



Belden Inc. Modern Slavery Report

Filed on behalf of Belden Inc., Belden Canada ULC (BN 748125275), and PPC Broadband Inc (BN 896634482).

Per the interpretations listed in Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), Belden Inc., Belden Canada ULC, and PPC Broadband Inc. are entities that must file a report on our supply chain activity as required by the Act. As discussed in this report, the steps Belden took to reduce the risk of forced or child labour in its supply chain in 2023 included internal trainings for Belden associates involved in our procurement practices, requiring suppliers to attest to our Supplier Code of Conduct, and offering trainings to certain external suppliers that includes ESG topics and responsible business practices.

I. Structure, activities and supply chains

Belden Inc. is the worldwide parent and controlling entity of the Belden group, which includes Belden Canada ULC and PPC Broadband Inc., among others (collectively, “Belden”). Belden is a leading global supplier of network infrastructure and digitization solutions. Outside of our Canadian operations Belden has a global presence with over 8,000 employees worldwide spread amongst Belden Inc. and its subsidiaries. Belden is a Delaware corporation with global headquarters located in St. Louis, Missouri, USA. Belden’s fiscal year runs January 1 – December 31.

Belden Canada ULC is a Canadian manufacturer of wire and cable products. The Canadian operations is headquartered at 130 Willmott Street in Cobourg, Ontario where our Canadian manufacturing activities occur, along with procurement and financial operations for the entity. Belden Canada also has a research and development facility located at 2310 Alfred Nobel Blvd in St-Laurent, Quebec. The total number of employees across Canada is 269.

PPC Broadband Inc. is the legal entity through which Belden operates most of its broadband business. PPC is a Delaware corporation located in Syracuse, NY, and it sells products into Canada.

Belden’s goods are sold to customers within Canada, primarily through Belden Canada ULC. Belden Canada ULC also manufactures products for sale and distribution in Canada and outside of Canada at its Cobourg, Ontario facility. Over 80% of Belden Canada ULC’s exports are to Belden entities and customers in the United States. These exports are generally shipped to one of the two U.S. distribution centers that operated by Belden Inc., one in Richmond, Indiana and the other in Tucson, Arizona. The Richmond facility is considered a hub where many other organizational functions occur.

Belden Canada ULC is a large volume importer with approximately 20,000 imports coming in each year. These are predominately shipped from our Richmond, Indiana and Tucson, Arizona distribution centers, however some come from other Belden entities in the US. Belden also has two manufacturing facilities in Mexico, one in Tijuana and the other in Nogales, that transfer manufactured goods to bonded facilities within the US for furtherance to Canada to fulfill orders in Canada. Most of these are sales orders being fulfilled and drop shipped directly to our customers warehouses from the shipping point. The remaining volume is mostly to support our manufacturing and R&D operations. Belden Canada ULC does occasionally source globally depending on need but that is infrequent and most of our raw material, machinery and parts are sourced from US companies.

II. Policies and due diligence processes

At an enterprise-wide level, Belden is dedicated to serve the needs of our customers and improve the communities where we live and work. Belden has a responsibility to make a positive, meaningful impact on the world around it, which is why we are firmly committed to responsible environmental, social, and governance practices. These ESG responsible

ESG practices include, but are not limited to, ensuring that Belden and its supply chain engage in responsible labour practices. Annually, Belden publishes an ESG report outlining our commitment to responsible ESG practices (the 2023 version of the report can be accessed [here](#)). Additionally, Belden is also a member of the UN Global Compact which requires businesses to adopt sustainable policies and report on their implementation, the Responsible Business Alliance, the responsible Minerals Initiative, the Responsible Labor Initiative, and the Responsible Factory Initiative.

Belden's Supplier Code of Conduct (the "Code") outlines clear expectations for upstream supply chain partners and invites them to participate in our commitment to work responsibly and our suppliers are expected to comply fully with all international laws and regulations around the world. The Code is based on industry and internationally-accepted principles such as the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and European Directive on Corporate Due Diligence Obligations in Supply Chains.

Our vendors are required to sign a declaration relating to the Code, which covers forced & child labour on an annual basis. Vendors that do not comply with this requirement risk being terminated by Belden or facing other adverse actions. In addition, suppliers receive ESG surveys that need to be completed and submitted to Belden. These surveys include and are not limited to child and forced labour materials. In 2023, 84% of Belden's assessed suppliers have confirmed compliance with the Code or have provided an equivalent to our Code from their organization.

Finally, Belden maintains and publishes a formal whistleblower policy that allows anyone to anonymously alert Belden's management or its Board of Directors of any unethical or illegal business practice, including the use of forced or child labour.

III. Risk of Forced or Child Labour

Through our due diligence efforts to date, Belden has not identified significant risks of forced or child labour being used in its supply chain. However, Belden recognizes that parts of its supply chain are exposed to countries where there is increased risk of forced labour or child labour. As stated above, Belden surveys its suppliers annually to ensure compliance with appropriate ESG practices, including labour practices, and will not hesitate to take appropriate action against any supplier found to fall short of Belden's expectations.

Belden's ESG policy is in place to ensure that we adhere to responsible and ethical practices in the conduct of our business. As mentioned in the above paragraphs, Belden's ESG commitments are published on our website and we take steps to ensure our suppliers and vendors complete and sign a code of conduct along with a survey to confirm they are not supplying products derived from forced/child labour or otherwise engaging in unethical labour practices.

IV. Remediation measures

To date, Belden has not identified the use of forced or child labour in its own practices or in its supply chains. In the event that a good in our supply chain is alleged to benefit from forced or child labour, our Global Trade Compliance Team and Legal Department would investigate the matter and, if substantiated, take appropriate action involving the relevant supplier, which may include termination of the supplier and notifying relevant legal authorities in the appropriate jurisdiction.

V. Remediation of loss of income

Belden has not yet identified any instances of loss of income of the vulnerable families as a result of the steps Belden has taken to eliminate risks of Forced Labor. For this reason, no remediation measures have been necessary.

VI. Training and Assessed Effectiveness

Belden associates in global procurement and supply chain functions are trained annually through Belden's Responsible Procurement Training Program to ensure that they are up-to-date and aware of our responsible sourcing policies and sustainability requirements, which include items related to fair labour practices. Their participation in those trainings is monitored by Belden to ensure attendance and completion. Eight-eight percent of Belden associates in global procurement and supply chain roles completed the training in 2023, and the training was made available for on-demand viewing for Belden associates.

Belden also held external optional trainings on ESG topics with key third party suppliers.

Belden believes these trainings are crucial, as they equip our internal teams and external partners with essential and relevant ESG information, including on responsible sourcing practices.

No actions have yet been taken to measure and track the success of our efforts to prevent and reduce the risks of the use of forced and child labour in our activities and supply chain.

Attestation and Approval of Report

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Belden Inc.

In accordance with the requirement 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 due diligence, I attest that the information on 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: Brian Edward Anderson

Title: Senior Vice President – Legal, General Counsel and Corporate Secretary

Date: May 30, 2024

Signature:



I have the authority to bind Belden Inc.