



CANADA HQ

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Forced Labour and Child Labour Report for Zayo Canada Inc.

This report is made in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") by Zayo Canada Inc. ("**Zayo Canada**" or "**we**").

This report has been prepared for the calendar year ended December 31, 2023.

Zayo Canada's board of directors, as the principal governing body, approved this report.

Who We Are: Activities, Structure, and Supply Chains

Zayo Canada provides connectivity solutions across Canada. We provide Internet Protocol (IP)-based communication services including voice, data, high-speed Internet access, and managed IP services to businesses and governments. Zayo Canada is an affiliate of Zayo, a communications infrastructure services company with international reach, and the only Pan US/Canada fibre network provider.

We have a global supply chain and international suppliers to achieve our business goals. Most of Zayo Canada's goods are sourced domestically, though we import certain network infrastructure equipment from outside Canada. Zayo Canada understands the risks of forced labour and child labour in global supply chains, particularly with materials sourced outside of North America, the EU, and the UK, and therefore comply with our parent level policies and procedures to mitigate this risk.

Zayo entities are committed to prohibiting and driving out acts of forced labour, child labour, and human trafficking within our business and supply chains, and expect the same of our subcontractors and partners. To achieve this commitment, we are constantly seeking ways to improve transparency within our organization and with our goods and services providers through the below policies and procedures.

How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labour

Zayo Canada is committed to acting responsibly and maintaining integrity within our operations. We maintain high standards of social responsibility and ethics within our operations and expect our partners and suppliers to adhere to a similar standard. This commitment is supported by our strong commitment to transparency and effective corporate governance.

All policies and procedures set at the Zayo parent level apply to Zayo Canada to ensure effective corporate governance and to manage the risk of forced labour or child labour being used in our supply chains.

1. Our Policies

Our commitment to continuously improving our Environmental, Social, and Governance ("**ESG**") approach is enshrined within Zayo's **Supplier Code of Conduct**. The Code stipulates that suppliers must protect human rights and comply with such employment principles as stated in International Labour Organization Conventions, including prohibitions against child labour, and forced, trafficked, or compulsory labour. Zayo suppliers are also prohibited from using conflict minerals linked to human rights violations.

Under the Supplier Code of Conduct, suppliers are expected to compete fairly and adhere to all applicable laws and regulations, and maintain their own policies and practices that support Code compliance. Suppliers must also comply with all safety related laws and report to Zayo any safety related incidents. This includes an expectation that suppliers will inform their employees, agents, and subcontractors of the Code's requirements.

Zayo's **Code of Conduct and Safety Requirements** obligates Zayo suppliers to comply with all applicable laws and regulations pertaining to labour and employment practices, human rights, and environmental matters, among others. The Supplier Code of Conduct explicitly prohibits child labour, forced labour, or involuntary labour used by suppliers or their third parties, and requires suppliers to have enforceable policies in place that ensure harassment, abuse, and discrimination does not occur within the workplace. We also expect suppliers to comply with applicable employment standards laws, including those relating to minimum wages.

Through Zayo's **Environmental, Social, and Governance Policy** we highlight our efforts in environmental impact, social responsibility, and corporate governance. Part of these efforts include developing the above-outlined policies and Zayo's annual ESG/Sustainability Report. Zayo's ESG Policy reiterates our commitment to prohibiting and driving out acts of modern day slavery, child labour, and human trafficking both within our operations and the operations of our suppliers and their subcontractors.

Finally, under Zayo's **Code of Business Ethics & Conduct**, all directors, officers, and employees of the company must comply with all applicable laws, rules, and regulations. The Code of Business Ethics & Conduct highlights four main principles: respect, honesty, integrity, and responsibility. We strictly prohibit all forms of harassment and discrimination and expect employees to follow uphold workplace safety by following safety rules and reporting unsafe conditions.

2. Our Due Diligence Processes

Zayo reserves the right to assess and monitor suppliers' compliance with our Code of Conduct and Safety Requirements. To do so, we may require suppliers to provide a report demonstrating their compliance. Where instances of non-compliance are found, suppliers are obligated to take all reasonable measures to conform with the Code, and where suppliers fail to do so, we may terminate agreements to supply goods and services to Zayo.

3. Employee Training on Forced Labour and Child Labour

Zayo currently provides training to employees on the Code of Conduct and anti-corruption principles. We do not currently offer training specific to forced labour and child labour, however these topics are discussed in the Code on which training is provided.

4. How We Monitor Ourselves and Our Suppliers and Assess Effectiveness

Zayo's directors and senior management are responsible for implementing policies pertaining to forced labour and child labour in Zayo supply chains. The ultimate responsibility to ensure slavery and human trafficking are not occurring within Zayo's operations lies with the Managing Director.

Under Zayo's Supplier Code of Conduct and our Code of Business Ethics & Conduct, employees, suppliers, and subcontractors are expected to report unethical conduct. We maintain an Ethics & Compliance Helpline through which Zayo employees and suppliers may raise anonymous questions and concerns relating to

unethical behaviour or policy violations. Proven violations will result in appropriate disciplinary action, up to termination. Zayo has a Whistleblower Protection Policy which underlines our zero-retaliation policy for individuals who voice concerns.

We also encourage employees to raise their concerns with a manager, Employee Relations Manager, Human Resources Business Partner, or the Legal team.

How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour in our Supply Chains

As of December 31, 2023, Zayo Canada has not encountered situations of forced labour or child labour in our supply chains. We therefore have not had to remediate such situations.

If such situations were to occur, Zayo has established formal procedures concerning slavery and human trafficking, including disciplinary procedures.

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 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.

Vanessa Hyjek
Managing Director, Zayo Canada Inc.

May 30, 2024

DocuSigned by:

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I have the authority to bind Zayo Canada Inc.



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Canada

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**RESOLUTIONS OF THE DIRECTORS
OF
ZAYO CANADA INC.
(the “Corporation”)**

MODERN SLAVERY STATEMENT APPROVAL

RECITALS:

Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires the Corporation to prepare and file a modern slavery report. Specifically, this report must describe the steps taken by the Corporation during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods by the Corporation or imported into Canada by the Corporation. The Act requires that the report be approved by the Corporation’s governing body.

RESOLVED THAT:

1. the directors of the Corporation approve the filing and publication of the Corporation’s mandatory modern slavery report, as appended.
2. the directors of the Corporation agree to provide the attestation in the form provided in the appended report.

The foregoing resolutions are approved by the directors of the Corporation and may be signed and delivered by the director(s) in any number of counterparts and/or by electronic transmission, each of which shall be deemed to be an original and shall together constitute one and the same instrument.

DATED: May 30, 2024

Vanessa Hyjek

NAME: Vanessa Hyjek