



Insulated metal panel solutions | Walk-in coolers & freezers

Report pursuant to Act S-211 on the fight against forced labor and child labor in Supply Chains

Norbec is a North American leader in the manufacture of prefabricated cold rooms, doors, and architectural panels for building envelopes.

Mission: Our mission is to contribute to the creation of a sustainable world by manufacturing high-performance insulation solutions.

Vision: Norbec is committed to achieving sustainable growth by being a trusted partner and offering innovative solutions focused on our customers' needs. These objectives will be achieved through motivated employees and an unwavering desire to continuously improve everything we do

Purpose of this Report

In accordance with Bill S-211 (Act to Combat Forced Labor and Child Labor in Supply Chains), Norbec is publishing this report for its 2025 fiscal year (January¹ to December 31). The initiatives and policies included herein apply to all Norbec divisions, namely: Norbec Architectural Inc. (NAI), Norbec Systems Inc. (SNI), and Norbec Group Inc. (GNI).

Structure, Operations, and Supply Chains

Norbec operates two plants in Quebec and one plant in Ontario and had approximately 350 employees in 2025. Building envelope panels (NAI) are manufactured in St-Hyacinthe and Strathroy, Ontario, and cold room panels and doors (SNI) are manufactured in Boucherville.



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The company sells its products in the Canadian and U.S. markets, primarily in the following sectors: refrigerated warehouses, processing plants, commercial and institutional buildings, supermarkets, food service, and laboratories.

To learn more about Norbec's mission and activities, we invite you to visit our website [at www.norbec.com](http://www.norbec.com)

Supply Chain

The panels manufactured at Norbec are composed primarily of two raw materials: steel and polyurethane.

Steel: Steel is purchased primarily from Canadian manufacturers

Polyurethane: The components used in polyurethane come exclusively from American and Canadian manufacturers.

The suppliers we work with in these areas all adhere to ESG policies and demonstrate leadership in this field.

There were no changes in 2025 regarding the sourcing of raw materials; the supply chain remains the same. Overall, when considering the company's total purchases, more than 90% continue to come from Canadian and U.S. suppliers and manufacturers deemed to pose a low risk of forced labor and child labor.

Policies and due diligence processes regarding forced labor and child labor.

In 2025, Norbec began work on developing a responsible sourcing policy. A multidisciplinary working group was established for this purpose. The project is currently underway.

Risk Assessment and Management / Remedial Measures

In 2025, Norbec initiated a survey of its Tier 1 and Tier 2 suppliers to map its supply chain. The questionnaire sent to suppliers covered environmental aspects, risks related to forced labor and child labor, as well as geopolitical considerations. Work is currently underway.

Training and Awareness

In 2025, Norbec remained active in its development efforts, including by attending training sessions on responsible procurement delivered by ECPAR (Forum for Consultation on Responsible Procurement Practices).

Assessment of the effectiveness of measures

Norbec reserves the right to suspend or terminate the agreement with a supplier that fails to comply with the code of ethics.

Approval and Certification

In accordance with legal requirements, this report has been reviewed and verified by Norbec's executive body, which certifies that the content is accurate:



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Jan Lembregts
President & CEO

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

Frédéric Tanguay-Moncion
VP of Supply Chain & Digital
Transformation