

eastlink

Annual Report
***Fighting Against Forced Labour and Child Labour in Supply
Chains Act***

1 Statement of Commitment

Bragg Communications Inc., carrying on business as “Eastlink” is filing a single entity report for the reporting period of September 1st, 2023 to August 31st, 2024, in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). Although this report primarily addresses activities within the reporting period, some occurred afterward.

2 Introduction and Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

Eastlink is a privately owned facilities-based telecommunications company that provides residential and business TV, Internet, telephone, mobile, and home security services across seven Canadian provinces.

Eastlink is committed to upholding human rights across all aspects of our operations, supply chain, business partnerships, and stakeholder interactions. We share the values of, and commit to, respecting and protecting human rights as reflected in Canadian human rights laws and international proclamations on human rights. To ensure the effective implementation of these principles, Eastlink strives to collaborate with organizations that share and demonstrate these principles in their own practices.

Eastlink has initiated several actions towards furthering our commitment to human rights including:

- Conducting an annual review of our Supplier Code of Conduct;
- Engaging suppliers to encourage their adherence to our Supplier Code of Conduct;
- Implementing screening questions into supplier onboarding procedures;
- Conducting a supply chain mapping and risk assessment exercise;
- Evaluating our Procurement Policy and updating its contents; and
- Providing employees training on human and labour rights in supply chain.

3 Activities and Suppliers

Eastlink procures a diverse range of goods and services, spanning from television programming and waste disposal services to corporate apparel, mobile devices, network equipment, and IT hardware. The items imported by Eastlink include a range of mobile devices, internet modems, and other electronics. While a significant portion of these products are procured from reputable suppliers based in Canada or the United States, who have their own human rights due diligence obligations, this category of products may carry an elevated risk of forced and child labor. This is primarily due to the fact that a majority of these items are manufactured and assembled in countries where the legal and

regulatory frameworks pertaining to human rights and labor standards may not align with the standards practiced in North America.

Eastlink does not own any factories or manufacturing facilities, nor do we handle raw materials. Eastlink primarily acquires hardware equipment and devices directly from manufacturers as well as distributors. Subsequently, these products are used in our network or resold to our retail and business customers as part of our service offerings.

4 Policies

Eastlink's Human Rights Statement outlines our dedication to promoting human rights throughout our operations, supply chain, and stakeholder interactions. This statement reflects our commitment to ethical practices in compliance with both Canadian human rights laws and international declarations, including the United Nations Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

To help ensure that our suppliers maintain the same standards we uphold within our organization, we maintain our Supplier Code of Conduct ("Supplier Code") which governs the conduct and practices we require from our suppliers. It encompasses ethical standards, labour practices, environmental considerations, human rights, and other criteria that suppliers must adhere to. The Supplier Code aligns with Eastlink's core values and aims to foster sustainable, ethical relationships with our suppliers and is reviewed on an annual basis.

5 Due Diligence Processes

To strengthen our supplier onboarding, Eastlink has implemented a process that requires employees to complete screening questions when submitting a request to onboard a new supplier. This updated procedure bolsters our ability to identify suppliers without official policies against forced and child labor. It also enables us to gather data for risk evaluation and supplier analysis. By integrating due diligence into the responsibilities of all purchasing decision-makers, we are raising collective awareness of supply chain risks and thereby improving our mitigation efforts.

Eastlink continues to proactively engage with suppliers to encourage their adherence to our Human Rights Statement and Supplier Code. Suppliers identified as having a higher risk exposure (see Section 6) have been issued a formal notice letter which informs them that acknowledgement of the Supplier Code will be mandatory.

If a supplier declines to acknowledge Eastlink's Supplier Code, they are extended the option to provide alternative documentation demonstrating their alignment with it. This allows suppliers to showcase their commitment to responsible business practices through their own established frameworks. To be considered eligible, the provided documentation

must, at the very least, reflect a dedication to the expectations and principles outlined in the Supplier Code.

In addition, Eastlink includes contractual clauses in new and renewing contracts or purchase orders, which encourages suppliers to provide assurance that they are following the provisions set out in the Supplier Code.

Eastlink remains dedicated to collaborating closely with our people, suppliers, and stakeholders to continually enhance and fortify our due diligence approach.

6 Forced Labour and Child Labour Risks

Eastlink has taken a risk-based approach to identifying areas of greatest risk across our supply chain by conducting an annual supply chain risk assessment. The risk assessment considers numerous factors such as the goods and/or services provided, country of origin, available policies related to human rights, and Eastlink's annual spend per supplier. The primary objective was to identify areas of potential human rights vulnerabilities within our supply chain to help narrow the focus of our direct engagement procedures.

Among the suppliers categorized as moderate to higher risk, we have identified that our greatest potential exposure lies with suppliers in the following categories of goods and services:

- IT hardware manufacturing
- Mobile devices and accessories
- Call center support
- Equipment distribution
- Technology products and solutions
- Construction or contracting services
- Apparel and other merchandise

7 Remediation Measures

While no remediation measures have been implemented during the reporting period, Eastlink maintains committed to administering appropriate remedy should any incidents of forced labour or child labour be detected in our operations or supply chain.

8 Remediation of loss of income

No remediation of loss of income have been undertaken by Eastlink during the reporting period.

9 Training

As part of our commitment to upholding human rights in our operations and supply chain, Eastlink has provided mandatory training on the Act to senior management and employees directly involved in purchasing. This comprehensive training covered areas of risk relevant to the telecommunications sector, as well as familiarized employees with our company's policies and due diligence procedures. This training has been made available to all employees through our internal learning platform and all senior management and employees directly involved in purchasing will be required to complete refresher training every 3 years.

10 Assessing Effectiveness

Eastlink is committed to continuously reviewing and improving our supply chain management procedures to ensure they adequately address the risks of forced and child labour beyond our direct suppliers.

11 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 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.

x 

Matthew Bragg

Director

I have the authority to bind Eastlink

May 27, 2025

