

# Fighting Against Forced Labour & Child Labour in Supply Chains Report

March Networks Corporation May 28, 2024

## Scope of Report

This report applies to every wholly owned entity of March Networks Holdings Ltd. and entities over which March Networks Holdings Ltd. has control, including the reporting entity March Networks Corporation.

Representatives from each entity covered by this report were consulted in developing the report, in order to ensure consistency in our policies and standards, due diligence programs, and approach to mitigating forced labour and child labour risks in our operations and supply chain.

This report is issued in compliance with the Fighting Forced Labour and Child Labour in Supply Chains Act, and serves as our disclosure for the fiscal year ending December 31, 2023. The report outlines the steps we have taken to prevent, identify, and address forced labour and child labour risks across our business and supply chain.

# **Organization Background**

Founded in 2000, March Networks Corporation is a global leader in intelligent IP video surveillance products and solutions for businesses including retailers, banks, transit agencies and more. Headquartered in Ottawa, Canada, with regional offices worldwide and sales teams on every continent, March Networks helps organizations realize the true power of integrated data and video. Our heritage in networked video, coupled with our strong focus on quality and reliability, has allowed us to maintain our position as an industry leader in the video surveillance market.

As a leading provider of IP video software and systems, we work with certified partners and customers worldwide to transform video into usable business intelligence. We give them the tools they need to enhance security, mitigate risk, and reduce losses from theft and fraud. We then deliver on the true power of video with integrated applications that let them see what is happening in their organization and make informed decisions to improve performance and profitability.

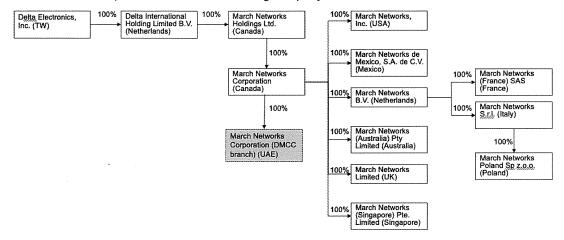
As of December 31, 2023 March Networks Corporation employed 154 employees in Canada, and its affiliates employed 143 employees outside of Canada.

March Networks Canadian operation is based in Ottawa ON. The focus of the Canadian operation is primarily R&D, Operations, Services, Marketing and FG&A.

March Networks solutions are primarily developed in Canada, Italy and Poland. March Networks uses contract manufacturers in Canada and Thailand to manufacture its proprietary products. March Networks Corporation also procures branded products from ODM manufacturers located in Taiwan and Vietnam. March Networks products are primarily distributed out of the United States and Italy. March Networks Corporation will import into Canada goods manufactured outside of Canada. March Networks Corporation will distribute products within Canada and occasionally export products from Canada.

## **Corporate Structure**

March Networks Corporation is a part of the Delta Group. March Networks Corporation is a wholly owned subsidiary of March Networks Holdings Ltd. March Networks Holdings Ltd. is incorporated under the Canada Business Corporation Act and is a holding company.



## **Supply Chain**

March Networks purchases products such as custom assemblies, ODM/OEM products, and contract manufactured goods from domestic and international suppliers. We work with more than 80 direct suppliers in over 9 countries, encompassing suppliers of all sizes, from SMEs through to global multinationals. Our supply chain includes commercial raw material suppliers, contract manufacturers, logistics providers, ODM(Original Design Manufacturer)/OEM (Original Equipment Manufacturer) suppliers, custom assembly suppliers & distributors. Our largest procurement categories in fiscal year 2023 were ODM, contract manufacturers & OEM and our main countries of supply were Taiwan and Thailand.

March Networks has two distinctly different supply chains for our products:

- a) Outsourced Manufacturing for March Designed Equipment. Our outsourced electronic supply chain involves the delegation of various stages of the production and distribution process of product to our contract manufacturers. This includes sourcing raw materials, manufacturing components, assembling products, and distributing them to our customers. Uniquely though, March Networks does not delegate the selection of the suppliers to the contract manufacturers, the procurement of materials is directed by our approved manufacturer list and catalog in Agile. This allows March Networks to engage with the suppliers in all aspects of the materials, ie: price, quality, leadtime etc.
- b) Direct Buying of ODM/OEM products. Essentially what this means is, March is purchasing products directly from the manufacturer and reselling. March is very involved in many aspects of the design of the ODM portfolio, less so with OEM products. Our ODM/OEM suppliers are a carefully managed relationship that includes quality assurance processes & all aspects of logistics.

# Policies and Due Diligence Processes

March Networks has adopted a series of core policies that communicate our position on forced labour and child labour and explicitly prohibit their use in our operations and supply chains.

All March Networks employees are required to comply with our Business Code of Conduct and complete annual training regarding our Code of Conduct. As of January 1, 2024 our Code of Conduct training includes a module regarding forced labour and child labour. The Code of Conduct and training set clear expectations, define desired behavior for our employees and help us monitor compliance with our standards.

