

NWS

Modern Slavery Statement FY23

A letter from NWS Leadership

NWS is committed to the global effort to end modern slavery, child labor and human trafficking. As an equal opportunity employer, we are committed to creating a non-discriminatory and safe environment for our employees, vendors, and customers. Our recruitment and management systems are designed to ensure that all employees are legally able to work and are not subject to human rights abuses. Additionally, NWS does not knowingly enter business or support any supplier, customer or entity who is found to be involved in slavery, human trafficking, child labor or any forced or compulsory labor.

We continue to make strides in refining our organizational procedures to protect not only NWS but individuals within our community. In the following documentation, NWS outlines our efforts to protect our staff and those whom we secure business with. NWS looks forward to future opportunities to further support Modern Slavery legislation through our work to properly screen our supply chain and engage in vendor contracts that allow for protection of all labor contributors.

NWS will continue to review its internal practices to identify, and to the extent practicable, eliminate the risk of modern slavery, child labor and human trafficking from our business supply chain. This includes continuous improvement in cooperation with our employees, business partners and supply chain contributors.

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for NWS. 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 2024 reporting year.

I have the authority to bind NWS.



Xavier Williams
Chief Executive Officer
NWS



March 2024

This Modern Slavery Statement has been approved by the NWS Board of Directors.



About NWS

NWS empowers service providers, integrators, contractors, and organizations of all sizes to stay ahead of the curve. Established in 2012 and headquartered in Greensboro, North Carolina, USA; NWS boasts an extensive range of services across three key market segments.

Our cable solutions showcase cutting-edge copper, fiber, and hybrid designs. With a proficient team of engineers, manufacturing, and supply chain experts, we can tailor these custom trunked cable solutions to your precise specifications, ensuring your organization benefits from the most reliable and efficient telecom solutions on the market.

Our material and equipment distribution group presents a portfolio of world-class products from leading manufacturers. These offerings include hardware infrastructure solutions such as antennas, cable and connector solutions, hardware, passive components, and state-of-the-art test and measurement solutions. With this impressive array at your fingertips, you can rely on NWS for high-caliber solutions that keep you ahead of the competition. Additionally, we provide an all-inclusive suite of services, encompassing kitting and logistics for service providers. A network of warehouses across the United States and Canada guarantees prompt delivery of products and services, wherever and whenever you require them. Goods are securely warehoused, kitted by site, and shipped to your desired location.

A customer-centric approach has cemented NWS's reputation for reliability and responsiveness in the industry. NWS's success is also rooted in our pursuit of innovation and cutting-edge technology. Constantly exploring new horizons, we strive to bring the solutions our customers will need in the future. Our commitment to innovation enables us to lead the way in a rapidly evolving industry.



Our Commitment to Diversity

NWS is proud to be a certified Minority Business Enterprise and we recognize the contributions that diverse talent and suppliers bring to all facets of our business. As a company with business operations in the US and Canada, we are aware of the impact of these contributions to creating jobs and providing economic impact to the communities where we work and live. NWS is committed to providing equal opportunity in all our employment and purchasing practices.

We are committed to creating and maintaining a workplace in which all employees have an opportunity to participate and contribute to the success of the business and are valued for their skills, experience, and unique perspectives. This commitment is embodied in company policy and the way

we do business at our Company and is an important principle of sound business management.



NWS recognizes that working with **diverse businesses and suppliers** creates a business eco-system that helps drive innovation and growth. We are committed to providing direct and indirect business and procurement opportunities to small and diverse businesses (minority, Aboriginal, women, veteran, and service disabled-veteran, LGBTQI, and disability-owned).

NWS is pleased to be affiliated with several key diversity business organizations that help amplify our ability to make a meaningful business impact including:

- National Minority Supplier Development Council (NMSDC) Corporate Plus
- Carolinas/Virginia Minority Supplier Development Council (CVMSDC)
- Canadian Aboriginal and Minority Supplier Council (CAMSC)
- California Supplier Clearinghouse
- US Black Chambers, Inc (USBC)
- National Urban League



As a certified minority-owned business, NWS also assists our customers with achieving tier one and tier two supplier diversity spending goals through our products and services. As an NMSDC **Corporate Plus** member, we have the capability and experience of contracting with corporate members on a national basis.

