



Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9 (the “Act”) – 2025 ANNUAL REPORT

INTRODUCTION

This report has been prepared by Mircom Technologies Ltd and its related entities and subsidiaries (collectively referred to as “Mircom Group of Companies” or “Mircom”) for the financial reporting year ending on **September 30, 2024**.

Mircom continues to remain classified as an “entity” as defined in section 2 of the “*Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and has therefore prepared this report to highlight action taken this past fiscal year to promote the initiatives set forth in the Act and the proactive measures implemented to mitigate risks in our supply chain moving forward. As a global industry leader and responsible corporate entity, Mircom recognizes the importance of eradicating forced labour and child labour practices from global supply chains and is dedicated to taking necessary action to ensure that our operations are in material compliance with the Act.

This is the second annual report prepared and submitted by Mircom since the reporting obligations under the Act came into effect. As noted in section 11(1) of the Act, every entity must report on the steps taken during its **previous financial year**, to prevent and reduce the risk of forced labour and child labour at any stage of its operations.

STRUCURE, ACTIVITIES AND SUPPLY CHAIN

Legal and Organizational Structure

Mircom Technologies Ltd is a valid and subsisting corporation, incorporated pursuant to the laws of the Province of Ontario, and has remained under consistent private ownership for over three decades. Mircom is a global designer, manufacturer and distributor of life safety, fire protection, building communication, security, mass notification and smart home solutions. Mircom is committed to being a full solution provider and operates a dedicated network of sale and service offices worldwide, under the Mircom Engineered Systems brand.

Mircom is managed by a board of directors who possess extensive knowledge and experience in the industry. The founder of Mircom, Mr. Tony Falbo, continues to serve as a director of the Corporation as of today’s date. Mircom’s President and CEO, Mr. Mark Falbo, is responsible for the overall execution of the company’s business strategy and management of day-to-day operations.

Mircom’s company mandate and mission is to make *Safer, Smarter, More Livable Buildings*. Mircom prioritizes the protection of lives and property by maintaining a customer centric focus, leveraging a program of continuous improvement and delivering cost effective life safety system solutions.



Mircom's manufacturing and service divisions meet ISO 9001: 2015 standards, a globally recognized standard for quality management and international benchmark for professional business management and quality control processes. Furthermore, Mircom is currently a member of the following industry recognized organizations: National Fire Protection Association (NFPA), Society of Fire Protection Engineers (SFPE), Canadian Fire Alarm Association (CFAA), Canadian Security Association (CANASA) and Underwriters Laboratories of Canada (ULC).

Our Supply Chain – An Overview

Mircom's supply chain and operations are extensive and globally integrated.

Mircom operates two main manufacturing and production facilities in Canada located in Vaughan, Ontario and Montreal, Quebec, where we manufacture a wide range of products, relating to:

- Fire Detection & Alarm Systems
- Communication & Voice Entry Systems
- Security & Access Control Systems
- Mass Notification Systems
- Building Automation & Smart Buildings
- Preventative Maintenance
- Emergency Lighting Products

Mircom maintains complete command and control of their product development process, from initial concept and design to the delivery of finished products. With core manufacturing operations based in Canada, Mircom retains direct oversight of how its products are made, including control over components, features and final assembly.

In addition to manufacturing our own products, Mircom also procures goods from other vendors that sell through our distribution network. To support our production, Mircom sources electrical components and other raw materials from several reputable international suppliers. Said raw materials are stored at our manufacturing facilities in Toronto and Montreal and used to produce our finished products, which are then primarily sold across Canada, the United States of America, and several international markets. This integrated supply chain and production model allows us to maintain high standards of quality, responsiveness, and reliability across all aspects of our operations.

Mircom's Vice President of Operations, Mervin Naidoo, is responsible for leading our procurement, planning, and manufacturing department. In carrying out his responsibilities, Mr. Naidoo oversees staff involved in all aspects of supply chain operations. This includes managing procurement activities, guiding supply chain strategy, and ensuring efficient sourcing processes.

POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO ADDRESSING FORCED LABOUR AND CHILD LABOUR PRACTICES

Since incorporation, Mircom has consistently embraced practices that reflect core values of integrity, accountability, and transparency. Mircom believes that our company's internal policies and guidelines are the cornerstone to achieving strong corporate governance. Said policies set out expectations for ethical behavior that we expect all stakeholders to adhere to.

During the past fiscal year (the subject of this report), Mircom continued to actively promote the value of responsible business conduct among our employees, reinforcing the importance of professional, responsible and ethical behaviour. Responsible business practices are integrated into Mircom's corporate identity and remain a key driver of long-term success.

Company Policy on Addressing the Risk of Forced Labour and Child Labour Practices in Mircom Supply Chains

Mircom has continued to maintain a strong and unwavering position against unlawful and unethical labour practices, including forced labor and child labour.

In our past fiscal year ending on September 30, 2024 (the subject of this report) Mircom adopted a company-wide policy (the "Policy"), to demonstrate our commitment to the objectives of the Act and to ensure our suppliers share a commitment to eradicating forced labour and child labour on a global stage. The policy implements proactive measures to assess, prevent and mitigate the risk of forced labour and child labour in our supply chains. Mircom distributed a notice summarizing this policy to its key international suppliers, establishing an obligation for them to notify Mircom of any actions, practices, or operations that may violate the Policy and/or the Act, including but not limited to:

- A. Any acts, practices and/or operations that directly or indirectly employ any form of forced labour, including but not limited to, actions whereby an individual is coerced to work through physical violence or intimidation, debt bondage, human trafficking, involuntary servitude, and/or threats of denunciation to immigration;
- B. Any acts, practices and/or operations that subject workers within the supplier's organization to involuntary or coerced labor, including but not limited to, the withholding of wages, and/or confiscation of identification documents;
- C. Any acts, practices and/or operations that directly or indirectly employ any form of child labour, which includes but is not limited to, exposing children to work that is mentally, physically, socially and/or morally dangerous, which may deprive them of their childhood, dignity, interfere with their right to education and/or which may be harmful to their physical and mental development.