All suppliers of goods and services with whom we do business are required to comply with our Supplier Code of Conduct (SCoC). Our SCoC is based on recognized international human rights standards, and it outlines the expectations we have of our suppliers on labour practices, health and safety, ethics and anti bribery and anti corruption and conflict minerals.

Compliance with the SCoC is a condition of our supplier contracts, and suppliers are expected to agree to abide by its contents and to communicate the SCoC and all other relevant policies to their own suppliers.

## Internal Responsibility

March Networks Corporation management plays an essential role in guiding our approach to sustainability, including on issues related to the prevention of forced labour and child labour. We have established a cross-functional ESG team which is responsible for implementing our human rights commitments, including in relation to child labour and forced labour. This team is led by Chief Legal Officer, who has day-to-day responsibility for ESG issues such as climate impacts, responsible sourcing and human rights. This team ensures March Networks Corporation's expectations are communicated to employees and suppliers. In the future, this team will ensure that relevant staff who select and interact with suppliers, including procurement teams, contract managers and purchasing staff, receive training on how to identify, prevent and address risks of forced labour and child labour in the supply chain.

## **Supplier Vetting**

Prior to on-boarding, March Networks vets new suppliers' conformance to our SCoC.

#### **Contractual Clauses**

One of the key ways in which March Networks articulates our expectations regarding the SCoC and compliance with laws in our supply chain is through our contracting process with our direct suppliers. At present our supply contracts include express provisions regarding compliance with the SCoC and applicable laws. In the future, we will incorporate specific provisions on human rights, including the prohibition of child labour and forced labour, into procurement contracts and terms of business.

## Forced Labour and Child Labour Risks

We recognize that in certain countries and certain industries, there is a greater risk of forced labour and child labour. As of December 31, 2023 March Networks had not started the process to identify such risks.

#### Risk Assessment

We recognize that the complexity of our supply chain can obscure the origin of raw materials and make it difficult to ensure responsible sourcing practices. The primary areas of our business and supply chains that carry a risk of forced or child labour include raw material sourcing & custom assembly purchases. As a leading manufacturer of video surveillance solutions, with operations in several countries, we recognize that we may be exposed to the risk of forced labour in the mining and manufacturing sectors through our indirect sourcing of semiconductors and custom assemblies specifically PCB's and metalwork. Semiconductor suppliers (even Tier 1) can often operate in regions with varying degrees of labor law enforcement and protections with documented case studies in China and Malaysia. PCBs assemblies require various minerals such as tin, tantalum, tungsten, and gold, commonly referred to as 3TG. These minerals are often sourced from conflict-affected and high-risk areas. The global supply chain for steel involves multiple stages, from mining and refining to manufacturing and distribution. This complexity can make it difficult to trace the origin of raw materials and ensure ethical practices. In line with our risk-based approach, we placed a particular emphasis on our suppliers in these industries, and they formed the core of our risk assessment and subsequent actions.

The risk of forced labour and child labour in supply chains is dynamic, complex, and often hidden. In order to surface this risk, in 2024 March Networks will prioritize efforts that give us visibility into our supply chain, so that we can identify susceptibilities and work with our business partners to address those risks. To safeguard the objectivity, accuracy, and strength of our efforts to prevent forced labour and child labour, we have partnered with Assent Inc, a third-party service provider, to assist us in reviewing our supply chain and identifying risks of forced labour and child labour. Working with Assent, we will conduct a risk evaluation to gauge suppliers' susceptibility to child labour and forced labour within their operations and supply chains.

#### **Remediation Measures**

We recognize that our policies and programs may not prevent all adverse impacts in our supply chain. In the future we will aim to provide effective remedies where it is determined that we have caused or contributed to those impacts. We will use our leverage to encourage our suppliers or partners to provide remedies where we find impacts directly linked to our business operations, goods, or services.

In the event of any forced or child labour findings, we will take immediate action to remediate the situation. This includes working with the supplier to address the issue, providing support for affected individuals, and, if necessary, terminating the relationship with the supplier.

#### Measures to Remediate Loss of Income

During the reporting year, we did not identify any actual cases of child labour in our direct supply chain and therefore we did not take any steps that led to loss of income to vulnerable families.

## Assessing effectiveness

We are working to understand the effectiveness and impact of the initiatives detailed in this report. Going forward, we will assess our effectiveness in ensuring that forced and child labour are not used in our business and supply chains through regular review and audits of our policies and procedures, feedback from our employees and suppliers, and supplier assessment programs.

# Approval and Attestation

This report has been reviewed and approved by March Networks Corporation's Board of Directors on behalf of March Networks Corporation and each of the reporting entities, and signed by March Networks Corporations Chief Executive Officer.

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.

Signed,

Peter Strom

Chief Executive Officer & Director March Networks Corporation

May 28, 2024

I have the authority to bind March Networks Corporation