



Annual Compliance Report under Bill S-211

Combatting Forced Labour and Child Labour in Supply Chains Act

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Introduction

This report has been prepared by **TNR Industrial Doors Inc.** in accordance with Section 11 of Bill S-211 for the fiscal year ending December 31, 2024. The entity covered in this report is:

TNR Industrial Doors Inc. (Business Number: 873306807)

As per the requirements of the Act, TNR Industrial Doors Inc. (“TNR Doors,” “TNR,” or “The entity”) qualifies as a reporting entity by maintaining a place of business in Canada, conducting business operations within the country, and holding assets in Canada. Furthermore, TNR satisfies two out of the three size-related criteria related to revenue, assets, and workforce, and meets the definition of controlling an entity involved in producing, selling, distributing, or importing goods into Canada, whether these goods are produced domestically or abroad.

TNR's core principles—integrity, humility, and accountability—serve as the foundation for our operational and business conduct. This report, in compliance with Bill S-211, outlines the strategies and actions implemented to effectively address and mitigate the risks associated with forced and child labour throughout our supply chain and business operations.

Forced labour and child labour are in direct conflict with TNR’s mission, vision, and values. As such, TNR firmly opposes human trafficking and modern slavery within its own operations and across the organizations with which we do business.

1. Structure, Activities and Supply Chain

For the past two decades, TNR Industrial Doors Inc. has been a trusted provider of cost-effective, custom-built rubber door systems. Based in Barrie, Ontario, TNR serves a diverse clientele both within Canada and internationally, including customers in the United States, Africa, and Mongolia. TNR also operates a sales center, Northwest Door, in Western Canada, offering direct support to clients within that region.

TNR is a subsidiary of the Hörmann Group of Companies, an ISO-certified global leader offering solutions and services across various industrial and commercial sectors, including heavy industry, mining, waste management, manufacturing, distribution, parking, and cold storage.

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

- 33 – Manufacturing
 - o 3323 – Architectural and Structural Metals Manufacturing
- 41 – Wholesale Trade
 - o 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 formal policies or due diligence processes specifically addressing the risks of forced or child labour within its supply chain.

Nonetheless, TNR partners with trusted and reputable vendors who share our commitment to ethical business practices, emphasizing transparency and integrity in all operations. Our careful selection of vendors inherently reduces the risk of engaging with suppliers involved in forced or child labour.

TNR maintains a purchase terms policy that governs procurement activities through a robust quality control management process. This policy outlines the contractual terms and conditions for

purchase orders, clarifying the roles and responsibilities of both the seller and the purchaser, including adherence to specifications and inspection procedures. Additionally, TNR is ISO 9001:2015 compliant, further reinforcing our commitment to quality and ethical standards.

Upholding high ethical standards within our operations and supply chain is a key priority for TNR. Moving forward, we aim to collaborate with our vendors to proactively identify and address potential risks, including forced and child labour, and other unethical practices within our supply chain.

If a case of forced or child labour is identified within our supply chain, TNR will take immediate and decisive action. First, we will sever all business ties with the supplier involved, terminating any ongoing contracts or business activities with them. We recognize that such practices have no place in our operations, and we will ensure that the supplier is removed from our approved vendor list.

In addition, we will thoroughly investigate the situation and report it to the relevant authorities, ensuring full compliance with applicable laws and regulations. We are committed to transparency in such matters and will work with legal and regulatory bodies to ensure that those responsible are held accountable. Our commitment to ethical conduct extends to actively supporting efforts to eradicate forced and child labour and preventing such violations from recurring.

3. Identification of Forced and Child Labour Risk

To better understand potential risks of forced or child labour within our supply chain, TNR recently conducted a comprehensive risk assessment. This assessment was informed by reputable sources such as the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour.

The goal of this risk assessment is not to assume the presence of forced or child labour within our operations or supply chains. Rather, its purpose is to identify areas where these risks could arise, allowing TNR to take proactive steps to address and mitigate them. Given the prevalence of forced and child labour in many industries, the assessment focuses on identifying sectors and regions within the

supply chain that may be more vulnerable, particularly those where regulatory oversight and enforcement may be weaker.

This evaluation emphasized geographic regions that are identified as having a higher risk of forced and child labour, according to trusted sources like the Walk Free Global Slavery Index. In addition, we examined product categories known to be particularly susceptible to such risks, which strengthened the accuracy and relevance of the risk assessment.

Risk Assessment Findings

TNR has identified that its suppliers are located in four countries: Canada, the United States, Germany, and Belgium. The majority of TNR's procurement expenditure is concentrated in Canada, followed by the United States, Germany, and Belgium. According to the Walk Free Global Slavery Index, all the countries within TNR's import portfolio present a low risk regarding the prevalence of modern slavery.

Additionally, TNR reviewed data from the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour and cross-referenced it with the products in our supply chain. This comparison is crucial for identifying any goods that may be at risk of being produced through forced or child labour. After completing this assessment, no products were found to have a significant risk of being associated with forced or child labour.

In summary, the findings from the risk assessment suggest that TNR's supply chain and operational activities are exposed to a relatively low level of forced and child labour risks.

4. Remediation of Forced and Child Labour

Following a comprehensive analysis of our supply chain, TNR has not identified any instances of forced or child labour during the previous reporting year.

However, should TNR discover any occurrence of forced or child labour within our supply chain, we will follow the guidance outlined by Public Safety Canada and refer to the OECD Due Diligence Guidelines to determine an appropriate course of action for remediation. This may include working

closely with the relevant authorities, addressing the issue with the affected supplier, and taking corrective steps to eliminate such practices from our supply chain.

5. Remediation of Loss of Income

TNR has not found any instances of forced or child labour in our supply chain during the previous reporting year, and as a result, we have not identified any families that may have suffered a loss of income due to these practices.

However, if TNR were to identify any instances of forced or child labour within our supply chain, we will follow the guidance provided by Public Safety Canada and adhere to the OECD guidelines to determine an appropriate course of action for remediating any loss of income. This would include taking steps to support affected individuals and families, ensuring they receive the necessary assistance and compensation where applicable.

6. Employee Training

During the previous fiscal year, TNR did not conduct any mandatory or voluntary training sessions for its workforce specifically focused on the organization's code of conduct, particularly with regard to forced and child labour within the supply chain.

TNR is committed to fostering a supply chain and workforce that actively prioritize awareness and proactive measures to address the risks of forced and child labour. Moving forward, we aim to implement training initiatives that will equip our employees with the knowledge and tools to recognize and respond to these issues effectively.

7. Assessing Effectiveness

TNR has been unable to fully assess the effectiveness of the measures implemented to address and manage the risks of forced and child labour during the previous reporting year.

Nevertheless, TNR remains dedicated to the ongoing improvement of our efforts in this area. We are committed to ensuring transparency and accountability in our supply chain operations and will continue to evaluate and enhance our approach to managing these risks.

Conclusion

While TNR has not yet incorporated specific measures for addressing forced and child labour into its formal policy framework, we are committed to tackling this critical issue. Forced and child labour affect over 24 million people worldwide, and TNR fully supports Public Safety Canada and its vision for combating these practices. Moving forward, TNR will continue to strive for improvement, adhering to federal legislation and responding to any updates or changes that may 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: Nick Marando

Title: President

Date: 28MAR2025

Signature: 

I have the authority to bind TNR Industrial Doors Inc.