



2024 Forced and Child Labour Report

This report (the “Report”) is prepared on behalf of DATA Communications Management Corp. (“DCM”, or the “Company” or “our” or “we”), and is published in compliance with the Canadian “*Fighting Against Forced Labour and Child Labour in Supply Chains Act*” (the “Act”), for the financial year ending December 31, 2024 (“Fiscal 2024”).

Introduction

DCM has a zero-tolerance policy for any form of forced and child labour in our operations and supply chains. We respect and comply with all applicable laws in the countries in which we operate as they relate to these issues, and as they relate to freedom of association and the right to collective bargaining.

We believe it’s possible to be profitable and have a positive impact on the planet. We believe corporate responsibility isn’t just the right thing to do, it also makes good business sense. Together, we are working to transform the way we do business to ensure strong sustainability practices are ingrained into how we operate. Our platform focuses on three key areas: *reducing the impact our facilities have on our planet and ensuring they are safe places in which to work; improving quality of life for our people and society at large; and holding ourselves to rigorous and transparent standards.*

Our 2024 Sustainability Report mentions that we believe companies that hold themselves to strong sustainability guidelines that cover all aspects of their efforts are companies that win business and prosper. Additional information regarding our corporate social responsibility priorities, initiatives and progress made can be found in the Corporate Responsibility section of our website located at www.datacm.com.

Our Business

DCM is a leading Canadian tech-enabled provider of print and digital solutions that help simplify complex marketing communications and operations workflow. DCM serves over 2,500 clients including 70 of the 100 largest Canadian corporations and leading government agencies. Our core strength lies in delivering individualized services to our clients that simplify their communications, including customized printing, highly personalized marketing communications, campaign management, digital signage, and digital asset management. From omnichannel marketing campaigns to large-scale print and digital workflows, our goal is to make complex tasks surprisingly simple, allowing our clients to focus on what they do best.

We operate 20 facilities across Canada and in the State of Illinois, and we employ approximately 1,525 people. We serve our clients through the following primary solutions:

- Print and communications products and services, and related offerings
- Technology-enabled subscription services and fees
- Technology-enabled hardware solutions
- Marketing and other services

Additional information relating to DATA Communications Management Corp. is available on www.datacm.com, and in the disclosure documents filed by DATA Communications Management Corp on SEDAR+.

Policies

We have established the following policies which guide and support our commitment to sustainability, corporate responsibility and human rights.

1. Employee Handbook

Our Employee Handbook sets out guidelines for employees to promote a respectful, ethical, diverse, and dynamic workplace. It sets out general policies and procedures, security policies, health and safety policies, details DCM's commitment to the environment, business conduct, and ethics and privacy. DCM has zero tolerance for harassment and workplace violence of any kind.

2. Workplace Anti-violence, Harassment & Sexual Harassment Policy

Our Workplace Anti-violence, Harassment & Sexual Harassment Policy details DCM's commitment to providing a workplace that is free from intimidation, harassment, sexual harassment, and violence to both staff members and clients. The policy outlines the types of behaviors that constitute violations of the policy and it applies to all DCM employees, customers, consultants and suppliers. The policy also outlines the responsibilities of management and employees in ensuring adherence to the policy, including guidelines on filing a complaint.

3. Supplier Code of Conduct

The DCM supplier code of conduct sets out the core principles and standards that we expect our suppliers to adhere to while conducting business with DCM. This aligns with international human rights norms and Canada's Bill S-211. Our supplier code of conduct explicitly prohibits the use of forced and/or child labour at any stage of supply chain. It also requires suppliers to pay workers fairly, according to the relevant laws, and to have clear and transparent disciplinary policies. Our supplier code of conduct is incorporated into supplier agreements to ensure that the code has a legal binding force on applicable suppliers with whom an agreement is executed.

We expect all our suppliers to comply with the laws and regulations of the countries where they operate, and to conduct their business in an ethical, socially and environmentally responsible manner, consistent with DCM's expectations.

4. Sustainable Procurement Policy

DCM recognizes the critical role businesses play in addressing environmental and social challenges. As part of our commitment to corporate responsibility, our sustainable procurement policy has been established to guide the procurement practices of products and services across DCM locations. Our aim is to contribute to the preservation of the environment, support ethical and socially responsible practices, and positively impact the communities in which we operate. This Policy applies to all employees and suppliers involved in the procurement process, outlining the guiding principles in our contracts and procurement practices.

As part of the procurement process at DCM, employees are expected to ensure that suppliers respect and uphold human rights throughout our supply chain. This includes avoiding suppliers in exploitative practices and human rights violation, such as child labour and unsafe working conditions.

