

**Fighting Modern Slavery**  
**Network Innovations' Statement and Report regarding Modern Slavery**

**For the calendar year ending December 31, 2023**

**About this Report**

Network Innovations Inc. and its affiliates are defined by the character and integrity of our operations. We are committed to conducting business with honesty and integrity wherever we operate around the world, treating all people with dignity and respect and complying with all applicable laws, regulations and treaties.

We are also committed to protecting and promoting human rights globally and are committed to a work environment that is free from human trafficking and slavery. We do not tolerate illegal child labor, forced labor or any use of force or other form of coercion, fraud, deception, abuse of power or other means to exploit people or to subject a person to involuntary servitude. We respect international principles of human rights - including, but not limited to, those in the UN Declaration of Human Rights, the US Trafficking Victims Protection Act of 2000 as amended, the US Federal Acquisition Regulation's (FAR) final rule on Combating Trafficking in Persons (52.222-50), the UK Modern Slavery Act of 2015, Fighting Against Forced Labour and Child Labour in Supply Chains Act of Canada 2023, the California Supply Chain Transparency Act of 2010, the French Corporate Duty of Vigilance Law (2017- 399), the Countering America's Adversaries Through Sanctions Act (Title III), the Australia Modern Slavery Act, Section 307 of the US Tariff Act and the Canada Customs Tariff Act (No. 9897.00.00) - and embody these principles and commitments in our corporate policies.

We comply with employment laws of every country in which we operate and expect those with whom we do business to do the same. Our Code of Business Conduct and Ethics and our policies including our Anti-Trafficking Policy are consistent with our core values to protect and advance human dignity and human rights in our global business practices.

We are pleased to present Network Innovations' 2023 Report regarding Modern Slavery which demonstrate the actions taken by us to prevent and reduce the risk of modern slavery and makes our commitments more public and ensure our stakeholders know the standards we apply to ourselves and expect from all of our business partners. Our employees, contractors, subcontractors, vendors, partners and others through whom we conduct business must avoid complicity in any practice that constitutes trafficking in persons or slavery. Our business partners are expected to act in accordance with the highest standards of integrity and in compliance with all applicable laws and regulations. We recognize that slavery and human trafficking can occur in many forms, including forced labor, forced child labor, domestic and indentured servitude, sex trafficking, bonded labor or debt bondage, and workplace abuse. Therefore, the terms "*slavery and human trafficking*" as used in this Report include these various forms of coerced labour.

This Report is being prepared in accordance with requirements set out in Part 2 of the Fighting Against Forced Labor and Child Labor in Supply Chains Act (also known as the "**Modern Slavery Act**" or the "**Act**"), effective as of January 1, 2024. However, this Report serves as a statement complying with the [Australian Modern Slavery Act of 2018](https://www.legislation.gov.au/Details/C2018A00153) (<https://www.legislation.gov.au/Details/C2018A00153>), the [UK Modern Slavery Act of](#)

2015 (<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>), the [California Transparency in Supply Chains Act](https://oag.ca.gov/SB657) (<https://oag.ca.gov/SB657>), and the [Modern Slavery Act](https://www.parl.ca/legisinfo/en/bill/44-1/s-211) (<https://www.parl.ca/legisinfo/en/bill/44-1/s-211>).

This Report is being filed on behalf of Network Innovations Inc. (“**Network Innovations**”), a corporation formed in Alberta, for itself and its wholly owned subsidiaries listed in this Report (hereinafter referred to as the “**Company**”, “**we**” or “**us**”). For the purpose of satisfying the requirements of the Modern Slavery Act, Network Innovations Inc. is the Reporting Entity.

*Attestation:*

*In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the Reporting Entity, Network Innovations Inc. 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 2023.*

