

O'Dell HVAC Group Inc. Forced Labour Statement 2025

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023) (the “Act”) requires certain companies to issue a statement regarding the steps they have taken in the previous year to prevent and reduce the risk of forced labour and child labour in the production or importation of goods.

The Report constitutes O'Dell HVAC Group Inc.'s (“O'Dell”) inaugural disclosure under the Act and outlines the measures that O'Dell has taken to evaluate forced-labour and child-labour risks within its operations and supply chain for the fiscal year ended March 31, 2025. Where relevant, the Report further describes the preventive controls O'Dell has instituted to mitigate and eliminate the possibility of forced or child labour at any point in its business. O'Dell has no additional supply-chain reporting obligations under legislation in jurisdictions outside Canada.

1.0 Organization

O'Dell is a Canadian corporation established in 1987 as a Manufacturer's Representative specializing in commercial HVAC equipment. We employ 129 people across Canada, with headquarters and all operations based in Ontario. O'Dell does not currently have partner organizations or joint ventures.

2.0 Risks of Forced Labour and Child Labour in Operations and Supply Chain

Our supply chain includes direct and indirect vendors of complete HVAC units, individual components, installation materials and related services. Approximately 30 percent of our annual procurement spend is with U.S.-based suppliers; the remaining 70 percent is sourced primarily from Ontario and Quebec suppliers.

Through light online risk-mapping of our top two to three suppliers—reviewing publicly available worker-welfare policies, news reports of labour disputes, etc.—and annual on-site visits, we have not identified any confirmed instances, or any material risk, of forced or child labour.

3.0 O'Dell Policies and Code of Conduct

3.1 Vendor Relations Policy

We engage with suppliers whose capabilities and conduct align both with our operational requirements and with O'Dell's ethical standards. O'Dell will not knowingly contract with—or procure goods or services from—any entity that permits, requires, or otherwise endorses the use of forced labour or child labour.

3.2 Due Diligence Procedures, Training and Measuring Effectiveness

As noted above, O'Dell's supplier base is based in North America, which limits the exposure O'Dell has to forced labour and child labour with its direct suppliers. In light of this, O'Dell does not currently maintain a formal, documented process or training specifically for identifying or mitigating child-labour or forced-labour risks in its supply chain, nor does it have any measures in place to assess its effectiveness in these areas. However, we acknowledge the critical importance of these issues and are considering implementing measures targeting relevant employees in the near term.

5.0 Remediation Processes

During the previous financial year, no instances of forced labour or child labour have been detected within our operations or supply chain. Consequently, the Company has not taken any remediation measures in response to any specific concerns, and no measures were taken to remediate loss of income to vulnerable populations. However, should any instances of forced labour or child labour arise, the Company will evaluate and implement suitable remedial strategies

6.0 Approval

This Forced Labour Statement for the fiscal year ended March 31, 2025, has been reviewed and approved by the Board of Directors of O'Dell HVAC Group Inc. in accordance with section 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that the Board has reviewed the information contained in this statement and that, based on my knowledge and having exercised reasonable diligence, the information is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Name: Vailly Larouche

Title: VP Finance

Date: May 30, 2025

Signatures:

