

2024 Fighting Against Forced Labour and Child Labour in Supply Chains Report



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About this Report

This 2024 Fighting Against Forced Labour and Child Labour in Supply Chains Report (the "Report") has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and relates to the reporting period of September 1, 2023, to August 31, 2024 ("fiscal 2024"). This Report is submitted on behalf of Cogeco Inc. and Cogeco Communications Inc. (collectively "Cogeco"), which are both reporting issuers, and their respective subsidiaries. Some of the statements herein, including information about various initiatives and programs, may not apply equally to all entities. Where possible, we have indicated when initiatives apply only to a specific entity.

Other related corporate documents

[2024 Annual Report for Cogeco Inc.](#)

[2024 Sustainability Report](#)

[2024 Sustainability Data Supplement](#)

[Code of Ethics](#)

[Supplement to the Code of Ethics](#)

[Sustainability Policy](#)

[Supplier Code of Conduct](#)

[Anti-Corruption and Bribery Policy](#)

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Our business and supply chain

Cogeco Inc. is a diversified holding corporation operating in the telecommunications and media sectors through its subsidiaries Cogeco Communications Inc. and Cogeco Media. We take pride in our strong presence in the communities we serve and in our commitment to a sustainable future.

Our business

Cogeco Communications Inc. provides world-class Internet, video and wireline phone services to 1.6 million residential and business subscribers in Canada and thirteen states in the United States. We also offer wireless services in most of our U.S. operating territory. Cogeco Media operates 21 radio stations in Canada, primarily in the province of Québec, as well as a news agency. Our workforce is composed of 4,900 employees across Canada and the U.S. For further details about our workforce, including the distribution of employees in Canada and the U.S, refer to our [2024 Sustainability Data Supplement](#).

Cogeco's headquarters are located in Montréal, Québec. Both Cogeco Inc.'s and Cogeco Communications Inc.'s subordinate voting shares are listed on the Toronto Stock Exchange (TSX: CGO and CCA). For more information on our business structure and activities, refer to our [2024 Annual Report](#).

Our supply chain

As a service provider, Cogeco does not produce any goods in or outside of Canada. However, we procure goods from suppliers that manufacture products that we distribute to customers or that we use to support our network. In fiscal 2024, Cogeco and its subsidiaries had 3,000 addressable suppliers, of which 170 accounted for 80% of our spend. The processes outlined in this report relate to all addressable suppliers, meaning suppliers under the management of the procurement department. Our suppliers do not change on a seasonal basis.

Suppliers that represent most of our direct spend provide the following category of goods and services: network construction and equipment; information technology software and hardware; customer premise equipment (including modems, set-top boxes, remotes and other accessories); and sales and marketing services. While a large majority of our suppliers are located in Canada and the U.S., the country of origin of the equipment and hardware we purchase may be from outside these two countries. Notably, some of the equipment and hardware we procure are manufactured in North African and Southeast Asian countries. Many of our suppliers are members of the Responsible Business Alliance, a coalition of companies working to improve the social, environmental and ethical responsibility of their supply chains.

Policies and due diligence processes

Cogeco is committed to implementing high ethical standards in its professional relationships and business practices. Outlined in the following sections are the policies and processes Cogeco has put in place to prevent and reduce risks of forced labour and child labour in its supply chain. This includes the adoption of our Supplier Code of Conduct and our Code of Ethics as well as our supplier due diligence process and risk assessment.

Policies

SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct requires suppliers to, among other things, abide by applicable employment standards, labour, non-discrimination, and human rights legislation. The Supplier Code of Conduct draws upon internationally recognized standards and encourages suppliers to go beyond legal compliance. It explicitly prohibits the use of forced labour and child labour, and is regularly reviewed and updated to ensure its continued relevance and address emerging supply chain challenges. We engage with our top suppliers, requiring their acknowledgment and adherence to our Supplier Code of Conduct. Where we are satisfied that a supplier's policies and procedures are at least equivalent to the Supplier Code of Conduct, we may accept a supplier's commitment to comply with their own policies and procedures. Failure to comply with the Supplier Code of Conduct may result in the termination of the business relationship.

Principles of Cogeco's Supplier Code of Conduct

- Respect for labour and human rights
- Valuing occupational health and safety
- Respect for the environment
- Ethical and responsible conduct



Our Supplier Code of Conduct is in line with international standards

- United Nations Guiding Principles on Business and Human Rights
- International Labour Organization
- Declaration on Fundamental Principles and Rights at Work
- United Nations Universal Declaration of Human Rights
- Responsible Business Alliance (RBA) Code of Conduct

CODE OF ETHICS

The Code of Ethics affirms our commitment to ethical conduct and our practice of complying with all applicable laws. The Code applies to all directors, officers, employees and agents of Cogeco, including all consultants and subcontractors who maintain a relationship with Cogeco. All directors, officers and employees of Cogeco must acknowledge every year that they have read, understood and agree to comply with the Code.



UNITED NATIONS GLOBAL COMPACT

Cogeco is a signatory to the United Nations Global Compact, which reaffirms our commitment to respecting and promoting universal human rights, implementing decent work practices, reducing our environmental impact, and implementing anti-corruption mechanisms. In fiscal 2024, we completed the United Nations Global Compact Canada Business & Human Rights Accelerator Program, which aims to help advance human rights due diligence processes.



