

## Report on Risk of Forced and Child Labor 2024

Entity:	ATX Networks (Toronto) Corp
Reporting Year:	2023
Version:	1.0
Business Number:	853596427RM0001
Joint Report:	No
Categorization:	Entity
Sector:	Manufacturing / Broadband Access and Media Distribution Solutions
Location:	Toronto, Canada

ATX is focused every day on bringing our customers leading-edge solutions for their network access requirements & capabilities. Every second of every day, our market-leading and award-winning solutions shuttle more than 2,500 terabytes of data between smart devices and intelligent networks. ATX is teaming with the world's most innovative cable, satellite, fixed telecom, wireless and media broadcast service providers to usher in a new generation of ubiquitous gigabit broadband. Key to our mission are the values and competencies of our ATX team members.

ATX is a technology leader of Media Access Platforms, connecting smart devices to intelligent networks for the world's most admired cable, satellite, fixed telecom, wireless and media broadcast service providers.

With more than 7 million products deployed in 75 countries, ATX solutions delivers 2,500 terabytes of mission-critical content every second of every day. Our global, blue-chip customer base includes the largest cable multiple system operators (MSOs) and satellite operators to the smallest of regional cable operators, large enterprises, broadcasters, and telcos, as well as customers in sectors involving hospitality, education, healthcare, sports and entertainment, worship, retail, and government.

An agile, technology-driven company since 1985, ATX has been delivering disruptive, ground-breaking innovation that reduces complexity and optimizes performance for more than 30 years.

IV. Since our inception in 1985, ATX is a technology-driven company that has experienced rapid growth. We expanded our original focus on cable industry products to broaden our portfolio to include RF management, digital video, optical transport, and radio and satellite solutions. We successfully achieved this through extensive R&D, as well as through a series of acquisitions.

We operate across the globe, and our core facilities consist of five (5) key locations: Atlanta, GA, USA, San Diego, CA, USA and Pickering & Whitby (Toronto), ON, Canada. We have sales and customer facing team members in all major global geographies: APAC (Asia Pacific) CALA (Central and Latin America), EMEA (Europe, Middle East, & Africa), and North America (Canada & U.S.).

#### PREVENTION STEPS—Subsection 11(1)

In the previous financial year, 2023, ATX has taken the following steps to prevent and reduce the risk that forced labour or child labour used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by ATX:

- Developed and implemented an action plan for addressing social responsibility compliance, including forced labour and/or child labour practices.
- Developed and implemented due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains (see <https://atx.com/company/suppliers/>).
- Required suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.
- Developed and implemented anti-forced labour and/or -child labour contractual clauses.
- Developed and implemented anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists.
- Auditing suppliers for social responsibility policies, practices, and processes.

#### OPERATIONS—Subsection 11(3)

##### Requirement (a) – Structure, Activities and Supply Chains

ATX Networks (Toronto) Corp is structured as a Canada Corporation, being the principal operating entity for ATX operations in Canada. The corporation is organized into functional departments (management, finance, engineering, operations, product management, sales, etc.). The company has less than 250 employees worldwide. ATX Networks (Toronto) Corp operates as part of the ATX family of companies, primarily accommodating legal jurisdictions in the markets in which it operates and does not control other entities in the group.

The supply chains for ATX are product-dependent, but are controlled with common agreements, policies, and procedures. For example, the purchase order terms and conditions we publish, along with the Supplier Code of Conduct specify how our suppliers must operate for all social responsibility objectives to be acceptable to ATX.

ATX has three primary product types:

**Outside-Plant Access Products (ATX-Designed).** ATX uses third-party contracted manufacturers (3PCMs) to implement ATX's designs. All Tier II sources of raw materials are purchased by the 3PCMs, with the same requirements and policies regarding social responsibility and Code of Conduct as if being purchased directly by ATX. Sources of raw materials are worldwide. ATX buys the certified finished ATX products only from the 3PCMs.

