



ANNUAL REPORT Bill S-211

This report is made pursuant to Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). The report outlines the approach and initiatives taken by OptConnect Management, LLC (“**OptConnect**”) to identify and address the risks of forced labour and child labour in its business operations and supply chains in the 2025 financial reporting year.

OUR COMMITMENT

OptConnect is committed to promoting and maintaining ethical business practices across all operations. We strictly prohibit the use of forced labour or child labour in the production of the goods we sell. This commitment is explicitly codified in our **January 2025 Associate Handbook** and our standalone **Child and Forced Labor Policy**.

CATEGORIZATION, SECTOR, AND INDUSTRY

OptConnect is an entity under the Act

The Act applies to OptConnect as, in at least one of its two most recent financial years, the company had:

- (1) at least \$20 million in assets; and
- (2) generated at least \$40 million in revenue.

Our Sector and Industry

OptConnect is a provider of managed wireless connectivity solutions. Our global footprint, as of the end of FY 2025, includes subsidiaries Capestone, M2MDataGlobal, and Premier Wireless Solutions (PWS). While these subsidiaries do not individually meet the reporting criteria, OptConnect maintains oversight of the shared supply chain standards described herein.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Our Structure and Activities

OptConnect is a partnership headquartered in Kaysville, Utah. We provide hardware and connectivity services for ATMs, smart safes, digital signage, security, video monitoring, and more. While our primary market is the United States, we support clients with operations in Canada and occasionally import hardware directly into Canada.



Office
877-678-3343
Fax
801-991-9009

Address
865 West 450 North, Suite 1,
Kaysville, UT 84037
Website
www.OptConnect.com



Our Supply Chain

Our supply chain involves the procurement of electronic components (antennas, power supplies, modems) primarily from manufacturers in Asia and Europe. These goods are typically imported into the U.S. for configuration and then distributed to customers globally, including in Canada.

Steps Taken by OptConnect in Prior Financial Years

OptConnect has developed and implemented anti-forced labour and child labour contractual clauses into the company's supply agreements, as well as the terms and conditions of OptConnect's purchase order agreements. Under these clauses, the supplier must represent and warrant that it is acting in compliance with all applicable foreign, federal, state, and local laws. The supplier must also warrant and represent that neither it, nor any of its subcontractors, will use child, slave, prisoner, or any other form of forced or involuntary labour, or engage in abusive employment or corrupt business practices in the supply of products to OptConnect and PWS.

In 2024, OptConnect formally enacted a comprehensive **Child and Forced Labor Policy** and implemented mandatory **compliance training** for all employees. To ensure full organizational alignment, completion of this training was required for 100% of the workforce prior to the conclusion of the 2024 fiscal year.

POLICIES AND DUE DILIGENCE PROCESSES

In the 2025 reporting year, OptConnect further embedded human rights protections into its core management systems:

- **Child and Forced Labor Policy (Section 2.12 of the Associate Handbook):** Formally defines a "child" as any individual under the age of 15 (or the legal minimum working age, whichever is higher). It guarantees that all employment is voluntary and that workers are free to leave upon reasonable notice.
- **Supplier Code of Conduct:** All new suppliers are required to acknowledge our standards, which include prohibitions on the withholding of identity documents and the use of involuntary prison labour.
- **Contractual Accountability:** As specified in our 2025 policy updates, OptConnect reserves the right to conduct audits or investigations to ensure supplier compliance with anti-forced labour standards as a condition of our business relationship.

FORCED LABOUR AND CHILD LABOUR RISKS

We recognize that the electronics sector and specific geographic regions where our components are manufactured present inherent risks. In 2025, we utilized our **Supplier Due Diligence Questionnaire** to begin more granular mapping of our Tier 1 suppliers. While no specific instances of forced or child labour were identified this year, we continue to monitor high-risk categories such as mineral extraction for electronic components.



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REMEDIATION MEASURES

No instances of forced or child labour were identified in our operations or supply chains during this reporting period. Therefore, no remediation of such practices was required. OptConnect maintains a Whistleblower Policy (Section 2.11) that allows associates to report concerns to hr@optconnect.com. This policy guarantees anonymity and strictly prohibits retaliation against any individual who makes a good-faith report.

REMEDIATION OF LOSS OF INCOME

As OptConnect has not identified any instances of forced or child labour, there has been no resulting loss of income to vulnerable families from measures taken to eliminate such practices. Therefore, no income remediation measures have been required.

TRAINING PROVIDED TO EMPLOYEES

In 2025, OptConnect continued its mandatory training program:

- **Scope:** All employees are required to review the **Code of Ethics** and **Child and Forced Labor Policy** as part of their onboarding and annual handbook acknowledgement.
- **Content:** Training focuses on identifying "red flags" of exploitation, understanding international labour standards (ILO), and the internal procedures for reporting suspected violations.
- **Verification:** All associates must provide a signed acknowledgement of the **2025 Associate Handbook**, confirming their understanding of these specific prohibitions.

ASSESSING EFFECTIVENESS

To ensure our policies are effective and not merely performative, OptConnect utilizes the following:

- **Biannual Performance Reviews:** Used as a touchpoint to verify adherence to company ethics and standard conduct policies.
- **Policy Audits:** Management conducts regular reviews of the **Child and Forced Labor Policy** to ensure it remains aligned with evolving Canadian and international legal standards.
- **Supplier Tracking:** We track the percentage of suppliers who have completed the Due Diligence Questionnaire and acknowledged our Code of Conduct.

APPROVAL AND 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.



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IN WITNESS WHEREOF the authorized signing officer(s) of OptConnect Management LLC have executed this report as of the effective date of the signatures set out below.

SIGNED

) **OPTCONNECT MANAGEMENT, LLC**

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5/5/2026 | 14:00 PM PDT

)

Signed by:
CHRISTIE KENT
D5B003ACCAB945D...

)

Date

)

Name: Christie Kent

)

Title: Chief Financial Officer

)

) I have authority to bind OptConnect Management LLC



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