

REPORT UNDER THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT (CANADA)

FINANCIAL YEAR ENDED NOVEMBER 30, 2023

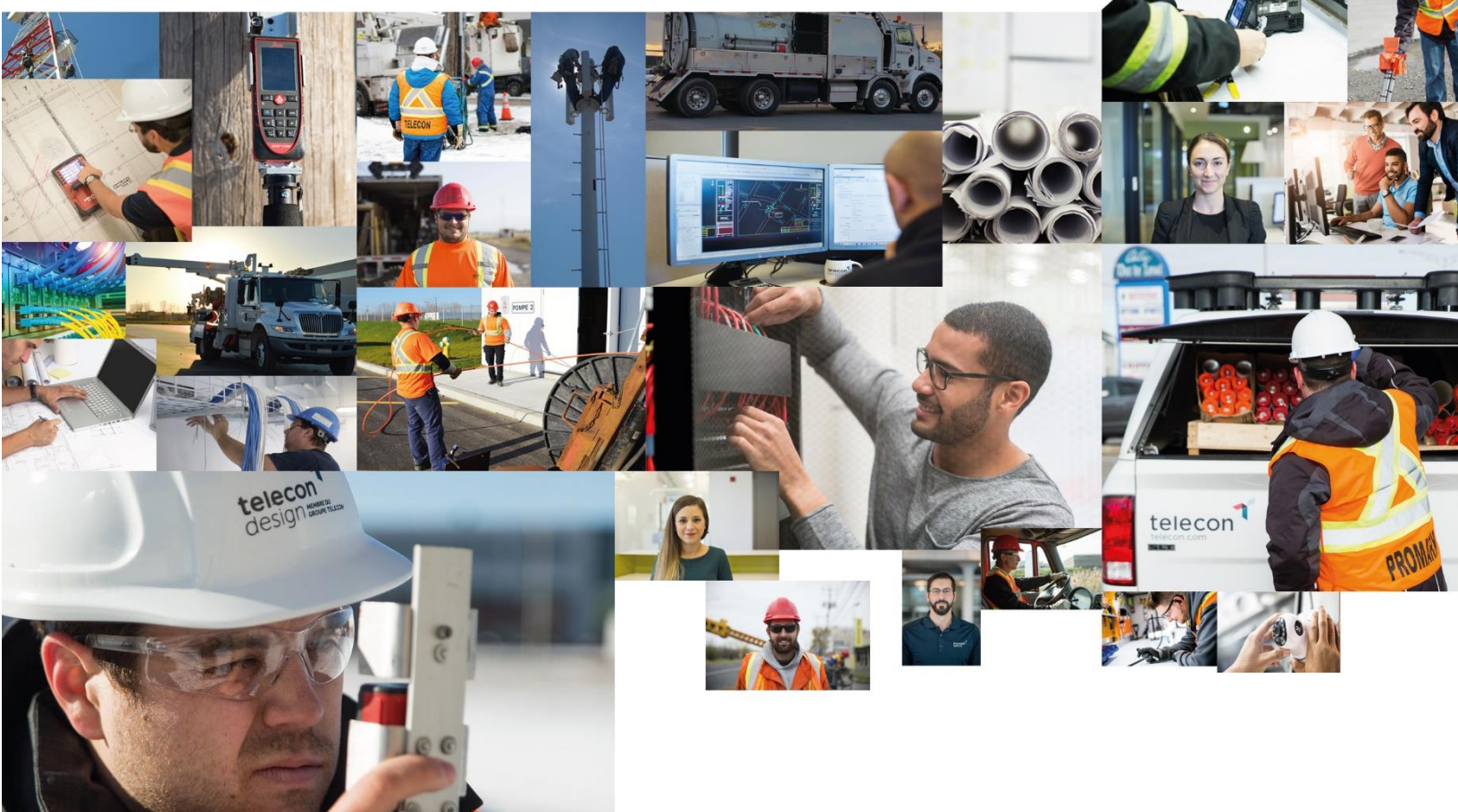




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1. Introduction

This report is prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”) and pertains to Telecon Inc. and its wholly owned Canadian subsidiary Expercom Telecommunications Inc. (collectively “**Telecon**”).

Telecon is unwaveringly dedicated to adopting and upholding the highest standards of integrity in all its business endeavors. Telecon’s senior management and leaders have made a steadfast commitment to exhibit exemplary conduct at all times, fostering transparent relationships with employees, customers, business partners, and suppliers alike.

At Telecon, the respect for human rights transcends mere commitment—it is the bedrock upon which we conduct our business. We recognize the safeguarding of human rights as not only a core corporate responsibility but also a guiding principle that shapes every facet of our operations. We also acknowledge the critical importance of actively fighting against forced labor and child labor in our activities. Our dedication to upholding these rights is absolute, and we hold ourselves and our partners to the same unwavering standard of accountability.

