



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 2025, 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 which holds 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 owned company with majority shareholder based in Canada.

Tornatech’s primary operations are located in Laval, Québec, Canada. The company also operates manufacturing facilities in Dubai (UAE) and Belgium, as well as office locations in the United States and Singapore.

This report applies to Tornatech Inc. only. Tornatech Inc. does not control any other entities that meet the reporting requirements under the Act.

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 small and medium-sized enterprises to large multinational corporations.

Tornatech’s primary procurement categories during the reporting year included power electrical components and electronic parts used in the manufacturing and assembly of fire pump controllers.

The company’s principal sourcing countries included Canada, the United States, Taiwan, and other international jurisdictions.

Tornatech Inc.
4100 Desserte Sud, (A-440 Ouest)
Laval, Québec, Canada H7T 0H3

Tel: +1 514 334 0523



As part of its supply chain oversight activities, Tornatech evaluates suppliers based on various factors, including operational capability, quality requirements, regulatory compliance, and potential human rights risks associated with geographic location and industry sector.

Tornatech continues to monitor and assess these risks through its supplier qualification, audit, and due diligence processes.

Policies, Due Diligence

Tornatech 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 Framework agreement Ethical Behavior clauses outline the values and standards of conduct expected from suppliers, contractors, consultants and other third parties with whom Tornatech conducts business. The Framework Agreement expressly prohibits the use of forced labour and child labour. Compliance with the ethical requirements of the Framework Agreement is a standard requirement for all Tornatech supply chain contracts. Tornatech communicates these expectations to relevant suppliers as part of its supplier onboarding and contractual processes.
- **Vendor Technical and Compliance Audits:** Tornatech conducts numerous vendor technical, and compliance audits on a regular basis to assess supplier performance and verify whether vendors have protections and processes in place to mitigate forced labour and child labour risks.
- **Risk Assessment:** Tornatech conducts periodic human rights risk assessment, which include evaluating risks associated with supplier geographic location, industry sector, and sourcing activities. These assessments also support the evaluation of the effectiveness of the controls implemented to mitigate forced labour and child labour risks. To support the objectivity, consistency, and effectiveness of its supply chain due diligence activities, Tornatech partners with Assent Inc., a third-party service provider, to assist in reviewing supply chain risks related to forced labour and child labour. Leveraging the industry-standard Slavery and Trafficking Risk Assessment Tool (STRAT), Tornatech engaged strategic suppliers during the reporting year. Suppliers were prioritized based on risk factors associated with sourcing countries and industry sectors.
- **Monitoring activities:** Tornatech reviews aspects of its global business activities and supply chain operations on a periodic basis to identify and assess activities in jurisdictions with elevated forced labour and child labour risks.
- **Policy and Regulatory Management System:** Tornatech maintains internal processes for monitoring and managing policy, regulatory, and compliance matters related to ethical business conduct, including forced labour and child labour requirements.

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- **Reporting Channels:** Tornatech maintains a confidential reporting channel available to employees, suppliers, and external stakeholders to report matters of concern, including issues relating to forced labour and child labour.

During the reporting year, Tornatech did not identify any confirmed instances of forced labour or child labour within its operations.

Risks of Forced Labour and Child Labour

Tornatech recognizes that risks of forced labour and child labour may exist within global supply chains, particularly in industries and regions associated with the sourcing of electrical, electronic, and manufactured components.

Tornatech assesses potential risks associated with suppliers based on factors including geographic location, industry sector, sourcing activities, and the complexity of the supply chain.

The company's supply chain includes suppliers located in Canada, the United States, Taiwan, and other international jurisdictions.

Certain sourcing regions and product categories may present a higher inherent risk of forced labour or child labour due to country-specific human rights conditions and global supply chain dynamics.

To identify and manage these risks, Tornatech conducts supplier due diligence activities, including supplier screening, risk assessments, contractual compliance requirements, and supplier audits.

Strategic suppliers are prioritized for further assessment based on risk indicators associated with their operating regions and industries.

Tornatech continues to monitor developments related to forced labour and child labour risks and reviews its risk management processes periodically to support ongoing compliance and responsible sourcing practices.



Remediation Measures

Tornatech recognizes that its policies and due diligence processes may not fully eliminate all risks related to forced labour or child labour within global supply chains.

The company maintains mechanisms intended to support the identification, reporting, and remediation of potential issues related to forced labour and child labour.

Employees, suppliers, and external stakeholders may report concerns through Tornatech confidential reporting channels.

Where potential issues or non-compliance concerns are identified, Tornatech may engage with suppliers to implement corrective actions and improve compliance with applicable ethical and contractual requirements.

Depending on the nature and severity of the issue, remediation measures may include enhanced supplier monitoring, corrective action plans, supplier reassessments, or termination of the business relationship.

During the reporting year, Tornatech did not identify any confirmed instances of forced labour or child labour within its operations or supply chain that required remediation measures.

Remediation of Loss of Income to Vulnerable Families

Tornatech recognizes that measures taken to prevent or eliminate forced labour or child labour may, in certain circumstances, have unintended adverse impacts on vulnerable individuals or families.

During the reporting year, Tornatech did not identify any instances requiring measures to remediate the loss of income to vulnerable families resulting from efforts to address forced labour or child labour risks within its operations or supply chain.

Accordingly, no remediation measures of this nature were required during the reporting period.

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".

The training includes awareness relating to ethical business conduct, compliance obligations, and reporting mechanisms, including matters associated with forced labour and child labour risks.

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Assessment of Effectiveness

Tornatech evaluates the effectiveness of its measures intended to prevent and reduce the risks of forced labour and child labour through its supplier due diligence, risk assessment, monitoring, and compliance processes.

The company periodically reviews its supplier management and risk mitigation activities, including supplier assessments, audit activities, contractual compliance requirements, and supplier engagement initiatives.

Tornatech also monitors developments related to forced labour and child labour risks within its supply chain and reviews relevant internal processes and controls to support ongoing compliance and responsible sourcing practices.

During the reporting year, Tornatech did not identify any confirmed instances of forced labour or child labour within its operations or supply chain.



Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for Tornatech Inc.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year indicated above.

I have the authority to bind Tornatech Inc.

This report was approved by the governing body of Tornatech Inc.

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

Signature: 

Date: 2026/05/07