*I have the authority to bind Network Innovations Inc..*

*Dated this 31<sup>st</sup> day of May 2024*



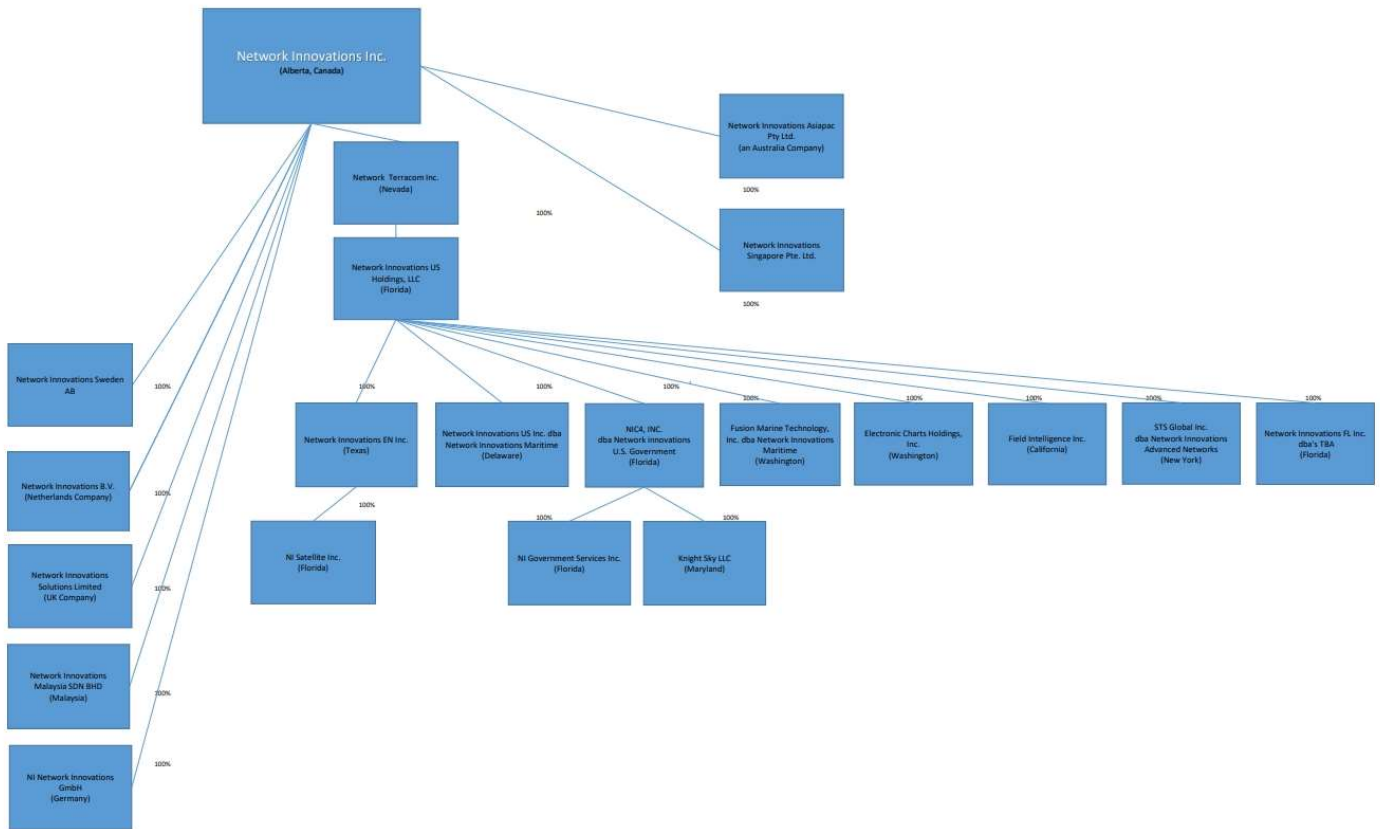
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*Derek Dawson*

*Co-CEO, Group President and Director*

## Structure, Activities and Supply Chain

Our Global Corporate Structure is as follows:



### *Activities:*

Network Innovations has a principal place of business at 4424 Manilla Road SE, Calgary, AB T2G 4B7, Canada and is registered in Alberta.

The Company has approximately 240 employees globally with 60 employees in Canada.

Collectively, the Company is a global systems integrator that keeps people, places and things connected with always-available communications solutions anywhere in the world. Our range of products and services include cellular services & private LTE, data connectivity, managed network services, IoT, automation & tracking, voice, radio & push-to-talk, video transfer & streaming, marine electronics, navigation & safety, business continuity systems, and custom hardware & software. Our customers operate in industries including government and defense, public safety, emergency response, oil and gas, media, mining, utilities, recreation, and maritime. Established in 1989 with a corporate office in Calgary, Canada, we operate via five lines of business: U.S & UK Government, Maritime, Americas & Asia, Europe, Middle East & Africa, and Advanced Networks providing solutions, services and products to customers across Canada and around the world.

### *Supply Chain:*

Each of these five lines of business (called 'Business Units') is comprised of local strategic sourcing, purchasing and logistics units that manage supply chain activities for the applicable Business Unit. Global suppliers are selected by the central corporate business unit for and on behalf of the group, and is primarily responsible for supplier selection, contract negotiations and supplier performance monitoring. Members of this team have global responsibilities and oversight and as such, report to the Co-CEO & Group President. The local purchasing groups are responsible for the day-to-day buying activities for their respective locations and report to their local management team. While these two groups do not share a common reporting structure, they work together as a cohesive team to ensure successful, streamlined operations.