Telecon hereby provides its report to the Minister of Public Safety detailing the measures undertaken to mitigate and prevent the risks of forced labor and child labor within its supply chains.

2. Steps to prevent and reduce the risks of forced labour and child labour

Telecon took the following steps to prevent and reduce the risk of forced labour or child labour in its activities and supply chain:

a) Mapping activities

Telecon analyzed its activities and the activities of all its subsidiaries, reviewed its current policies and procedures and identified its main suppliers of goods.

b) Conducted a preliminary internal assessment of risks of forced labour and child labour in its activities and supply chains

Telecon purchases goods mainly to build telecommunication networks for its clients. A preliminary internal assessment shows that Telecon does business with approximately 2,000 suppliers, all of them located in Canada.

c) Identified documentations to be updated

In 2024, Telecon identified and updated its Code of ethics for employees, Code of ethics for partners and supplier’s onboarding questionnaire (the “**Questionnaire**”) to raise awareness amongst Telecon employees and partners (including its suppliers) on Telecon’s zero-tolerance policy with regards to the use of child labour or forced labour in its own work force and supply chain.

3. Telecon’s structure, activities and supply chain

From a regional telecom network builder founded in 1967 in Quebec (Canada), Telecon Inc. has grown into a world-class industry-leading telecom network design, infrastructure and connectivity services provider. Telecon Inc. delivers services across North America and operates 50 business locations in Canada and the United States. Telecon Inc. delivers diversified and scalable best-in-class services and turnkey solutions to North American telecom operators and businesses. Telecon Inc.’s highly skilled team is firmly committed to supporting its customers in propelling tomorrow’s connectivity in communities, businesses and homes.



Telecon Inc.'s vision is to Connect People, Connect the World. Its mission is to be the most innovative and valued communications infrastructure services partner to our customers, enabling them to play a key role in the transformation of infrastructure.

Depending on the regions and the activities, Telecon Inc. operates through this entity or different subsidiaries across North America. However, only the below entities and activities of the Telecon Inc. group are subject to the Act and this report:

Entity	Activity	Location
<p>Telecon Inc.</p> <p>Incorporated under the <i>Quebec Business Corporation Act.</i></p>	<p>Connectivity – Quality installation of network appliances and infrastructure solutions, support of installed infrastructure and flexible connectivity solutions for businesses.</p> <p>Infrastructure – Construction, installation, testing and maintenance of aerial and buried telecommunications network infrastructures supporting wired and wireless connectivity to end users.</p> <p>Turnkey services – Telecommunication network turnkey services.</p>	<p>Headquarters: Montreal, Quebec.</p> <p>Operates across Canada.</p>
<p>Expercom Telecommunications Inc.</p> <p>Incorporated under the <i>Canadian Business Corporation Act.</i></p>	<p>Infrastructure – Construction, installation, testing and maintenance of aerial and buried telecommunications network infrastructures supporting wired and wireless connectivity to end users.</p> <p>Turnkey services – Telecommunication network turnkey services.</p>	<p>Headquarters: Port Perry, Ontario.</p> <p>Operates across Ontario.</p>

Telecon Inc. and its subsidiaries share the same executive leadership team. As of November 30, 2023, Telecon's workforce counts 1034 employees in Canada.

Given the nature of Telecon's activities, Telecon's operation involve the sale of services more than goods. However, to provide some of those services, Telecon purchases different types of goods, some of which are integrated in the services Telecon provides and/or sold or distributed to Telecon's clients. For the financial year ending November 30, 2023, the following table presents the main goods that Telecon purchased for its activities from its first-tier suppliers and that are incorporated in the services it provides:

Good	Usage
Pipes	To enable the installation of telecommunication or electric cable
Cables	Data center wiring & telecommunication built
Poles and wires	Telecommunication network built
Optical fiber	IT room setup
Aggregate	Paving
Soil	Restoration



4. Policies and due diligence processes

Telecon's commitment against child labour and forced labour is reflected in its recruitment processes and policies for employees and in its pre-qualification processes and policies for suppliers.

