



Report on Fighting Against Forced Labour and Child Labour- 2023

Glentel Inc. and its Business Units

This report is made on behalf of Glentel Inc. (“Glentel”, “we”, “us”, “our”) pursuant to Section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) covering our most recently completed fiscal year from January 1, 2023 to December 31, 2023 (the “Reporting Period”).

We do not tolerate, nor will we tolerate, forced labour or child labour in our organization or with any member of our supply chain. We expect all directors, officers, and employees of Glentel to abide by our values and code of conduct and to act with integrity and comply at all times with all laws, regulations and rules that apply to us in the jurisdictions where we operate. Correspondingly, we seek to ensure that our suppliers have adequate controls in place to eliminate the risk of forced and child labour from their operations and supply chains.

Glentel’s Business Units

Glentel is one of Canada’s largest multi-carrier retailers of wireless telecommunications services and products. Headquartered in Burnaby, British Columbia, and with our workforce of approximately 1700 employees, we operate 336 retail stores across Canada under the following banners:

Wirelesswave/Wave Sans Fil, Tbooth wireless/la cabine T sans fil, and Wireless etc./Sans-fil etc. We offer consumers a choice of cellular brands including Rogers, Bell, Fido, Virgin, Chatr Wireless, Lucky Wireless and SaskTel, through retail locations in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Quebec, New Brunswick, Nova Scotia, and Newfoundland.

Glentel’s Legal and Organizational Structure

Glentel is owned equally by Rogers Communications Inc. and BCE Inc. The Board of Directors of Glentel has established clear oversight of our corporate responsibility programs and our environmental, social and governance (“ESG”) activities.

Risks of Forced Labour and Child Labour in Glentel’s Activities and Supply Chain

We consider there to be a limited risk of forced and child labour occurring in our business activities because we operate exclusively in Canada where there is a low prevalence of forced and child labour, and we are governed by the applicable federal and provincial employment standards, in addition to our corporate policies and procedures that govern working conditions and the ethical treatment of our employees.

As a wireless retailer, Glentel procures a large number of products and services from limited categories, namely mobile phones and accessories for mobile phones (such as cell phone cases, screen protectors, wireless chargers and cables, power banks, wireless headphones and Bluetooth devices). Products in these categories are predominantly manufactured and assembled in China where protections for workers may not match those we practice in North America, and may be at higher risk of involving forced and child labour. Of the units of mobile phones we purchased in 2023, 99.6% were from large well-known providers who are members of the Responsible Business Alliance (“RBA”), are members of RBA’s Responsible Labour Initiative, and have signed RBA’s Code of Conduct, which prohibits the use of forced and child labour. Of the units of our mobile phone accessories purchased in 2023, 96% were from large well-known providers who also have reporting obligations under the Act.

Our review of the various guidance resources available has identified potential risks of forced labour or child labour in our supply chain, as described above. Nevertheless, we assess the risk to be limited because the goods we purchase are predominantly from large, reputable suppliers, the great majority of whom, by volume of goods supplied to us, voluntarily adhere to the RBA’s code of conduct or to their own company code prohibiting the use of forced or child labour.

Glentel’s Policies

Glentel has a set of corporate policies that provide guidance for employees regarding expectations for conduct, and adherence to the organization’s procedures and standards.

Glentel’s Code of Conduct (the “Code”) provides the framework for employee conduct and is intended to maintain and build our reputation in the community as a fair and ethical corporate citizen. The Code applies to all Glentel employees, officers, directors, consultants and contractors.

We are also committed to sourcing responsibly and expect our suppliers to comply with all laws and applicable international standards related to labour, human rights, health and safety, data privacy and security, and the environment.

Glentel’s Due Diligence Process

To address the risks of forced and child labour in our supply chain, we recently mapped our supply chains to assess risks and we carried out a prioritization exercise to focus due diligence efforts on elements carrying the highest risk.

Glentel’s Training

While no targeted training on the subject of forced labour and child labour was delivered in the Reporting Period, all new employees are required to review the Code on the first day of their employment with Glentel.

Glentel’s Remediation Measures

We did not identify any instances of forced labour or child labour in our supply chains during the reporting period and, therefore, no remedial measures were taken, including those relating to remediating the economic impact on the most vulnerable families.

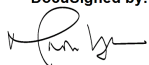
Glentel's Effectiveness

We have not yet assessed the efficiency of the measures that we have in place. However, Glentel's corporate governance process requires management to report to the board on ESG risks such as forced labour or child labour.

Approval

This report was approved by the Board of Directors of Glentel Inc. on May 24, 2024, for the financial year ending December 31, 2023, in accordance with subparagraph 11(4)(b)(ii) of the Act.

Signed by:

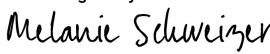
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Marisa Wyse

Director, Glentel Inc.

I have the authority to bind Glentel Inc.

5/24/2024

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Melanie Schweizer

Director, Glentel Inc.

I have the authority to bind Glentel Inc.

5/24/2024