

Annual Compliance Report under Bill S-211

Combatting Forced Labor and Child Labor in Supply Chains Act

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Introduction

This report has been prepared by **Hörmann Oro-Medonte 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:

Hörmann Oro-Medonte Inc. (Business Number: 1000325899)

As per the requirements of the Act, Hörmann Oro-Medonte Inc. (formerly known as “TNR Doors,” “TNR”) 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, Hörmann Oro-Medonte 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.

Hörmann Oro-Medonte’s operational and business conduct is guided by our mission and core values, with a strong emphasis on integrity, accountability, transparency, and continuous improvement. These principles shape how we work with our customers, employees, and suppliers and reinforce our commitment to responsible business practices. This report, prepared in compliance with Bill S-211, outlines the strategies and actions implemented to identify, address, and mitigate the risks of forced and child labor within our supply chain and business operations.

Forced labor and child labor are in direct conflict with Hörmann Oro-Medonte’s mission, vision, and values. As such, Hörmann Oro-Medonte 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, Hörmann Oro-Medonte Inc. has been a trusted provider of cost-effective, custom-built rubber door systems. Based in Oro-Medonte, Ontario, Hörmann Oro-Medonte serves a diverse clientele both within Canada and internationally, including customers in the United States, Africa, and Mongolia.

Hörmann Oro-Medonte 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 Hörmann Oro-Medonte '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, Hörmann Oro-Medonte did not have formal policies or due diligence processes specifically addressing the risks of forced or child labor within its supply chain.

Nonetheless, Hörmann Oro-Medonte 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 labor.

Hörmann Oro-Medonte 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, Hörmann Oro-Medonte 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 Hörmann Oro-Medonte. Moving forward, we aim to collaborate with our vendors to proactively identify and address potential risks, including forced and child labor, and other unethical practices within our supply chain.

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

In addition, we will thoroughly investigate the situation and report it to the appropriate authorities, ensuring full compliance with all applicable laws and regulations. We are committed to transparency in these matters and will cooperate fully with legal and regulatory bodies to ensure those responsible are held accountable. Our commitment to ethical conduct includes actively supporting efforts to eradicate forced and child labor and implementing measures to prevent such violations from recurring.

3. Identification of Forced and Child Labour Risk

To better understand potential risks of forced or child labor within our supply chain, Hörmann Oro-Medonte 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 Labor's List of Goods Produced by Child Labor or Forced Labor.

The goal of this risk assessment is not to assume the presence of forced or child labor within our operations or supply chains. Rather, its purpose is to identify areas where these risks could arise, allowing Hörmann Oro-Medonte to take proactive steps to address and mitigate them. Given the

prevalence of forced and child labor 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 labor, 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

Hörmann Oro-Medonte has identified that its suppliers are located in four countries: Canada, the United States, Germany, and Belgium. The majority of Hörmann Oro-Medonte's procurement expenditure is concentrated in Canada, followed by the United States, Germany, and Belgium. According to the Walk Free Global Slavery Index (2023), these countries are among those with the lowest estimated prevalence of modern slavery globally and are characterized by relatively strong governmental responses. While no country is entirely free from risk, these jurisdictions are generally assessed as lower risk in terms of domestic prevalence.

Additionally, Hörmann Oro-Medonte reviewed data from the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor 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 labor. After completing this assessment, no products were found to have a significant risk of being associated with forced or child labor.

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

4. Remediation of Forced and Child Labour

Following a comprehensive analysis of our supply chain, Hörmann Oro-Medonte has not identified any instances of forced or child labor during the previous reporting year.

However, should Hörmann Oro-Medonte discover any occurrence of forced or child labor 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

Hörmann Oro-Medonte has not found any instances of forced or child labor 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 Hörmann Oro-Medonte were to identify any instances of forced or child labor 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, Hörmann Oro-Medonte did not conduct any mandatory or voluntary training sessions specifically related to forced and child labor, the organization's Code of Conduct, or the requirements of Bill S-211.

To strengthen awareness and support ongoing compliance efforts, training sessions were scheduled for 2026. At the time of preparing this report, the training initiative has been partially completed. Senior management, the purchasing team, and supervisors have participated in training sessions focused on understanding forced and child labor risks, supply chain responsibilities, and the requirements of Bill S-211. These sessions were conducted to raise awareness among employees and support the organization's commitment to ethical business practices and responsible supply chain management.

7. Assessing Effectiveness

Hörmann Oro-Medonte has been unable to fully assess the effectiveness of the measures implemented to address and manage the risks of forced and child labor during the previous reporting year.

Nevertheless, Hörmann Oro-Medonte 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 Hörmann Oro-Medonte has not yet incorporated specific measures for addressing forced and child labor into its formal policy framework, we are committed to tackling this critical issue. Forced and child labor affect over 24 million people worldwide, and Hörmann Oro-Medonte fully supports Public Safety Canada and its vision for combating these practices. Moving forward, Hörmann Oro-Medonte 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: Vice President of Operations

Date: 20MAY2026

Signature: 

I have the authority to bind Hörmann Oro-Medonte Inc.