For Telecon's employees

All Telecon employees are in Canada. Telecon's Talent & Culture team oversees hiring and onboarding employees. The Talent & Culture team has a uniform implementation of employment practices and procedures across all Telecon business units, which ensures collaborative partnerships with local unions and proactive efforts to ensure widespread awareness of high ethical standards and zero-tolerance policy. As an example, the following policies and processes are in place:

- **Law compliance:** Telecon complies with local labour law regarding minimum age of employment and the maximum number of working hours in all jurisdictions it operates. For unionized employees, Telecon complies with the maximum number of working hours permitted in the collective agreements.
- **Code of ethics for employees and related policies:** These documents are central to Telecon's values of respect and integrity. To reinforce Telecon commitment against child labour and forced labour, in 2024, Telecon added the following section in its Code of ethics for employees:

“3.5 Fighting against child labour and forced labour

Telecon does not tolerate any form of child labour, forced labour or exploitation of children in our activities and supply chain. Telecon will at all times comply with all applicable local labour and employment laws in the jurisdictions where we operate.”

The Code of ethics for employees and related policies are updated annually, communicated to and signed by all employees in order for employees to certify their commitment to these principles.

- **Recruitment and Onboarding Procedures:** For most new hires, the Talent Acquisition team does background checks through a third party and interview screening throughout the recruitment and onboarding processes.
- **Reporting violations:** Talent & Culture promotes Telecon's confidential Ethics hotline, a third-party organization, for safely and anonymously reporting any concerns or instances of child or forced labor without fear of retaliation. Telecon investigates all concerns reported promptly and takes appropriate action based on investigative findings. For unionized employees, union representatives provide an alternative for reporting concerns including child labour and forced labour without fear of reprisal. This approach also fosters accountability.

For Telecon suppliers

Telecon's procurement team oversees the pre-qualification and onboarding of new suppliers. Part of the procurement pre-qualification and onboarding processes include, but are not limited to:

- The collection and review of information regarding the supplier's company.
- All new suppliers receive a copy of Telecon's Purchase Order Terms and Conditions (the “**PO T&Cs**”), which states that the suppliers shall perform their obligations at all time in compliance with Telecon's Code of ethics and other policies, as updated from time to time. In 2024, Telecon



also ensured that the PO T&Cs are attached to all issued purchase orders via a link and added the following in its Code of ethics for partners:

“3.4 Fighting against child labour and forced labour

Telecon does not tolerate any form of child labour, forced labour or exploitation of children in our activities and supply chain. Supplier shall not use any form of child labour and forced labour in its facilities, activities and supply chain. Supplier must be able to demonstrate that no child labour and forced labour is used in its operations and that appropriate due diligence process is in place.”

Additionally, Telecon’s Code of ethics for partners states that in the event of a breach or non-compliance with that code by the supplier, Telecon may terminate the business relationship with the supplier.

- The completion of the Questionnaire. In 2024, Telecon also added the following question to its Questionnaire:
Does your organization have a policy or process that prohibits child labour or forced labour in its operations and in those of its suppliers? Please describe.

Therefore, in the event those processes identify any risk of child labour or forced labour, Telecon will not do business with the supplier. If Telecon later discovers that child labour or forced labour is used in a supplier’s operation, Telecon will cease doing business with that supplier.

5. Forced labor or child labour risks

For Telecon’s employees

Talent & Culture policies and processes outlined in the above section ensures compliance with applicable labour and employment laws in Canada and anywhere Telecon operates. We believe that the risk of child labour or forced labour amongst Telecon’s own person is negligible. Additionally, a mechanism is already in place for employees to report any case of child labour and forced labour they may encounter.

For Telecon’s suppliers

Telecon is primarily a telecom network design, infrastructure and connectivity services provider. To provide those services, Telecon purchases goods from suppliers, which are integrated in the services it provides. Telecon’s internal assessment of first tier suppliers shows that they are all Canadian suppliers, which must comply with labour and employment laws in Canada and, if they meet the Act’s criteria, will now also have to produce this report.

6. Remediation measures

In the last financial year, Telecon has not identified any incident of forced labour or child labour in its activities or supply chain. Telecon therefore did not need to take any measures to remediate an incident of forced labour or child labour.

7. Training

In the last financial year, Telecon did not have specific training on child labour or forced labour.

8. Assessing effectiveness

In the last financial year, no action was taken to assess the effectiveness in preventing and reducing risks of forced labour and child labour in Telecon’s supply chain.



9. Conclusion

In conclusion, Telecon remains steadfast in its commitment to upholding human rights and ethical standards within its operations and supply chains. Telecon implemented proactive measures aimed at preventing and mitigating the risks associated with forced labor and child labor. These efforts underscore Telecon's dedication to fostering transparent and responsible business practices. Telecon will continue to prioritize the well-being of all individuals involved in its operations, ensuring that its business remains a force for positive change in the global community.

10. Approval and 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 the report for the 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.

Full name: Robert Pothier
Title: President and CEO
Date: May 24, 2024

Signature: 

I have the authority to bind Telecon Inc. and Expercom Telecommunications Inc.