Upon receiving any such notice from a supplier, Mircom has expressed a commitment to investigate the matter further and take appropriate steps, including terminating our business relationship, should the supplier's acts, practices or operations be found non-compliant with the Policy or in contravention of the Act. This approach reflects Mircom's dedication to upholding the ethical and legal standards set out in both the Act and our internal Policy.

Several months after distributing the notice, Mircom conducted an internal review to assess any responses and evaluate any reported concerns. As of today's date, Mircom has not identified any acts, practices or operations within its supply chain that directly or indirectly involve forced labour or child labour. Furthermore, Mircom has not received any notification from our suppliers indicating the presence of such practices, as of today's date.

Mircom Group of Companies - Code of Conduct

As noted in our previous report, Mircom continues to ensure all directors, officers, employees, staff, agents, and all other representatives (collectively referred to as "Representatives") are aware of the importance of upholding ethical and socially responsible business practices.

As of today's date, Mircom's company-wide Code of Conduct continues to remain in full force and effect, highlighting our ongoing commitment to promoting ethical behavior in all aspects of our business. Sections 9 and 10 of the Code of Conduct specifically outline Mircom's condemnation of forced labour and child labour practices in our workforce. Moreover, said sections reiterate that our suppliers shall not engage in conduct and/or operational practices that exhibit any elements of forced labour and child labour.

The Code of Conduct is made available to all Representatives to ensure that they remain dedicated to enforcing fair and safe working conditions. As of today's date, Mircom has not received any notice of any material or suspected violations of the Code of Conduct specifically with respect to Sections 9 and 10, which address the prohibition of forced labour and child labour practices.

EVALUATING FORCED LABOUR AND CHILD LABOUR RISKS

Notwithstanding the fact that Mircom has not received notice of, nor identified, incidents of any forced labour and /or child labour within our supply chain, we remain committed to regularly assessing supply chain operations to identify risks and regions where unlawful labour practices may occur.

Internal Review Prior to Supplier Engagement

Mircom prioritizes cultivating relationships with suppliers who are trustworthy and who share a commitment to responsible business conduct. Prior to engaging with a supplier, Mircom's Supply Chain Management Team undertakes their best efforts to internally review a supplier's portfolio to assess alignment with our standards, including but not limited to the fair and just treatment of workers and employees.



As part of our broader approach to responsible sourcing, we recognize the importance of identifying and assessing potential risks within our supply chains. To this end, we undertake efforts to map our supply chains based on procurement activities, taking into account the different regions where our suppliers operate. Mircom will continue to communicate our expectations to suppliers with the goal of promoting ethical practices across our supply chain.

REMEDATION MEASURES

Remediation of Forced Labour and Child Labour

Mircom has not identified or received notice of any forced labour and/or child labour related incidents in our supply. As such, Mircom has not undertaken any actions to remediate the effects arising from forced labour and child labour. As of today's date, Mircom has not received any evidence of instances of forced labour or child labour in its operations and/or supply chains.

Remediation of Loss of Income

Mircom acknowledges that efforts to prevent and reduce risks of forced labour and child labour can have the unintended consequence of contributing to a loss of income for vulnerable families. As of today's date, Mircom has not identified or received notice of incidents where vulnerable families have experienced loss of income as a result of steps that Mircom has taken to eliminate forced labour and child labour risks. As such, Mircom have not implemented any necessary remediation measures.

TRAINING

Mircom continues to evaluate the development of training modules and other educational initiatives to raise awareness about the risks and unlawfulness of forced labour and child labour. Mircom has specifically considered targeted training specifically designed for key members of our staff, including Procurement Agents, the Engineering Design Team, and Operations and Supply Chain Management. These efforts will ultimately equip our staff with the knowledge to identify and address unethical labour practices within our supply chain, thereby reinforcing our commitment to ethical standards and human rights.

ASSESSING THE EFFECTIVENESS OF OUR CURRENT MEASURES

It continues to remain a paramount importance that Mircom's director, officers, employees, suppliers, and other representatives, are aware of our ongoing commitment to eradicating forced labour and child labour practices from global supply chains.

To support this commitment, Mircom is dedicated to conducting an annual review of applicable policies each calendar year to ensure that our standards and practices continue to align with the obligations set forth in the Act and remain relevant in addressing the growing risks of child labour and forced labour.



As part of our effort to assess effectiveness of our current measures, Mircom continues to monitor our suppliers' responses to ethical sourcing requirements and whether any concerns or potential violations have been reported.

Attestation

This report has been approved by Mircom's executive management team and Mircom's President and CEO, Mark Falbo, on May 30th, 2025.

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 Mircom Technologies Ltd. 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.

MIRCOM TECHNOLOGIES LTD.

A handwritten signature in black ink, appearing to read "Mark Falbo", written over a horizontal line.

Per: Mark Falbo - President & CEO

I have the authority to bind the corporation.