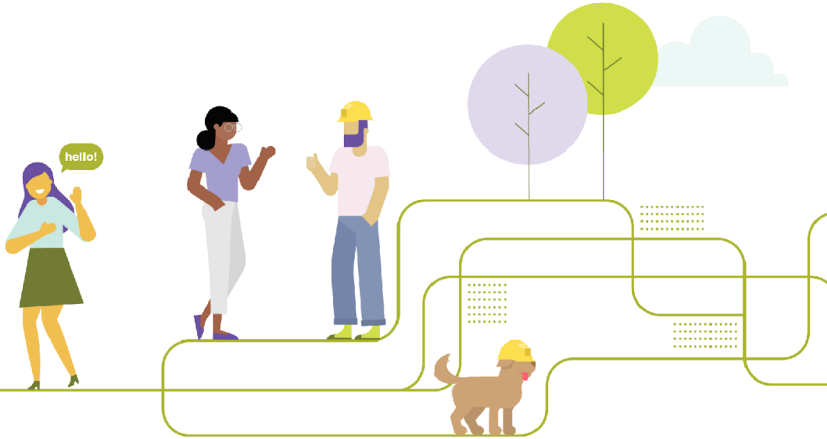




2023 Modern Slavery Report



For the year ending December 31, 2023

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1. Introduction

This report (the “Report”) is produced by Beanfield Technologies Inc. (“**Beanfield**”, “**organization**” or “**our**” or “**we**”) for the financial year ending December 31, 2023 (the “**Reporting Period**”) pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”).

This Report constitutes the first report prepared by the Corporation pursuant to Canada’s new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) and sets out the steps taken 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 or of goods imported into Canada by the organization.

The Report covers our in-scope Canadian operations and describes the actions we are taking to ensure that modern slavery is not taking place in our operations or supply chains.

2. Steps to prevent and reduce risks of forced labour and child labour

At Beanfield, we firmly believe that upholding human rights is not only a fundamental corporate responsibility but also a guiding principle that underpins every aspect of our operations. We prioritize the utmost respect for human rights in all our business activities, regardless of location or context. Furthermore, we hold our business partners to the same high standards, expecting them to share in our commitment to ethical practices and human dignity.

3. Structure, activities, and supply chains

Founded in 1988, our mission has always been simple yet profound: to create better-connected communities. From our humble beginnings in Toronto, our presence has now expanded across Ontario, Montreal, and Vancouver.

Beanfield is a privately owned company, supported by a consortium of digital infrastructure investment firms, and we proudly stand as an independent facilities-based telecommunications provider with headquarters strategically located in Toronto, Montreal, and Vancouver. As an independent fibre network operator, we provide internet, phone, and television connectivity for business and residential customers in large Canadian urban centers. Operating one of the largest privately-owned fibre-optic networks in Canada, we deliver top-tier business and residential internet, phone, and TV services, cementing our role as a cornerstone of connectivity in the regions we serve.

The principles of connectivity and community are deeply embedded in our culture and guide us in every way. These values shape the way we build and deliver services over our extensive fibre-optic network and drive our unwavering commitments to sustainability, inclusion, and community engagement. We are dedicated to making a positive impact, not only through superior technology but also through meaningful contributions to the communities we call home.

To maintain our high standards, Beanfield partners with well-established, industry-leading suppliers for our fibre, equipment, and technology needs. Our Code of Conduct ensures that these suppliers adhere to the same standards of excellence and integrity that we expect from all Beanfield employees. This commitment to quality and ethical practices ensures that every aspect of our operations, from supply chain to service delivery, reflects our dedication to building better-connected, thriving communities.

While some may raise concerns about sourcing from regions with varying economic conditions or differing regulatory environments, Beanfield addresses this issue directly. Through our supplier selection process and adherence to ethical practices, we mitigate risks associated with sourcing materials and equipment. We hold our suppliers accountable for their compliance efforts, reinforcing our dedication to quality and integrity in all facets of our business.

