

2023 Forced Labour and Child Labour Report

This Forced Labour and Child Labour Report (the “**Report**”) addresses the period from January 1, 2023 to December 31, 2023 (the “**Reporting Period**”) and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada)(the “**Act**”). This Report is made on behalf of T-Base Communications L.P. doing business as Allyant (“**Allyant**” or the “**Company**”).

1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights.

As a multi-national provider of accessibility solutions and services to some of the most recognized entities in Government, Financial Services, eCommerce, Healthcare, Technology, and Education, Allyant recognizes the important role it has to ensure its activities, which are predominately in Ottawa, Ontario, Canada, Ogdensburg, New York, United States and Cairo, Egypt, and the supply chain that support Allyant’s provisioning of accessibility solutions and services, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in its supply chain. Allyant expects its business partners and suppliers (as well as their contractors, agents, subcontractors, sub-agents and labour agencies) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

Allyant is committed to maintaining high ethical and legal standards and strives to comply with both the letter and spirit of all applicable laws and regulations. Allyant seeks to maintain effective business controls and to maintain a robust compliance program to help detect and prevent violations of applicable laws, including laws regarding modern slavery, human trafficking and forced and child labour, throughout its activities and supply chain. Local policies and practices are reviewed and audited against corporate guidelines and legal requirements. Allyant’s compliance programs are evolving to meet changing business circumstances and regulations.

This Report sets out the steps we have taken during the reporting period to prevent and reduce the risk that forced labour or child labour is used at any step in the provision of accessibility solutions and services in Canada, United States or elsewhere by Allyant.

2. Business – Structure, Activities and Supply Chain

Allyant is a provider of accessibility solutions, offering comprehensive services for both digital and printed media, headquartered in Ottawa, Ontario, Canada. Allyant’s corporate structure includes the following group of entities, collectively doing business as Allyant:

T-Base Communications L.P.	T-Base Communications Holdings, Inc.	NetCentric Egypt (LLC)
T-Base Holdings Inc	T-Base Communications USA Inc.	NetCentric Australia Pty Ltd
T-Base Communications Inc.	NetCentric Technologies Inc.	A360 Enterprises, LLC.

Allyant empowers organizations to make their content accessible to individuals with disabilities, including those with low-vision and blindness. Allyant offers a comprehensive suite of enterprise software, automation, and tech-enabled services, supported by best-in-class customer support, to assist customers for assessing, achieving, monitoring, and managing compliance across digital documents, printed materials and digital experiences, such as websites, mobile apps, and software.

Allyant’s supply chain includes businesses that supply goods and services to our organization, primarily encompassing various vendors, suppliers, contractors, and subcontractors involved in the procurement of goods and services necessary for Allyant’s provisioning of accessibility solutions and services,

Policies

Through its organizational and governance policies, Allyant communicates its values and expectations, setting a high bar

for ourselves, our suppliers, and our business partners, and makes it clear that Allyant does not tolerate any form of forced labour or child labour. Allyant is committed to consistently evolving and improving our approach. Relevant policies are discussed in further detail below:

Rules of Conduct

Allyant is committed to conducting its business in a lawful and ethical manner. Allyant's Employee Handbook is the foundation of the Company's policies and sets out guiding principles on professional conduct of its employees and establishes that, in performing their job duties, Allyant employees are expected to always act to protect the interests and safety of all employees and the Company. All employees are expected to act in a professional manner with customers and the general public.

Whistleblower Policy

The Company is committed to high standards of ethical, moral and legal business conduct. In line with this commitment and a commitment to open communication, Allyant's Whistleblower Policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing. The Whistleblower Policy is intended to encourage and enable employees to raise serious concerns within Allyant rather than overlooking a problem or seeking a resolution for the problem outside Allyant. The Whistleblower Policy applies to all employees and those contractors working for Allyant. It is also intended to provide a method for other stakeholders (suppliers, customers, shareholders etc.) to voice their concerns regarding Allyant's business conduct.

