order to make them aware of ethics in their business relationships.

EVALUATION OF THE EFFECTIVENESS OF MEASURES

Norbec keeps a register of suppliers who have signed the code of ethics. Norbec reserves the right to suspend or cancel the agreement with a supplier who does not respect the code of ethics.

APPROVAL AND ATTESTATION

In accordance with the requirements of the law, this report has been examined and verified by the management body of Norbec which certifies that the content is true:



Jan Lembregts, President and CEO



Claude Vincent, Chief Financial Officer



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