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Forced Labour in Canadian Supply Chains

Updated April 16, 2026

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Introduction

This report is Westman Media Cooperative Ltd.'s statement under Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act") for the financial year ending August 2025. The reporting entity covered by this statement is Westman Media Cooperative Ltd., business number 105647572.

For the purposes of the Act, Westman Media Cooperative Ltd. ("Westman" or "the entity") has a place of business in Canada, does business in Canada, and has assets in Canada. Westman also qualifies as a reporting entity under the Act for the reporting year listed above.

Westman Media Cooperative Ltd. is a member-owned cooperative operating broadband systems across Manitoba. Westman is an industry leader in communications, offering Internet, Digital HD TV, and Phone services to residents and businesses in the region.

Since our initial launch in 1977, Westman has been proud of its strong commitment to its members and the communities it serves. With a focus on youth, diversity, education, and technology, Westman's partnerships, sponsorships and donations provide the financial aid and human resources needed to help create sustainable communities across Manitoba. Our employees call Westman home and have made serving their community a priority.

Forced and child labour contradict our statement of purpose, vision and values. Therefore, Westman does not endorse any human trafficking and modern slavery within its organization or any organization with whom it conducts business.

1. Structure, Activities and Supply Chain

Westman envisions being a member-focused leader providing access to communications technology and innovative services for our cooperative members and the communities we serve.

Westman procures goods primarily from suppliers within North America to build our network and provide our members with Internet, voice, and video services. It is noted that some of our suppliers may source their goods from countries outside of North America, such as customer premise equipment installed in members' homes that is returned to Westman upon termination of services.

2. Policies and Processes in Relation to Forced and Child Labour

Westman maintains purchasing policies and a code of ethics across our organization. Honesty, transparency, and trust are the fundamental pillars of our supply chain principles and code of ethics. All procurement or supply chain operations employees are expected to act ethically, professionally and with integrity. As a provincially incorporated cooperative in Manitoba, Westman follows federal employment standards for its supply chain operations.

The following are the established policies and procedures within Westman's supply chain policy framework:

- Human Resource Policy Manual: The purpose of the HR Policy manual is to provide team members with a comprehensive and centralized resource of policies, procedures, guidelines, and best practices related to Human Resources. This encourages consistency and transparency, as team members may refer to this manual whenever questions arise.
- Purchase Order Policy: The purpose of this policy is to ensure Westman receives the best value for the goods and services it requires for operations and that these goods and services are purchased through fair, transparent, consistent, and cost-effective procurement procedures.
- Request for Material Procurement Framework: A framework with multiple governance checks to raise a material procurement request in the supply chain.
- New Vendor setup procedure: The purpose of the SOP is to incorporate modern slavery compliance as part of the vendor and supplier evaluation process. Compliance is

reviewed by Westman, and a supplier's failure to comply may result in disciplinary actions up to and including termination of contracts.

Westman also aims for constant improvement, and its labour practices undergo a semi-annual Enterprise Risk Management (ERM) assessment to ensure adherence to regulatory standards. The ERM, once assessed, is reported to the Board of Directors, and we assess the entire supply chain as a risk in ERM.

Westman endeavours to continuously enhance supply chain policies and procedures and implement a due diligence process by incorporating a Supplier Code of Conduct with its supply chain partners to reduce the risk of forced labour and child labour in its supply chains.

3. Identification of Forced and Child Labour Risk

To understand where in the supply chain forced or child labour risks may exist, Westman carried out a risk assessment process. Our risk identification exercise did not assume the presence of forced or child labour within our operations or supply chains. Instead, it aimed to identify potential scenarios where such risks could emerge, allowing us to implement effective preventative measures. Our assessment acknowledged that no industry is entirely exempt from the risks of forced and child labour and that there are inherent vulnerabilities within certain sectors of our supply chain, particularly in regions where regulatory frameworks and enforcement mechanisms might not be robust.

Our analysis considered specific geographic regions that, according to the Walk Free Global Slavery Index and other credible sources, present a higher risk of forced and child labour practices. This geographic risk assessment was combined with an assessment of at-risk goods categories, further enabling us to apply a targeted lens to our risk assessment. Westman will rely on this risk identification process to continue evaluating future purchases.

Risk Assessment Findings

Through the application of the analysis, Westman has been able to identify countries and specific goods with a high inherent risk of forced and child labour. Westman is not aware of any instances of forced labour or child labour in our supply chain at the time of filing this report.

Please refer to Section 2 of this report, which outlines the improvement efforts by Westman's Policy and Procedure department and Procurement staff to mitigate this risk and the related efforts to enhance or update applicable policies or procedures impacted.

4. Remediation of Forced and Child Labour

Westman is not aware of any forced labour or child labour within its operations and supply chain. If Westman identifies or comes across any instance of forced or child labour within our supply chain, we will adhere to the guidance provided by Public Safety Canada and refer to the OECD guidelines to chart an appropriate course of forced or child labour remediation.

5. Remediation of Loss of Income

Westman is not aware of any instances of forced and child labour, and therefore has not identified any vulnerable families that may have experienced a loss of income. If Westman identifies or comes across any instance of forced or child labour within our supply chain, we will adhere to the guidance provided by Public Safety Canada and refer to the OECD guidelines to chart an appropriate course of loss of income remediation.

6. Employee Training

Westman understands the importance of creating awareness amongst its employees of forced and child labour in its supply chains. In addition to Professional Designation requirements, Westman remains focused on educating employees on identifying and responding to risks of forced labour and child labour in supply chains through external training resources.

7. Assessing Effectiveness

Westman is taking action to assess the effectiveness of forced labour and/or child labour in our supply chains. This is done by setting up regular reviews of the organization's policies and procedures and continuous monitoring of supplier attestations for compliance with the Act. Westman is committed to continuous improvement on this subject to ensure transparency and accountability in our supply chain operations.

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8. Approval and Attestation of the Report

In accordance with the requirements of the Act, and in particular Section 11, 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 due 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: Eagle (Bud) Keys

Title: President & CEO

Date: April 21, 2026

Signature:

"I have the authority to bind Westman Media Cooperative Ltd "