



2023 Forced and Child Labour Report

This Report, published in compliance with the Canadian “*Fighting Against Forced Labour and Child Labour in Supply Chains Act*”, sets out the actions that DATA Communications Management Corp (“DCM”) has taken to prevent, and address forced and child labour in our business and supply chains. DCM has a zero-tolerance policy for any form of forced and child labour in our operations and supply chains. The Report covers the activities of DCM for the calendar year 2023 through to May 2024.

Introduction

DCM does not tolerate the use of forced or child labour. We respect and comply with all applicable laws in the countries in which we operate as they relate to these issues, and as they relate to freedom of association and the right to collective bargaining.

Our business and supply chain

DCM is a marketing and business communications partner that helps companies simplify the complex ways they communicate and operate, so they can accomplish more with fewer steps and less effort. DCM serves major brands in key vertical markets, including financial services, retail, healthcare, energy, other regulated industries, and the public sector. We integrate seamlessly into our clients’ businesses thanks to our deep understanding of their needs, our use of technology-enabled solutions, and our end-to-end service offering. Whether we are running technology platforms, sending marketing messages, or managing print pieces, our goal is to make every interaction with us “surprisingly simple”. We serve our clients through the following primary solutions:

- Print and communications products and services, and related offerings
- Technology-enabled subscription services and fees
- Technology-enabled hardware solutions
- Marketing and other services

We operate 19 facilities across Canada and in the State of Illinois, and we employ approximately 1,800 people.

Policies and due diligence processes

We believe it’s possible to be profitable and have a positive impact on the planet. We believe corporate responsibility isn’t just the right thing to do—it also makes good business sense.

Together, we are working to transform the way we do business to ensure strong ESG practices are ingrained into how we operate. Our platform focuses on three key areas: *reducing the impact our facilities have on our planet and ensuring they are safe places in which to work; improving quality of life for our people and society at large; and holding ourselves to rigorous—and transparent—standards.*

We have established the following policies which guide and support our commitment to sustainability, corporate responsibility and human rights.

1. Employee Handbook

Our Employee Handbook sets out guidelines for employees to promote a respectful, ethical, diverse, and dynamic workplace. It sets out general policies and procedures, security policies, health and safety policies, details DCM's commitment to the environment, business conduct, and ethics and privacy. DCM has zero tolerance for harassment and workplace violence of any kind.

2. Workplace Anti-violence, Harassment & Sexual Harassment Policy

Our Workplace Anti-violence, Harassment & Sexual Harassment Policy details DCM's commitment to providing a workplace that is free from intimidation, harassment, sexual harassment, and violence to both staff members and clients. The Policy outlines the types of behaviors that constitute violations of the Policy and it applies to all DCM employees, customers, consultants and suppliers. The Policy also outlines the responsibilities of management and employees in ensuring adherence to the Policy, including guidelines on filing a complaint.

3. Supplier Code of Conduct

The DCM Supplier Code of Conduct sets out the core principles and standards that we expect our suppliers to adhere to while conducting business with DCM. This aligns with international human rights norms and Canada's Bill S-211. The Code explicitly prohibits the use of forced or child labour at any stage of production. It also requires suppliers to pay workers fairly, according to the relevant laws, and to have clear and transparent disciplinary policies. Our Supplier Code of Conduct is incorporated into supplier agreements to ensure that the Code has a legal binding force on applicable suppliers with whom an agreement is executed.

We expect all our suppliers to comply with the laws and regulations of the countries where they operate, and to conduct their business in an ethical, socially and environmentally responsible manner, consistent with DCM's expectations.

4. Sustainable Procurement Policy

DCM recognizes the critical role businesses play in addressing environmental and social challenges. As part of our commitment to corporate responsibility, our sustainable procurement policy has been established to guide the procurement practices of products and services across DCM locations. Our aim is to contribute to the preservation of the environment, support ethical and socially responsible practices, and positively impact the communities in which we operate. This Policy applies to all employees and suppliers involved in the procurement process, outlining the guiding principles in our contracts and procurement practices.