**Media Distribution Products (Integrated, Third-Party Designs).** ATX also takes advantage of products developed by experts in their fields for specific functions, rather than investing in research and development for similar products. Most Media Distribution products meet this description; there are some customizations to ATX specifications. We also expect these suppliers to adhere to our social responsibility and Code of Conduct policies. Most of Media Distribution's suppliers are in Asia (as they also use 3PCMs for their manufacturing, in many cases).

**Services.** The services required to integrate and install our complex systems is also part of our product offering to customers. When we use third-party installers, we monitor that they also follow our policies, as if they are, by extension, operating as ATX employees.

*Requirement (b) – Policies and Due Diligence Processes and*

*Requirement (c) – Forced Labour and Child Labour Risks*

ATX has grouped all its control and auditing of compliance activities for social responsibility within its Code of Conduct and the Purchase Order Terms and Conditions, which apply to all approved suppliers to ATX. ATX performs an exhaustive review of all new suppliers, assessing not only their business viability, but also their reputational standing regarding global social responsibility requirements. Once vetted and approved, ATX’s Code of Conduct and the Purchase Order Terms and Conditions govern their performance, which is evaluated by periodic audits.

Should a supplier fail to meet our requirements, we do manage performance through corrective actions to help return performance to acceptable levels. Further, should a supplier fail to recover, ATX will remove the supplier from the approved supplier status and secure similar products with an acceptable competitor.

*Requirement (d) – Remediation Measures*

Given the nature of the products and services that ATX sells to its customers—these products require high-technology fabrication infrastructure to manufacture—the evaluation and audits of suppliers in our supply chain are not themselves conducive to forced and/or child labor. That said, there is still some potential risk regarding minerals that may be used in components these suppliers purchase from Tier II and higher suppliers, which is not easily traceable by ATX. For example, Conflict Minerals often employ forced child labor to mine, but it is incumbent on the user of that raw material to certify that their resulting products don’t include these sources of raw materials, and they must certify up the supply chain to prevent these sources from being used. We demand by our Code of Conduct that our suppliers source from their suppliers responsibly and certify that they do so, checked by our audits.

Refer to Requirements (b) and (c) above for our remediation policy.

*Requirement (e) – Remediation of Loss of Income*

Not applicable. We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

*Requirement (f) – Training*

ATX requires employees engaged in contracting and/or purchasing decisions to train annually on established procurement policies, including those addressing social responsibility objectives, because this population of employees have direct influence over operations that have social responsibility risks. In addition, employees are required to review ATX’s Employee Code of Conduct.

<b>TITLE</b>	<b>DESC</b>	<b>WHO</b>	<b>WHEN</b>
Code of Conduct	Implementation of our core values	All Employees	Initial Hire and Annually
Purchase Order Terms and Conditions	Business terms, including requirements for social responsibility	All employees engaged in contracting and/or purchasing decisions	Initial Hire and Annually

<b>TITLE</b>	<b>DESC</b>	<b>WHO</b>	<b>WHEN</b>
Supplier Qualification and Maintenance	Approval process for new suppliers and qualification maintenance of all approved suppliers	All employees engaged in contracting and/or purchasing decisions	Initial Hire and Annually
Mutual Respect in the Workplace	Implementation of our core values; covers external relationships as well	All Employees	Initial Hire
Employee Manual	Implementation of our core values	All Employees	Initial Hire

*Requirement (g) – Assessing Effectiveness*

ATX does not have a process specifically for forced and/or child labor oversight. ATX performs Supplier Audits annually of its major suppliers. These audits cover all aspects of operations with these suppliers, including pricing, quality, delivery, financial viability, customer support, environmental compliance, and social responsibilities (including forced and/or child labor oversight).

ATTESTATION

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable 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.”

I have the authority to bind ATX Networks (Toronto) Corp.



MATT GRIMES  
 Senior Vice President, Global Operations

16 May 2024