Due Diligence

Allyant expects third parties with which it works to adhere to business principles and values similar to its own and to comply with all applicable laws and regulations. Before making any material and extended term commitments towards third parties, Allyant takes steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

3. Assessment and Management of Identified Risks

This Statement was produced in consultation with key management personnel at Allyant. This process involved engaging employees with supply chain management responsibility as well as Allyant's executive team.

Based on reasonable diligence, Allyant believes the risk of forced labour or child labour being used in goods and services required for ongoing business operations to be negligible. For example:

- Allyant procures goods and services from a limited number of suppliers and contractors, with the majority of supply chain expenditures due to printing supplies, postage and shipping costs, software licenses and hosting services required to perform our alternate format, document remediation, audit and hosting services;
- A very small number of these suppliers and contractors, with whom Allyant has been engaged on a long-term basis, make up a high majority of supply chain expenditures;
- The suppliers and contractors are primarily locally based, adhering to regulations in Canada and the United States for printing supplies, postage and shipping costs, software licenses and hosting services; and
- Allyant engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour in our business and supply chains, Allyant engages with our peers, consults with external experts, and conducts risk assessments during its procurement process.

4. Our Commitments

Allyant is committed to upholding the highest standards of ethical conduct, including the prevention of modern slavery and human trafficking in all aspects of our operations.

Evolving from the recognition of the existing human rights framework that supports equality for people with disabilities in Canada and the United States through the Accessible Canada Act and the Americans with Disabilities Act, Allyant is a multi-national provider of accessibility solutions and services to some of the most recognized entities in Government, Financial Services, eCommerce, Healthcare, Technology, and Education. We further recognize our responsibility to

ensure that forced labor or child labor is not used at any step of the provision of our solutions and services, whether within Canada, United States or abroad, by our entity or within our supply chains.

Measures Taken to Remediate Forced Labour or Child Labour and Loss of Income

Through the Reporting Period, Allyant did not identify any incidents of forced labor or child labor being used in its supply chain or the loss of income to vulnerable people as a result of the measures Allyant has taken, as described above. Therefore, Allyant did not need to take any remediation measures for the use of forced labor or child labor or for the loss of income to the most vulnerable people.

Training

Allyant personnel at all levels are required to adhere to our Rules of Conduct and Employee Handbook policies and ensure that it is understood and properly applied to their daily activities. Every new employee of Allyant must review and sign our Employee Handbook and is informed of how to report wrongdoing under our Whistleblower Policy.

Training covers many relevant topics, including legal requirements and rules of conduct. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge. During the Reporting Period Allyant did not provide training to its employees and contractors specific to forced labour or child labour. Allyant will be assessing what relevant training might be appropriate.

5. Our Progress and Assessing Effectiveness

As part of Allyant’s governance processes, the management team monitors compliance with Allyant’s policies on an ongoing basis and submits monthly compliance reports to Allyant’s Board. Allyant also reviews any concerns raised through its Whistleblower Policy and other informal mechanisms of employee feedback. Through the Reporting Period, no significant concerns or complaints have been identified.

Allyant has not found any modern slavery related incidents within our business activities or supply chain through the Reporting Period. Allyant will continue to consider the development of appropriate procedures and measures to assess the effectiveness of its efforts to identify and reduce any risk of forced labour and child labour in our activities and supply chains. Any non-conformances identified would be dealt with by the appropriate leadership and supply chain teams with remediation guidance and support provided to suppliers where necessary to resolve any issues raised.

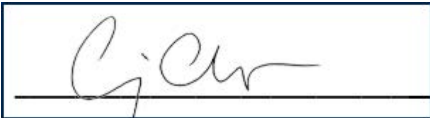
6. Approval & Signature

This Report was approved by the Board of Directors of T-Base Communications L.P., doing business as Allyant, on May 31, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on the Allyant website at www.allyant.com.

The Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of T-Base Communications L.P., the parent entity of the group of companies doing business as Allyant.

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.

I have the authority to bind Allyant.



Craig R. Albrecht
Director

May 31, 2024

I have the authority to bind Allyant.



John R. Clifton
Director

May 31, 2024