As part of the procurement process at DCM, employees are expected to ensure that suppliers respect and uphold human rights throughout our supply chain. This includes avoiding suppliers in exploitative practices and human rights violation, such as child labour and unsafe working conditions.

5. Health and Safety Policy

All employees are required to adhere to DCM's policies and safety procedures contained in our Health and Safety Policy. DCM supervisory staff are required to instruct, and train our employees in safe work practices, ensuring that all employees work safely and are aware of relevant legislation and company safety policies. Employees, supervisory staff, management, health and safety committee members have a role to play in promoting a safe workplace.

6. Whistleblower Policy

DCM is committed to integrity and ethical behavior in the workplace and will foster and maintain an environment where employees can work safely and appropriately, without fear of retaliation. Our Whistleblower Policy describes the process for reporting complaints of wrongdoings or concern in the workplace. This reporting mechanism is accessible to all employees and provides protection in two important areas - confidentiality and against retaliation.

We conducted spot checks and a marketing campaign when the Whistleblower Policy was rolled out to employees informing them of the anonymous and independent reporting supported by the policy. So far, DCM has not received a report on human rights violations, including forced and child labour.

We are committed to reviewing our policies and procedures regularly, and to updating them as needed to ensure our continued support of applicable laws and regulations.

Forced labour and child labour risks

Suppliers are required to adopt or establish risk assessment and management systems before engaging in work with DCM. The risk assessment and management process intend to provide transparency into the environmental, health and safety, social and labour practices, as well as ethical risks associated with supplier's operations and supply chain.

Our supplier qualification questionnaire includes a dedicated section on risk assessment and management. The sustainability / ESG section of the questionnaire investigates issues on a supplier's environmental management system, environmental performance (e.g. resource extraction and use), and occupational health and safety management. It also includes sections to ensure that suppliers have a process in place to ensure compliance with internationally recognized human rights standards, legislation and conventions.

DCM is currently undergoing an independent third-party supplier risk assessment to understand supplier relationships, locations, and the risk profile of our existing supply chain. This analysis covers goods where DCM is the importer of record into Canada and is based on import data from 2023 across DCM's three entities.

We will build on our risk assessment process, particularly our supplier qualification questionnaire, to incorporate specific aspects of the *Canadian Forced and Child Labour Act*. We will also consider expanding on our current risk assessment process to build a more comprehensive understanding of areas of risk as related to areas of risks of forced and child labour across our business and supply chains.

Remediation measures

To date, DCM has not received any reports related to human rights violations, including forced and child labour. Regardless, we remain committed to addressing and remedying any issues of forced and child labor should they arise in our operations or supply chains. To this end, we will work to develop an internal governance structure specifically related to forced and child labour incidents and will develop appropriate remediation processes to address any future incidents related to this issue in our business or supply chains.

Training

DCM values the learning and development of our employees. We offer a variety of training courses through our internal training platform, which provides up-to-date and relevant training on various topics. We track

and monitor the completion of training courses electronically. In addition to the training provided for our employees, we provide Buyer's training in Sustainability and ESG which covers topics such as ESG frameworks, scope 3 emissions, and the basics of GHG emissions.

In 2024, DCM is committed to expanding the training offered to employees to include training specific to the issue of forced and child labour. We will look at several options to understand the best way to upskill employees and then assess if there are third parties whom we should include in this training going forward.

Assessing effectiveness

We will continue to assess the effectiveness of our policies and processes to address the risks of forced and child labour across our business and supply chains. We are committed to transparency and accountability in this process and will report on our progress to our stakeholders.

Future plans

We are dedicated to working collaboratively with our suppliers, customers, and other stakeholders to address any issues of forced and child labour that may arise. We will work to continuously improve and enhance our policies and procedures in compliance with applicable laws and regulations. In line with this commitment, we will undertake the following plans in 2024:

- Publish DCM's first ESG report in 2024
- Enhance our governance structure and update appropriate DCM policies to address risks of forced and child labour across our business and supply chains.
- Provide upskilling and awareness sessions to employees on the requirements of the Act, including the risks of forced and child labour.
- Enhance our risk assessment process, particularly our supplier qualification questionnaire, to incorporate specific aspects of the Act.



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President and Chief Executive Officer
May 23, 2024