We work with a large number of suppliers to procure the necessary products and services required to build our solutions. Our relationships with our suppliers are crucial to the long-term success. During the initial evaluation phase and on an ongoing basis, we consider suppliers' records and goals when evaluating supplier relationships.

Our supply chain is complex and global, and there are limits to visibility beyond the first tier of suppliers. However, we strive for more complete traceability and transparency throughout our global supply chain. To that end, when we established our Anti-Trafficking Policy, we also set-up a process whereby assessment of suppliers can take place.

We verify product supply chains through multiple methods, including site evaluations, questionnaires, discussions, and denied parties lists, among others. We require as a condition of contract that all suppliers agree to comply with all applicable laws and regulations.

### **Policies and Due Diligence Processes**

Network Innovations has established a variety of relevant policies to address modern slavery and human trafficking:

1. Our **Code of Business Conduct and Ethics** sets out the legal and ethical standards of conduct with which Network Innovations requires its personnel to comply. Amongst other things, it sets out our commitment to honest, ethical and fair working practices.
2. Our **Anti-Trafficking Policy** reflects our commitment to our values and our expectation that all of our suppliers will adhere and embrace such values. It includes a commitment that all employees must ensure in our selection of suppliers that all forms of modern slavery, including forced, compulsory labor and human trafficking, are prohibited and that they maintain safe and inclusive workplaces, based on recognized human rights. Network Innovations further requires that suppliers act with reasonable diligence to ensure that any of their contractors, subcontractors, manufacturing facilities, agents, partners, or subsidiaries, also comply with the principals, policies, and requirements expected of our suppliers.

We may terminate our relationship with any person or organization that does not comply with the above policies. Complete copies of these policies will be made available on our website at [www.networkinnovations.com](http://www.networkinnovations.com).

In order to prevent slavery and human trafficking in our business and supply chain we intend

to implement internal accountability standards and procedures.

Internal Leadership. Our Co-CEO and Group President will lead the development and implementation of the Company's efforts and promote responsible sourcing practices, including practices designed to prevent slavery and human trafficking. We intend to proactively communicate with external stakeholders and monitor trends and best practices in this area.

Risk Assessment. We intend to undertake a periodic risk assessment of our supply chain to better understand the potential risks related to human rights and labour issues.

Employee Reporting. Network Innovations will establish whistleblowing procedures to encourage employees to raise any concerns regarding compliance with this Report, or any other concerns, without fear of retaliation. If the violation involves suppliers, appropriate action, up to and including termination of contracts will be undertaken.

### **Modern Slavery Risks in Our Business**

The Company has considered the ways in which our activities and supply chains could potentially cause, contribute to or be directly or indirectly linked to actual or potential slavery and human trafficking. The Company intends to implement a risk-based approach to assess and review and manage the risk of slavery and human trafficking in our supply chain. To that end, we intend to implement periodic evaluations and audits of existing suppliers.

### **Remediation Measures**

The risk of Modern Slavery is lower in Canada, Australia and the United Kingdom than in many other countries. Based on our assessment of our activities and supply chains and as of the date of this Report, we believe that our activities and supply chain carry a low risk of modern slavery. If a situation of non-compliance is identified, we are committed to developing and implementing a corrective plan to improve and remediate the situation.

### **Training**

Network Innovations will develop training to ensure compliance with Company standards regarding this Report. We will develop and maintain training modules that support our commitment to human rights, including the prohibition of slavery and human trafficking, adherence to labour laws, and supply chain diligence, management and verification processes.

### **Assessing Effectiveness**

Network Innovations will develop, review, and reassess, our anti-slavery and human trafficking plans, not only to ensure compliance with the law but also to ensure that we fulfil our core values as expressed in this Report.

Collectively, this Report, the policies, processes, and procedures described herein, are all designed to ensure that Network Innovations and its suppliers at every level are committed to maintaining a workplace and supply chain free of slavery and human trafficking.

***Forward-Looking Information***

*Certain statements contained in this Report constitute forward-looking information. Although Network Innovations believes that the expectations reflected in the forward-looking information are reasonable based on the information available on the date such information is given made and processes used to prepare the information, such information is not a guarantee of future performance. Forward-looking information involves a variety of assumptions, known and unknown risks and uncertainties many of which are beyond the control of Network Innovations, and other factors, which may cause actual results, levels of activity, and achievements to differ materially from those anticipated by such forward-looking information. Due to the interdependencies and correlation of these risk factors, the impact of any one material assumption or risk on a forward-looking statement cannot be determined with certainty. The forward-looking information contained herein reflects Network Innovations' expectations as of the date of this Report and may be subject to change after such date.*