By developing strong, ethical partnerships, we are able to deliver exceptional service quality and technological innovation. This dedication to excellence and integrity reinforces our commitment to building better-connected, thriving communities. Our suppliers play a critical role in our success, and we are proud to collaborate with partners who share our vision for a connected, inclusive, and sustainable future.

4. Policies, Governance and Due Diligence processes

Code of Conduct: Beanfield is unwavering in its commitment to operating with the highest ethical standards and in full compliance with all applicable laws, rules, and regulations. We place the utmost value on the integrity of each employee and Company representative, recognizing that their conduct reflects on the entire organization. Our dedication to ethical behavior is non-negotiable, and we expect every member of our team to uphold these principles diligently. Compliance with all relevant laws, rules, and regulations is not just expected but is a fundamental responsibility of every employee. By adhering to these standards, we ensure the trust and respect of our clients, partners, and the wider community, solidifying our reputation as a principled and reliable company.

Recruitment Policy: Beanfield is committed to equal opportunity and fair hiring practices, ensuring that all positions are filled based on the merit of each candidate's knowledge, skills, abilities, and other competencies. This policy is designed to maintain a consistent, fair, and barrier-free approach to employment, ensuring that every employee and potential candidate is

given a fair chance. To create and maintain a safe and inclusive work environment, Beanfield strictly adheres to a policy of not employing individuals under the age of 18. This measure underscores our dedication to safeguarding the well-being of our workforce and upholding the highest standards of safety and ethical conduct. Our hiring processes reflect our commitment to these principles, striving to attract and retain the most qualified individuals who align with our values and contribute to our collective success. By fostering an equitable and supportive work environment, Beanfield not only complies with legal standards but also champions a culture of respect and excellence.

Respectful Workplace: At Beanfield, we uphold a zero-tolerance policy against bullying, harassment, or any inappropriate comments or conduct that can reasonably cause a person to feel humiliated, intimidated, or embarrassed. This policy applies to everyone, regardless of their position within the company. Demonstrating mutual respect is not just encouraged but is a fundamental core value and essential work expectation at Beanfield. We are committed to fostering a respectful and inclusive environment where all employees feel safe and valued. Any breach of this policy will be addressed promptly and with the utmost seriousness to maintain the integrity and well-being of our workplace.

Integrity Hotline Policy: Beanfield is committed to behavior that is lawful, ethical, and true to our word. Our Directors, Officers, Employees, and Contractors must act in accordance with the letter and spirit of applicable laws, regulations, policies, and Beanfield's public statements. Exemplifying a high standard of business and personal ethics in the conduct of our duties and responsibilities is not only mandatory for all roles, it is also how it should be. The Integrity Hotline Policy is designed as a mechanism for Beanfield's people to report what they believe, in good faith, to be a material violation of laws, regulations, policies, public statements, or ethics. It ensures the receipt, documentation, retention of records, and resolution of reports received under this Policy and protects whistleblowers from retaliation.

Policy on Forced and Child Labour: Beanfield maintains a zero-tolerance approach to forced and child labour regardless of with whom we work and where we do business. We are committed to complying with all relevant laws concerning forced and child labour in all the countries where we operate and to preventing forced and child labour throughout our network of suppliers. We expect our suppliers to take all reasonable steps to prevent and remediate the use of forced and child labour within their supply chains, both directly and indirectly. Should credible concerns be reported in good faith or if the presence of forced or child labour is identified in a current or potential supplier's supply chains, we will conduct a thorough assessment of our collaboration with that supplier.

5. Assessing and managing our risk

Internal: We believe that the risk of forced labour or child labour among our personnel is negligible. Our Vice President People and Culture along with the rest of our Executive Leadership Team oversee the application of our human resource policies. Our recruiting processes ensure compliance with the standards currently in force in Canada, where most of our personnel come from. We also recognize our personnel's right to freedom of association.

