

Fighting Against Forced Labour and Child Labour in Supply Chains Act: 2023 Annual Report

This statement is made pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). This statement outlines the approach and initiatives by Troy Life & Fire Safety Ltd., and its parent corporation Troy LFS Holdings Inc., to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing January 1, 2023, and ending December 31, 2023.

Steps Taken During the 2023 Fiscal Year to Prevent and Reduce Risks of Forced Labour and Child Labour

Troy is committed to conducting business in a way that is ethical, that follows all laws and regulations, and that provides the highest level of customer service possible. Troy is committed to respecting human rights and ensuring our supply chain is free from forced labour and child labour.

Troy has had in place for a number of years a Supplier Code of Conduct that requires all Troy Suppliers to abide by all applicable laws and regulations, which includes the Act. Additionally, Troy's Environmental, Health and Safety Policy restricts the hiring of young people.

Troy has implemented a process for identifying and prohibiting the use of forced labour and/or child labour in our own activities. Troy also requires suppliers to have policies and procedures in place to identify and prohibit the use of forced labour and/or child labour. Troy monitors its larger suppliers by conducting an annual survey to confirm each of the aforementioned processes are in place.

Corporate Structure, Activities and Supply Chains

Troy Life & Fire Safety Ltd. provides life safety systems and services across Canada. Troy Life & Fire Safety Ltd. employs over 1,100 employees. Troy's primary business activities include the design, supply, installation and service of Fire Protection (Sprinkler) systems and the design, programming and maintenance of Fire Detection (Fire Alarm) systems.

This report is a joint report on behalf of Troy Life & Fire Safety Ltd. and Troy LFS Holding Inc. as the information provided in this report applies to both corporations. Throughout the report, both entities will be jointly referred to in this report as "Troy". Both corporations are privately owned corporations, incorporated pursuant to the *Canada Business Corporations Act*. The board of directors for Troy Life & Fire Safety Ltd. is the same as the board of directors for Troy LFS Holdings Inc., Troy Life & Fire Safety Ltd. is under the control of Troy LFS Holdings Inc.

The business operating currently under the name of Troy Life & Fire Safety Ltd. was established on March 5, 2007, originally named Troy Sprinkler Limited. Troy LFS Holdings Inc. was established on January 1, 2015.

Both Troy Life & Fire Safety Ltd. and Troy LFS Holdings Inc. have their head office at 1042 2nd Avenue East, Owen Sound, Ontario.

Troy has no reporting obligations under other supply chain legislation in another jurisdiction.

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Troy Life & Fire Safety Ltd. does not produce any goods as part of our business, but it does import goods that are produced outside of Canada. Troy Life & Fire Safety Ltd. distributes goods outside of Canada. Troy primarily imports good from the United States of America (USA). The majority of companies that supply goods to Troy are large, international companies. Troy engages the services of sub-contractors within Canada, which may include very small organizations, or larger corporations/partnerships.

Approximately 65% of Troy’s suppliers are Canadian based and approximately 34% of Troy’s suppliers are based in the USA. Less than 1% of Troy’s suppliers are based out of Great Britain.

Policies and Due Diligence Processes

At Troy, we are committed to conducting business in a way that is ethical, that follows all laws and regulations, and that provides the highest level of customer service possible. Troy has a Code of Conduct that applies to all our employees, officers and directors. This Code of Conduct sets out our minimum standards for doing business to ensure all Troy employees adhere to our high standards of business ethics, integrity and adherence to all applicable laws and regulations.

Troy has a Supplier Code of Conduct that applies to all Suppliers and Sub-Contractors. This Supplier Code of Conduct sets out guidelines for all Troy suppliers and sub-contractors, their owners, employees, agents partners and sub-contractors, on how they are to approach doing business while working with Troy. As part of this Supplier Code of Conduct, Suppliers and Sub-Contractors are “required to perform their duties in accordance with all applicable laws and regulations and other legal and business requirements.” This requirement applies to the Act.

Part of Troy’s process to monitor that our Suppliers adhere to all applicable laws and regulations, Troy requests our Suppliers to complete an annual questionnaire and confirm that the Supplier is adhering to various laws and regulations, including the Act. It is our intent to broaden the scope of our monitoring to include subcontractors.

Forced Labour and Child Labour Risks

The risk of forced labour and/or child labour among our personnel is negligible. Troy’s hiring processes ensure compliance with all Canadian laws and regulations, including the Act.

Currently, Troy’s processes assess the risk of forced labour and/or child labour within its own personnel and its tier one suppliers. Troy requires its tier one suppliers to have policies in place to prevent the use of forced labour and/or child labour.

There may be a risk of forced labour and/or child labour within Troy’s tier two and/or tier three suppliers. There is no direct commercial relationship between Troy and its tier two and tier three suppliers. Although such a risk is possible, Troy’s tier one suppliers have not identified any of forced labour and/or child labour.

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Remediation Measures

As Troy has not identified any risk of forced labour and/or child labour within its own activities or the activities of its tier one suppliers, remediation measures have not been required.

Remediation of Loss of Income

As Troy has not identified any risk of forced labour and/or child labour within its own activities or the activities of its tier one suppliers, remediation of loss of income measures have not been required.

Training

Troy is in the process of developing training on identifying and preventing the use of forced labour and child labour in its own activities and within the activities of its supply chain.


Assessing Effectiveness

Troy's only introduced certain measures to identify and reduce the risk of forced labour and/or child labour within its supply chain during the last financial year. Troy has not yet taken any measure to assess the efficiency of these measures.

Approval and Attestation

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 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.

Troy Life & Fire Safety Ltd.
Troy LFS Holdings Inc.

Per: 
Name: James McCoubrey
Title: President and CEO
Date: May 21, 2024

I have authority to bind the Corporations