



Tornatech Inc. Annual Report for the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)

Introduction

This report is filed by Tornatech Inc. (“Tornatech”) and outlines the steps Tornatech has taken during 2023, its most recently completed financial year, to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Tornatech or of goods imported into Canada by Tornatech.

Tornatech’s Structure and Activities

Tornatech was incorporated in 1985 and is a subsidiary of Groupe Tornatech that hold its headquarters in Laval, Quebec, Canada. Groupe Tornatech employs more the 320 employees globally from which around 220 are based in Canada working under Tornatech. Tornatech is a privately own company with majority shareholder based in Canada.

Tornatech is manufacturer of fire pump controllers. Its operations covers from designing to assembling the controller in its facility in Laval.

Supply Chains

Tornatech purchases products such as raw materials, packaging components, logistic services and contract manufactured goods from domestic and international suppliers. We work with more than 100 direct suppliers in over 20 countries, encompassing suppliers of all sizes, from SMEs through to global multi-nationals. Our largest procurement categories in fiscal year 2023 were for power electric components and electronics and our main countries of supply were Canada, United-States and Taiwan.

Tornatech Inc.
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Policies, Due Diligence and Assessment of Effectiveness

Tornatech's due diligence processes that relate to forced labour and child labour include:

- **Vendor Selection:** Potential vendors are assessed, including consideration of geographic location, human rights legislation and standard practices in those regions, and the nature of the work to be performed.
- **Supplier Code of Conduct:** Tornatech's Framework agreement Ethical Behavior clauses highlights the values that are important to Tornatech and is a guide to the standard of behaviour required of all suppliers, contractors, consultants and other third parties with whom Tornatech does business. The Framework Agreement expressly prohibits the use of forced labour and child labour. Compliance with the Ethical clauses of the Framework agreement is a standard requirement for all Tornatech supply chain contracts.
- **Vendor Technical Audits:** Tornatech conducts numerous vendor technical, and compliance audits every year which, in part, assess whether vendors have protections and processes in place to mitigate forced labour and child labour risks;
- **Risk Assessment:** Tornatech conducts an annual human rights risk assessment, which includes an evaluation of the effectiveness of the controls Tornatech has put in place to mitigate forced labour and child labour risks.
- **To safeguard the objectivity, accuracy, and strength of our efforts to prevent forced labour and child labour, we partnered with Assent Inc, a third-party service provider, to assist us in reviewing our supply chain and identifying risks of forced labour and child labour.**

Leveraging the industry-standard Slavery and Trafficking Risk Assessment Tool (STRAT), we engaged the strategic suppliers during the reporting year. These suppliers were prioritized for engagement on the basis of the risk associated with their sourcing countries and the industries they operate in;

- **Monitoring:** Tornatech reviews its global business activities on a quarterly basis to identify and assess activities in jurisdictions with elevated forced labour and child labour risks.
- **Policy and Regulatory Management System:** Tornatech has a process for managing policy and regulatory issues that encompasses forced labour and child labour; and
- **Reporting Channels:** A confidential reporting email channel is available to employees, suppliers, and the public to report matters of concern, including issues relating to forced labour and child labour.

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Remediation Measures

We recognize that our policies and programs may not prevent all adverse impacts in our supply chain. Our aim is to provide effective remedy where we have caused or contributed to those impacts and to use our leverage to encourage our suppliers or partners to provide remedy where we find impacts directly linked to our business operations, goods, or services. To facilitate this process, we have established several mechanisms that allow our employees, stakeholders, and other potentially affected individuals to raise grievances and seek remedy. In the event of any forced or child labour findings, we take immediate action to remediate the situation. This includes working with the supplier to address the issue, providing support for affected individuals, and, if necessary, terminating the relationship with the supplier.

During the reporting year, we uncovered three instances of insufficient risk management pertaining to forced or child labor within our immediate supply chain. We took steps to address this violation by implementing a compliance plan to address the issue and cutting ties with the suppliers involved.

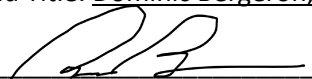
Training

All Tornatech personnel are required to complete annual training on Tornatech's Standards of Business Conduct Code, which is a guide to ethical decision making in support of Tornatech's value to "Act with Integrity".

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in my capacity as a director of Tornatech, I attest that I have reviewed the information contained in the report for the entities listed above. 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.

Full name and Title: Dominic Bergeron, Co-President, COO of Tornatech Inc

Signature: 

Date: 2024/04/09

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