

# **Annual Compliance Report under Bill S-211**

## **Combatting Forced Labour and Child Labour in Supply Chains Act**

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## Introduction

The following report has been drafted by TNR Industrial Doors Inc. in alignment with section 11 of Bill S-211 for the financial year ending December 31<sup>st</sup>, 2023. The entity covered by this report is TNR Industrial Doors Inc. (Business Number: 873306807).

For the purposes of the Act, TNR Industrial Doors Inc. (“TNR Doors”, “TNR”, “The entity”) meets the definition of a reporting entity under the act by having a place of business in Canada, doing business in Canada, and having assets in Canada.

Additionally, TNR meets two out of the three size-related thresholds related to revenue, assets, and workforce alongside meeting the criteria for controlling an entity engaged in producing, selling, or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada.

The guiding principles of TNR encompass integrity, humility, and accountability, shaping our operational and business conduct. This report, adhering to the guidelines provided in Bill S-211, outlines the methodologies and measures implemented to proactively combat the risks associated with forced and child labour across our supply chain and business practices.

Forced labour and child labour are contrary to our statement of purpose, vision, and values, therefore TNR does not endorse any human trafficking and modern slavery within its organization or any organization with whom it conducts business.

## 1. Structure, Activities and Supply Chain

Over the past 20 years, TNR Industrial Doors Inc. has been a service provider in the manufacturing of cost-effective and custom-built rubber door systems. Located in Barrie, Ontario, TNR has served clients in Canada and internationally including clients in the United States, Africa, and Mongolia. In addition, TNR has operated a sales center, Northwest Door, in Western Canada and has directly supported clients within this geography.

TNR is owned by the Hörmann Group of Companies, which is an ISO-certified industry leader that provides solutions and services for multiple industrial and commercial segments such as heavy industry, mining, waste management, manufacturing, distribution, parking, and cold storage.

Using the NAICS (North American Industry Classification System) Canada 2022 Version 1.0, sectors in TNR's supply chain and related activities were classified into the following industries:

- 33 – Manufacturing
  - 3323 - Architectural and structural metals manufacturing
- 41 – Wholesale trade
  - 4163 - Lumber, millwork, hardware, and other building supplies merchant wholesalers

## 2. Policies and Processes in Relation to Forced and Child Labour

In the previous fiscal year, TNR did not have any policies and due diligence processes related to the risks of forced or child labour within its supply chain.

However, TNR works with high-quality and reliable vendors that are ethically aligned with us as an organization, prioritizing honest and transparent business conduct. Our

vendor selectiveness provides an inherent safeguard against the risk of association with forced or child labour.

TNR has a purchase terms policy document which enforces a quality control management process for procurement. The document outlines the contractual terms and conditions governing the purchase orders and details the responsibilities of the seller and purchaser, including compliance with specifications and inspection. TNR is also ISO 9001:2015 compliant.

Maintaining ethical standards in operations and supply chains is a priority for TNR. Looking forward, TNR will aim to work with its vendors to proactively identify and address risks within the supply chain, such as forced and child labour risks and other unethical practices.

### 3. Identification of Forced and Child Labour Risk

To understand where in the supply chain forced or child labour risks may exist, TNR recently completed an in-depth supply chain risk assessment. This assessment relied on insights from authoritative sources such as the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour.

The objective of this risk assessment is not to presume the existence of forced or child labour in operations or supply chains. Instead, its purpose is to detect areas where such risks could emerge, enabling TNR to take proactive action to mitigate these risks. Given the widespread occurrence of forced and child labour across various industries, the assessment identifies sectors and geographic regions in the supply chain that might be more susceptible, especially where regulatory oversight and enforcement are less robust.

This risk evaluation concentrated on specific geographic areas marked by trusted sources like the Walk Free Global Slavery Index for an elevated risk of forced and child labour. This geographic assessment was further reinforced by examining product categories that are vulnerable to forced and child labour risks, enhancing the accuracy of the risk assessment performed.

### **Risk Assessment Findings**

TNR has determined that it has suppliers in four countries — Canada, United States, Germany, and Belgium. Canada accounted for the majority of the procurement expenditure followed by United States, Germany, and Belgium. All countries within TNR's import portfolio present a low risk in terms of prevalence of modern slavery, according to the Walk Free Global Slavery Index.

Furthermore, TNR analyzed data from the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour and cross-checked it against the product portfolio in the supply chain. This evaluation is essential for detecting specific goods among imports that might be susceptible to forced or child labor. Following this comparison, no products were identified as having a substantial risk of forced or child labour.

In conclusion, the risk assessment indicates a relatively low level of exposure to forced and child labour risks within the supply chain or any operating activities.

### **4. Remediation of Forced and Child Labour**

After a thorough analysis of our supply chain, TNR has not found any instances of forced and child labour in the previous reporting year.

In the event that TNR identifies or comes across any forced or child labour instance within our supply chain, we will adhere to the guidance provided by Public Safety Canada and refer to the OECD guidelines to chart out an appropriate course of forced or child labour remediation.

## 5. Remediation of Loss of Income

TNR has not found any instances of forced and child labour in our supply chain for the previous reporting year, and hence, have not identified any vulnerable families which may have experienced a loss of income.

In the event that TNR identifies or comes across any forced or child labour instance within our supply chain, we will adhere to the guidance provided by Public Safety Canada and refer to the OECD guidelines to chart out an appropriate course of loss of income remediation.

## 6. Employee Training

In the preceding fiscal year, TNR did not conduct any mandatory or voluntary training sessions for its workforce regarding the organization's code of conduct, with a particular focus on forced and child labour within the supply chain.

TNR is dedicated to cultivating a supply chain and workforce that collaboratively prioritize attentiveness and proactivity in addressing the risks of forced and child labor within the organization.

## 7. Assessing Effectiveness

TNR is unable to ascertain the effectiveness of the measures implemented to assess and manage the risk of forced labor and child labor for the previous reporting year.

TNR is committed to continuous improvement on this subject as an organization to ensure transparency and accountability in our supply chain operations.

### Conclusion

TNR has not yet included measures for addressing forced and child labor in its policy framework. However, TNR is committed to address the issue of forced and child labour in supply chains which affects more than 24 million people worldwide and supports Public Safety Canada and its vision. TNR will continue to strive for improvement and will adhere to the federal legislation, and any changes that will be introduced in the future.

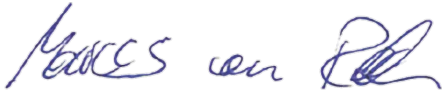
### 8. Approval and Attestation of the Report

In accordance with the requirements of the Act, and in particular Section 11, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable due 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.

Full Name: Marcus Von Reden

Title: President

Date: May 30th, 2024

Signature:   
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*I have the authority to bind TNR Industrial Doors Inc.*