United Nations
Global Compact

Due diligence processes

Cogeco has policies and mechanisms in place to ensure that suppliers demonstrate a strong commitment to ethical behaviour and legal compliance, which are continually reviewed and updated.

Our Request for Proposal (RFP) protocol includes a sustainability questionnaire to evaluate supplier commitments to human rights including modern slavery prevention, which is factored into supplier selection.

We conduct due diligence assessments to identify and assess potential risks, including those related to financial stability, conflict of interest, corruption, sanctions and reputation (including sustainability-related risks). The assessment of risk is based on numerous factors, including the criticality and total contract value of the supplier, as well as the country and industry in which the supplier operates (with greater scrutiny for countries deemed "high-risk" by Transparency International's Corruption Perceptions Index and the Global Slavery Index).

Forced labour and child labour risks

Given the complex nature of our supply chain beyond our direct suppliers, various associated social, environmental and ethical risks need to be addressed and monitored.

Identifying risks in our supply chain

In 2024, we continued our assessment of forced labour and child labour risks within the technology and communications industry to identify those specific to our supply chain. Our assessment identified electronic equipment manufacturing and disposal as the areas of our industry most vulnerable to forced labour and child labour. Other high risk factors include regions with low skilled workers, countries identified as being high risk by the Global Slavery Risk and certain types of products and services classified as high risk by the United Nations Global Compact. Following this assessment, we identified that forced labour and child labour risks are highest in our extended supply chain, notably, in the direct and indirect suppliers of our customer premise equipment and network construction.

Third-party risk management (TPRM)

Cogeco's Procurement group incorporates a Third-Party Risk Management (TPRM) program that manages continuous risk monitoring for critical suppliers in the procurement process. The TPRM program periodically evaluates our current critical direct suppliers on various risk categories. In fiscal 2024, we implemented a third-party tool to map and monitor different risk dimensions in our supply chain including sustainability, sanctions and restrictions. This tool enables us to monitor a broader range of suppliers and focus on higher-risk categories for potential forced labour or child labour issues or allegations.

Reporting and remediation

ETHICS LINE

A third-party managed Ethics Line is available 24/7 in English and French, enabling employees, suppliers, partners, and other interested parties to anonymously report concerns related to ethical business practices, Code of Ethics and policy violations, and illegal or unsafe behavior, via telephone or online submission.

All reports submitted through the Ethics Line are seriously and thoroughly investigated under the guidance of the Vice President, Internal Audit. Individuals are protected from retaliation of any kind for reporting in good faith. **To date, no report has been received regarding a situation of non-adherence to the Supplier Code of Conduct involving one of Cogeco's suppliers on the topics of forced labour or child labour.** Additionally, in our assessment of our supply chain, we have not identified any forced labour or child labour in our activities and supply chains. Therefore, no measures of remediation of loss of income or other measures were taken to mitigate forced labour or child labour in our supply chains.

Your voice matters



Ask a question or report a violation

BY TELEPHONE

Canada or United States • 1 877 706-2640

ONLINE

www.clearviewconnects.com

Send us your FEEDBACK or anything related to ethics at Cogeco, at: ethics@kogeco.com

Training

Cogeco provides part of its workforce with training on the prevention of forced labour and child labour, including specific training on this topic and the Code of Ethics, to equip them with the necessary knowledge and skills.

Training on the Code of Ethics

Mandatory ethics training is provided for employees during their onboarding and every two years thereafter. This training is delivered through a web-based management learning system that monitors and tracks training completion by all employees.

Training on forced labour and child labour

In 2024, Cogeco's procurement team received mandatory forced labour and child labour training sessions outlining new regulatory requirements, an overview of risks in the telecommunications industry, a review of Cogeco's due diligence processes and tools, and procurement's role in identifying and flagging signs of forced labour and child labour in supply chains. This training has been added to the annual procurement training program.

Assessing effectiveness

Cogeco evaluates the effectiveness of its efforts to eliminate forced labour and child labour by periodically reviewing and updating its human and labour rights policies and procedures, and by tracking relevant performance indicators throughout its business and supply chains.

Cogeco has implemented strong governance practices around sustainability. The Board of Directors and three of its Committees, namely the Audit Committee, the Corporate Governance Committee and the Human Resources Committee, oversee the sustainability strategy including the identification, assessment, and management of key sustainability risks and opportunities, including with respect to human and labour rights. The Board of Directors and its committees receive regular updates from management regarding the management of these risks.

Approval and attestation

This Report provides an overview of the governance mechanisms and operational processes we have developed and implemented to identify and mitigate forced labour and child labour risks at Cogeco and within our supply chain. This report is intended to focus specifically on the topics of forced labour and child labour in order to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

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 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 make the above attestation in my capacity as a Director of the Boards of directors of Cogeco Inc. and Cogeco Communications Inc. for and on behalf of the Boards of Cogeco Inc. and Cogeco Communications Inc.



FRÉDÉRIC PERRON

President and Chief Executive Officer and Director of Cogeco Inc. and Cogeco Communications Inc.

April 9, 2025

I have the authority to bind Cogeco Inc. and Cogeco Communications Inc.



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