Our Commitment to Sustainability

As a prominent telecom solutions company in North America our solutions are integral to vital communications infrastructure. NWS takes our responsibility seriously and we are committed to providing solutions that make our customers nimble while working to protect the natural ecosystems that supply us with raw materials.

Our team is comprised of exceptional intellectuals and innovators who are committed to making a difference, both within our organization and in the wider world. We are pleased that our exceptional solutions and services, management systems, sustainability and social governance initiatives have been recognized by customers and organizations. We recognize that our success depends on the health of the planet and the prosperity of the communities we serve, and we are committed to doing our part to prepare for the world we need next.

At NWS, we believe that sustainability is every company's responsibility and we're proud to be 100% powered by renewable energy. In addition to this investment, NWS's sustainability program is designed to measure, track, and reduce our annual carbon footprint through strategic initiatives. Annually, NWS eliminates 100% of our carbon emissions through RECs by investing in verified environmental projects around the globe that remove carbon dioxide from the atmosphere.



NWS is proud to publicly report our annual environmental impact through GHG Inventory reports, EcoVadis, and the Carbon Disclosure Project (CDP).

Corporate Governance and Social Responsibility

We believe supporting our local communities is a vital component of how we operate as a company. It is part of our value principles of sustaining and improving our community and commitment to corporate responsibility and ethics.

Our employees are actively involved in several important charitable organizations and our leaders and employees contribute annually to serve their communities.

NWS is committed to adherence of human rights and environmental related policies that are aligned with the **UN Guiding Principles**. We believe in the protection of human rights, the responsibility to respect these rights and the ability to remedy human rights abuses. It is our expectation that our employees, collaborators and supply chain resources adhere to the same ideology. NWS' ongoing commitment to corporate responsibility can be found in our Code of Ethics and Business Conduct and Diversity, Equity, and Inclusion policies.



NWS Operations and Supply Chain

Description of Operations

NWS has 155 employees spanning the US and Canada with its head office located in Greensboro, NC, Canadian headquarters in Mississauga, ON, and five additional distribution centers throughout North America.

Established in 2012, NWS boasts an extensive range of services across three key market segments including cable solutions, material and equipment distribution, and all-inclusive services including kitting and logistics for service providers.

Supply Chain Summary

During the 2023 reporting period, NWS had a total spend of \$83m over 217 suppliers, from 9+ countries. NWS' primary purchases were manufactured bulk hybrid cable, power cable and vaults in support of major telecom carriers.

Sustainable Development Goals

NWS supports the UN Global Compact Principles to respect human rights, end modern slavery, trafficking, and child labor and to ensure that our organization is not complicit in human rights abuses. Our current organization policies reduce the risk of contributing to global modern slavery in our operations and supply chain. Some of these related policies include:

- NWS UN Human Rights Statement
- NWS Code of Ethics and Business Conduct
- NWS Whistle Blower and Internal Investigations Policy
- NWS Diversity, Equity, and Inclusion Policy
- NWS Fraud and Corruption Policy
- NWS Conflict of Interest Policy
- NWS Employment Classification and Terms
- NWS Health and Safety Policy
- NWS Supplier Survey

During the FY2024, NWS is implementing the following to further our commitment:

- NWS Responsible Procurement Policy
- NWS Supplier Code of Conduct
- An updated NWS Supplier Survey with specific measurements as it relates to employment classifications and a commitment to the UN Guiding Principles.



