

REPORT: Fighting Forced Labour in Canadian Supply Chains

About Pioneering Technology Corp.:

Pioneering Technology Corp (“Pioneering” or “the Company”), based in Mississauga, Ontario (2785 Skymark Avenue, Unit 13, L4W 4Y3) is an "energy smart" technology company and North America's leader in innovative cooking fire prevention technologies and products. Our mission is simple: To help save lives and property from the number one cause of household fire – cooking fires. We do this by engineering and bringing to market energy-smart solutions that make consumer appliances safer, smarter, and more efficient. Our patented cooking fire prevention products address the multi-billion-dollar problem of cooking fires. According to the National Fire Protection Association, stovetop cooking is the number one cause of household fire and fire injuries in North America. Pioneering’s temperature limiting control (TLC) technology is now installed in over 450,000 multi-residential housing units across North America without a single cooking fire, delivering peace of mind and a solid return on investment for its customers. Pioneering’s proprietary cooking fire prevention solutions are suitable for upgrading and protecting the majority of the more than 140 million ranges and over 140 million microwave ovens in use throughout North America.

Pioneering (TSXV-PTE) is a small publicly traded company that engineers, designs its products in Canada and sells its after-market products primarily to property management companies and multi-residential property owners (including seniors, family, affordable/low-income, university and college, U.S. military housing) commercial buildings and healthcare facilities in North America and on US military bases around the world.

Pioneering Technology Corp. Code of Business Ethics and Conduct (an.excerpt)

At Pioneering our mission is to be the most professional, ethical and highest quality organization in the Fire Safety industry. Among our guiding principles are honesty, integrity and quality in all that we do. This Code of Business Conduct and Ethics (the "Code") has been adopted to further our guiding principles in seeking to accomplish our mission.

The Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees of Pioneering. All of our employees must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. The Code should also be provided to, and followed by, Pioneering agents and representatives, including consultants and suppliers. If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to manage the situation. Those who violate the standards in this Code will be subject to disciplinary action, up to and including immediate termination of employment.

Pioneering works with world class organizations to help guide us:

Auditors: KPMG LLP

Legal: Goodmans LLP, Bennett Jones LLP, Norton Rose Fulbright LLP

Regulatory/Compliance: UL, CSA, ETL/Intertek

U.S. Distributors: HD Supply, Home Depot PRO, Lowes Pro, Staples, Grainger and other regionals

Fighting Against Forced Labour and Child Labour in (Canadian) Supply Chains Act

This is Pioneering's first annual submission for compliance reporting pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act). This constitutes a report on the steps taken in past and during the first reporting year ending December 31, 2023. As this is an initial report, efforts were made to better understand the reporting requirements and start the process of developing a better framework and action plan for the Company and its partners in future years.

Consistent with this legislation and our commitment to ethical sourcing, our principal suppliers representing most of the products and components manufactured for and sold by Pioneering, are certified and/or regulated by manufacturers and distributors with established compliance mechanisms who have strong reputations in the industry. All of our products and components are listed/certified and tested during the manufacturing process which is reviewed regularly by ETL/Intertek, CSA and/or Underwriters Laboratories (UL) and compliant/conform to UL/CSA standards for sale in North America. Our manufacturing partners are ISO certified.

The below commitment regarding Modern Slavery and Forced Child Labour is central to our commitment to "Protecting People and Properties". Our vision and mission-based commitment is to make ALL peoples lives safer and better.

For the current reporting period, Pioneering is not aware of any instances of forced or child labour in our own operations or that of our suppliers/distributors.

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 Pioneering Technology Corp. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete to the best of my ability in all material respects for the purposes of the Act, for the reporting year 2023. Pioneering is a small company (7 full time employees). The responsibility for meeting the Act lies solely with the CEO who meets and/or speaks with the Company's primary contract manufacturer's regularly.



Kevin R. Callahan

Chief Executive Officer

May 25, 2024

I.have.approval.to.bind.the.entity;

Pioneering's Commitment to Ethical Supply Chain Sourcing

Our Business

Pioneering Technology Corp. (PTE) is a public company on the TSX-Venture Exchange. Pioneering is headquartered in Mississauga, Ontario, Canada, where it designs and engineers its unique patented cooking fire prevention/safety products. Our products are sold primarily to multi-residential facilities (including seniors, affordable, college & university housing) in the United States and Canada and to U.S. military communities/bases throughout the world. We are a proudly Canadian company, originally incorporated in 2006 with ethical employment practices including compliance with all local, provincial, and federal health and safety, environmental, human rights, labour and employment laws and regulations. We do not practice forced or child labour and we strictly condemn and prohibit any form of forced, child or illegal labour or slavery from our partner and vendor's supply chains.

Supply Chain and Due Diligence

Our principal suppliers, representing the majority of our products manufactured for Pioneering are distributed by Pioneering and its distribution partners. Our products are all tested, certified or listed by Nationally Recognized Testing Labs to meet all industry standards. Most of Pioneering's products and product components are manufactured in Canada, Europe and Asia. Our manufacturing partners are certified and/or regulated with established compliance mechanisms and have strong reputations in their industries. They adhere to diverse integration, strictly following and abiding to all relevant laws, specifically labour laws. Pioneering has always taken a zero-tolerance position as it pertains to forced or child labour and as it pertains to employee working conditions.

Pioneering's distribution partners are major North American based distributors that meet and exceed all necessary selling practices and demand responsible supplier relations.

These foundations help ensure that our products are not manufactured or distributed by companies that do not share our values. Pioneering will continue to monitor and influence its supply chain to help ensure responsible practices socially, environmentally and for product quality controls. Pioneering expects/demands that all suppliers, on an ongoing basis, establish and follow all local, provincial, and federal health, safety, environmental, human rights, labour and employment laws and regulations including all applicable laws regarding human trafficking, forced labour, child labour or other forms of modern slavery across its supply chains.

Code of Conduct

Pioneering is committed to acting ethically and with integrity and transparency in all of our business dealings. We uphold these values by providing a diverse, safe, healthy, respectful, and inclusive workplace for our employees and we give back regularly to the communities in which we operate. All employees receive a copy of Pioneering's Code of Business Ethics and Conduct which includes Human Rights in Canada. All employees are empowered to report any concerns with respect to potential violations of this code of business ethics and conduct and may do so through their senior executive team or anonymously to the CEO.

Pioneering's CEO has primary responsibility for managing its supply chain. Management employees or others involved in our supply chain, may receive additional training if/when required but all are empowered to report any suspected or controversial situations. Our value system and practices respect all human rights regulations and the Company will always make its best efforts to ensure that a zero-tolerance approach is operationalized against identified or suspicious modern slavery, human trafficking, or child labour across its supply chain. If any potential abuse is reported with respect to forced or child labour in our supply chain Pioneering will take serious and immediate action with the applicable supplier. If required, Pioneering will make efforts to remediate non-compliance and if the supplier fails to promptly remediate, the relationship with that supplier will be terminated.

Monitoring

An annual review will be conducted with input from key stakeholders to make the necessary updates based on new and evolving information resulting from ongoing updates and supply chain scrutiny.