Within Our Supply Chain: We are aware that there may be a risk of forced labour at all levels of our supply chain. When it comes to our industry, we assess the risk of forced labour or child labour as being minimal in terms of our direct suppliers. Identifying the risk for indirect suppliers over which we have little control and visibility can prove to be complex, and we continue to make reasonable efforts to understand this.

The supply of goods and services is governed by a certain number of operating philosophies and principles that guide our strategies and practices and which are consistent with our growth plan. All members of our supply chain also have a role to play in that regard. We rely on the cooperation of all our suppliers and expect them to meet the highest standards of quality and ethics, as defined in our various policies and codes of conduct.

6. Remediation Measures

Currently, we have not identified any incidents of forced labor or child labor within our activities or supply chain. Consequently, we have not needed to take any remedial measures regarding such incidents. However, should we ever discover instances of forced labor or child labor, we are fully prepared to implement appropriate remediation strategies. These strategies will be carefully designed and executed in compliance with international standards and best practices. Our commitment to ethical labor practices is unwavering, and we continuously monitor our operations and supply chains to ensure they remain free from these serious violations. We are dedicated to maintaining a responsible and humane work environment, and we will act decisively to address any issues that may arise in this regard.

7. Training

At Beanfield, we prioritize continuous education and awareness among our employees to uphold our high standards of conduct and ethics. To ensure comprehensive understanding and adherence to our policies, all new office employees are assigned a mandatory onboarding training package. This package includes detailed training on our Code of Ethics, which lays the foundation for our corporate culture and operational integrity.

Furthermore, we reinforce this commitment by requiring all office employees to annually certify their compliance with our Code of Ethics. This annual certification serves as a reaffirmation of their understanding and commitment to our ethical standards, ensuring that our principles are consistently applied throughout the organization.

Although we currently do not provide specific training on forced labor and child labor, we recognize the importance of addressing these critical issues. We are actively working to develop targeted training programs that will cover these topics in depth. Our goal is to equip employees with the knowledge and tools they need to identify and prevent any instances of forced or child labor within our operations and supply chains. By doing so, we reinforce our commitment to ethical practices and the protection of human rights at every level of our business.

8. Assessing effectiveness

While we are confident that we have managed risks to the best of our ability in a reasonable manner, we acknowledge that this is an ongoing journey requiring continuous improvement. We are committed to evolving and enhancing our practices to ensure the highest standards of integrity and responsibility.

For the next calendar year, we are planning several key initiatives to strengthen our efforts in this area:

- Develop a Policy on Forced and Child Labour: We will establish a formal policy that clearly outlines our stance and procedures regarding forced and child labor, ensuring stringent safeguards against these practices.
- Build a Comprehensive Supplier Code of Ethics: We will create and distribute a robust supplier code of ethics to all our vendors, setting clear expectations for ethical behavior and compliance with our standards.
- Deliver Comprehensive Training: We will provide extensive training to all Beanfield employees on these new policies and procedures. This training will ensure that everyone is well-informed and equipped to uphold our standards.
- Integrate into New Employee Orientation: We will make these topics an integral part of our new employee orientation program and update our employee handbook accordingly. This ensures that all new hires are immediately aware of and committed to our ethical standards.

Beanfield is also committed to assessing the effectiveness of these initiatives at a later stage. We will evaluate our progress in preventing and reducing the risks of forced labor and child labor within our activities and supply chains, making adjustments as necessary to continually improve our impact and uphold our commitment to ethical practices.

9. Approval & Attestation

This report was approved by the Board of Directors of Beanfield for the year ending December 31, 2023, in accordance with subparagraph 11(4)(a) of the Act. In accordance with the requirements of the Act, and in particular section 11 thereof, I hereby attest that I have reviewed the information contained in the report for the entity listed above. To the best of my knowledge, and after having exercised due 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 listed above.

I have the authority to bind Beanfield Technologies Inc.



Per: _____

Full Name: Jenine Krause

Title: Board Director, Beanfield Technologies

Date: May 28, 2024