Modern Day Slavery Risks in our Supply Chain

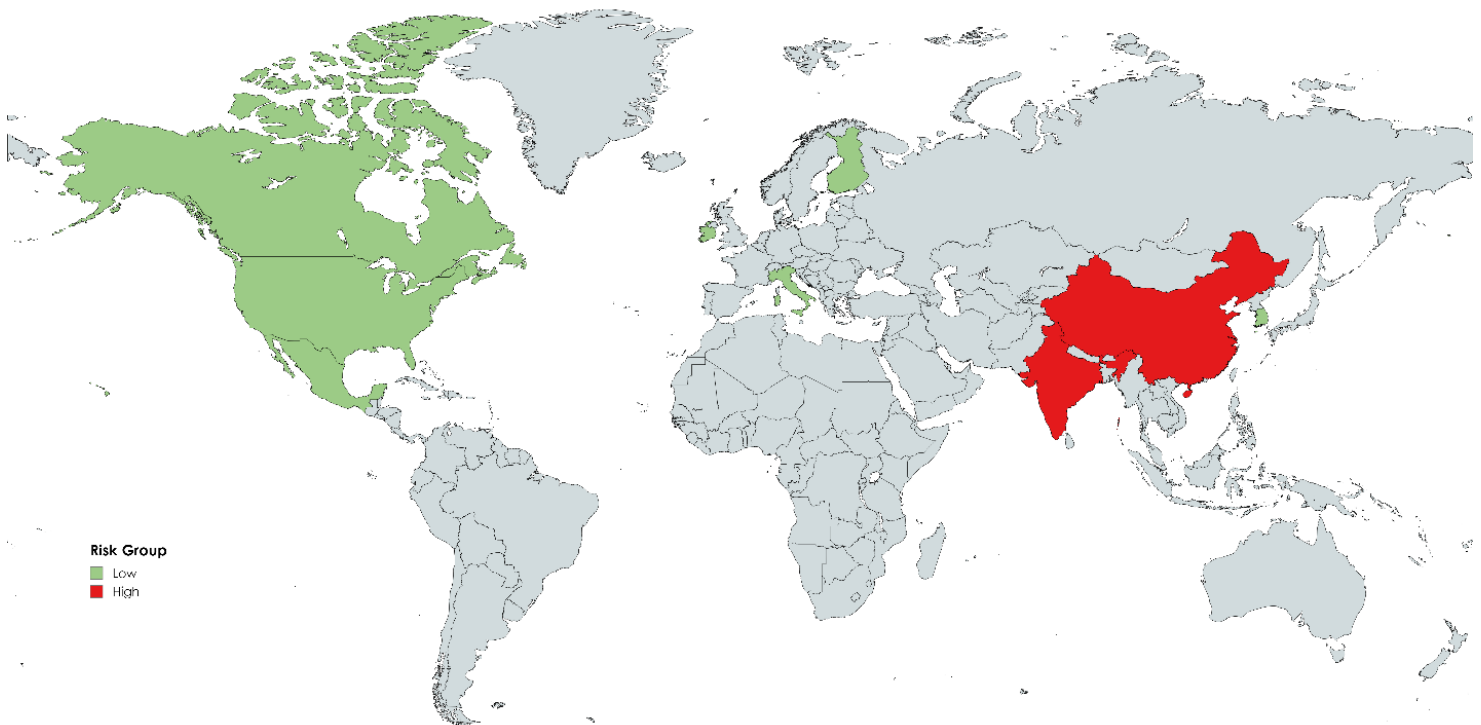
NWS recognizes there is an inherent risk in any operation that it may inadvertently contribute to modern slavery. To assess potential risk, NWS has identified internal risk areas and exposure to forced labour and child labour which are summarized below:

Description	Risk Exposure
Workers under the age of 18	Low
Casual or Contract Workers	Low
Migrant Workers	Low
Seasonal Workforce	Low
Sector Risk	Medium
Freedom of Association	Low
Engaged Services	Low
External Auditing	Medium

Due to location, sector and product/service type, NWS has identified the following modern slavery risks in our diverse supply chain:

Description	Risk Exposure
International Suppliers	Medium
Raw Material Sourcing	Medium

International Suppliers and Modern Slavery Risk by Region



Modern Day Slavery Risk Specific Actions

To date, NWS has not identified any specific instances of forced labor or child labor in its supply chain thereby has not taken specific measures to remediate forced or child labor or the loss of income that results from efforts to eliminate the use of forced or child labor in our activities or supply chain. Aside from some training specific to their roles regarding the policies identified above and relevant human resources policies, NWS does not engage in training for its employees that specifically addresses forced labor or child labor.

With regards to assessing effectiveness, NWS regularly audits its policies and procedures described above and annually surveys suppliers with relevant performance indicators. These measures assist NWS with its efforts to continuously improve its due diligence around issues of forced labor and child labor.

In 2024, NWS plans to take further actions to address potential risks and ensure our supply chain contributors are adhering to best practices.

Action	Estimated Time Frame
Formally Sign on to the United Nations Global Compact	2024
Continue EcoVadis Reporting Re: Operational Governance	2024
Design and implement Responsible Procurement Policy to guide purchasing decisions.	2024
Design and implement Supplier Code of Conduct to ensure compliance with UN Human Rights policies and supplier transparency.	2024
Further develop supplier onboarding process including modern slavery guidelines.	2024-2025
Supply chain transparency exercise including increased participation in supply chain surveys.	2024-2025