5. Health and Safety Policy

All employees are required to adhere to DCM's policies and safety procedures contained in our health and safety policy. DCM supervisory staff are required to instruct, and train our employees in safe work practices, ensuring that all employees work safely and are aware of relevant legislation and company safety policies. Employees, supervisory staff, management, health and safety committee members have a role to play in promoting a safe workplace.

6. Whistleblower Policy

DCM is committed to integrity and ethical behavior in the workplace and will foster and maintain an environment where employees can work safely and appropriately, without fear of retaliation. Our whistleblower policy describes the process for reporting complaints of wrongdoings in the workplace. This reporting mechanism is accessible to all employees and provides protection in two important areas: confidentiality and against retaliation.

We conduct a regular communications campaign informing employees of the anonymous and independent reporting supported by the whistleblower policy. So far, DCM has not received a report on human rights violations, including forced and child labour.

We are committed to reviewing our policies and procedures regularly, and to updating them as needed to ensure our continued support of applicable laws and regulations, including the Act.

Due Diligence Processes

DCM uses various methods and tools to monitor and assess its suppliers to mitigate against third-party risks, including forced and child labour, in our supply chain. This includes the supply chain risk management solutions from Sphera, where we constantly screen over 1000 suppliers for supply chain and environmental, social and corporate governance risks.. In 2024, as part of our

efforts to build a robust supply chain risk assessment process, we updated our procurement documents, policies, and procedures with the requirements of the Act.

In addition to the policies and due diligence processes mentioned above, DCM's senior executive team conducts regular visits to our facilities and supplier sites while remaining alert to any indications of forced or child labour.

Forced Labour and Child Labour Risks in our Operations and Supply Chain

Suppliers are required to adopt or establish risk assessment and management systems before engaging in work with DCM. The risk assessment and management process intends to provide transparency into the environmental, health and safety, social and labour practices, as well as ethical risks associated with supplier's operations and supply chain.

Our supplier qualification questionnaire includes a dedicated section on risk assessment and management. The sustainability section of the questionnaire investigates issues on a supplier's environmental management system, environmental performance (e.g. resource extraction and use), and occupational health and safety management. It also includes sections to ensure that suppliers have a process in place to ensure compliance with internationally recognized human rights standards, legislation and conventions.

DCM's suppliers of goods that are based outside Canada or the United States represent an insignificant proportion of our total value purchased. Based on data having been published by several sources on forced labour and child labour (such as the United Nations, the International Labour Organization and the United States Department of State, among others), the regions where DCM operates are generally not associated with high incidences of forced labour or child labour.

Finally, in 2024, we conducted an independent third-party risk assessment to map our supply chain and to screen for supplier risks. This risk assessment exercise was based on 2023 import volumes across DCM entities. The results of this risk assessment confirmed the Company's view that there is currently a low risk of forced and child labour in our supply chain.

Remediation Measures

In Fiscal 2024, we did not identify any incidents of forced labour or child labour in our direct business activities or our supply chain, and as a result, no remediation measures were taken by the Company, including those related to remediating the economic impact of remediation efforts on the most vulnerable families.

Regardless, should we be made aware of any issues regarding the behavior of members of our supply chain, it is our commitment that we would quickly address the situation by entering into discussions with the relevant party, investigating the facts and circumstances and entertain

required corrective actions with the supplier and ensure such corrective actions are fully implemented.

Training

In 2024, as part of our efforts to build a robust supply chain risk assessment process in compliance with the Act, DCM arranged for company-wide training concerning awareness of forced and child labour in the supply chain which was completed by approximately 1,350 employees.

DCM values the learning and development of our employees. We offer a variety of training courses through our internal training platform, which provides up-to-date and relevant training on various topics. We track and monitor the completion of training courses electronically. In addition to the training provided for our employees, we provide Buyer's training in sustainability and environmental, social, and governance ("ESG") which covers topics such as ESG frameworks, Scope 3 emissions, and the basics of greenhouse gas emissions.

Assessing Effectiveness

The Company has measures in place to prevent and reduce the risk that forced labour or child labour is used in our business operations and supply chains, as discussed in this Report. In preparing this report, DCM engaged with each of the reporting entities covered by this report, including our corporate procurement team, people and culture team and internal counsel.

We remain committed to preventing forced labour and child labour from taking place in our business and in our supply chain. We will continue to assess the effectiveness of our policies and processes to address the risks of forced and child labour across our business and supply chains.

Approval and Attestation

This Report was approved by the Board of Directors of DCM pursuant to subparagraph 11(4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I hereby 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.



Richard Kellam
DATA Communications Management Corp.
Director, and President and Chief Executive Officer
May 12, 2025