

2024 Forced Labour Report

For the year ending December 31, 2024

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1. Introduction

This report (the “Report”) has been prepared by Beanfield Technologies Inc. (“Beanfield,” the “organization,” “we,” or “our”) for the financial year ending December 31, 2024 (the “Reporting Period”), in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “Act”).

This marks Beanfield’s second report under the Act and outlines the measures we have taken during the Reporting Period to identify, prevent, and mitigate the risks of forced labour and child labour in any part of our business operations or supply chains, whether in Canada or abroad, including goods imported into Canada.

The Report pertains to our Canadian operations that fall within the scope of the Act and details the actions implemented to uphold our commitment to ethical labour practices and to help ensure that forced labour does not occur within our organization or supply chains.

2. Steps to prevent and reduce risks of forced labour and child labour

In 2024, Beanfield took proactive steps to prevent and reduce the risk of forced labour and child labour within its operations and supply chains. These efforts included the development of a Supplier Code of Conduct, which will be rolled out and referenced in our vendor contracts. The Code outlines expectations in key areas, including but not limited to:

- Labour law compliance
- Health and safety requirements
- Environmental responsibilities
- Ethical sourcing practices

- Supplier management systems
- Monitoring and enforcement mechanisms

Internally, we reviewed and enhanced relevant corporate policies, delivered company-wide training to all staff to raise awareness of forced labour risks, and maintained accessible, confidential channels for reporting suspected violations.

These actions underscore Beanfield's commitment to ethical business practices and alignment with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

3. Structure, activities, and supply chains

About Beanfield and Our Commitment to Ethical Business Practices

Founded in 1988, Beanfield Technologies Inc. was built on a simple but powerful mission: to create better-connected communities. From our roots in Toronto, we have expanded our presence to serve major urban centres across Ontario, Montreal, and Vancouver.

As a privately owned and independently operated telecommunications company, backed by a consortium of digital infrastructure investment firms, Beanfield owns and operates one of the largest privately held fibre-optic networks in Canada. We deliver high-quality internet, phone, and television services to both residential and commercial customers, enabling meaningful digital connectivity in the regions we serve.

The principles of connectivity and community are core to our identity. These values shape the way we design, build, and operate our network and inform our commitments to sustainability, inclusion, and community engagement. We believe

our impact extends beyond technology—we strive to uplift the communities we are part of.

To support our operations, Beanfield partners with reputable, industry-leading suppliers across our fibre infrastructure, equipment, and technology needs. As part of our commitment to responsible sourcing, we developed a Supplier Code of Conduct that sets out clear expectations for ethical and lawful conduct. This Code requires our suppliers to adhere to the same high standards of integrity, accountability, and respect for human rights that we uphold internally.

By aligning supplier expectations with those of our employees, we aim to ensure that our supply chain reflects Beanfield's core values of integrity, excellence, and respect for human dignity. This initiative reinforces our proactive stance in mitigating the risks of forced and child labour throughout our supply network.

We are committed to respecting internationally recognized labour and human rights throughout our operations and supply chains. We actively engage our suppliers to promote awareness, compliance, and continuous improvement in line with these standards.

Additionally, we acknowledge the risks associated with sourcing materials and components from regions with varying economic conditions and regulatory oversight. To address these risks, we prioritize transparency and traceability in our procurement activities, selecting suppliers who demonstrate responsible sourcing practices and verifiable supply chain controls.

Together, these efforts form a core part of our strategy to foster strong, transparent, and ethical supplier relationships. By embedding these principles into our procurement and supply chain practices, Beanfield is not only able to deliver superior

service to our customers, but also contribute to a more connected, inclusive, and sustainable future for all.

4. Policies, Governance and Due Diligence processes

Code of Conduct: Beanfield is unwavering in its commitment to operating with the highest ethical standards and in full compliance with all applicable laws, rules, and regulations. We place the utmost value on the integrity of each employee and Company representative, recognizing that their conduct reflects on the entire organization. Our dedication to ethical behavior is non-negotiable, and we expect every member of our team to uphold these principles diligently. Compliance with all relevant laws, rules, and regulations is not just expected but is a fundamental responsibility of every employee. By adhering to these standards, we ensure the trust and respect of our clients, partners, and the wider community, solidifying our reputation as a principled and reliable company.

Recruitment Policy: Beanfield is committed to equal opportunity and fair hiring practices, ensuring that all positions are filled based on the merit of

each candidate's knowledge, skills, abilities, and other competencies. This policy is designed to maintain a consistent, fair, and barrier-free approach to employment, ensuring that every employee and potential candidate is given a fair chance. To create and maintain a safe and inclusive work environment, Beanfield strictly adheres to a policy of not employing individuals under the age of 18. This measure underscores our dedication to safeguarding the well-being of our workforce and upholding the highest standards of safety and ethical conduct. Our hiring processes reflect our commitment to these principles, striving to attract and retain the most qualified individuals who align with our values and contribute to our collective success. By fostering an equitable and supportive work environment, Beanfield not

only complies with legal standards but also champions a culture of respect and excellence.

Respectful Workplace: At Beanfield, we uphold a zero-tolerance policy against bullying, harassment, or any inappropriate comments or conduct that can reasonably cause a person to feel humiliated, intimidated, or embarrassed. This policy applies to everyone, regardless of their position within the company. Demonstrating mutual respect is not just encouraged but is a fundamental core value and essential work expectation at Beanfield. We are committed to fostering a respectful and inclusive environment where all employees feel safe and valued. Any breach of this policy will be addressed promptly and with the utmost seriousness to maintain the integrity and well-being of our workplace.

Integrity Hotline Policy: Beanfield is committed to behavior that is lawful, ethical, and true to our word. Our Directors, Officers, Employees, and Contractors must act in accordance with the letter and spirit of applicable laws, regulations, policies, and Beanfield's public statements.

Exemplifying a high standard of business and personal ethics in the conduct of our duties and responsibilities is not only mandatory for all roles, it's also how it should be. The Integrity Hotline Policy is designed as a mechanism for Beanfield's people to report what they believe, in good faith, to be a material violation of laws, regulations, policies, public statements, or ethics. It ensures the receipt, documentation, retention of records, and resolution of reports received under this Policy and protects whistleblowers from retaliation.

Policy on Forced and Child Labour: Beanfield upholds a zero-tolerance policy toward forced and child labour in all its operations and business relationships, regardless of

geography or partner. We are committed to compliance with applicable laws and international standards addressing forced and child labour.

As part of our ethical sourcing practices, we actively work to prevent the use of forced and child labour across our supplier network. We require our suppliers to take all reasonable and proactive measures to identify, prevent, and remediate instances of forced or child labour—whether occurring directly within their operations or indirectly through their own supply chains.

To reinforce this commitment, we have implemented a Supplier Code of Conduct that sets clear expectations for upholding labour and human rights, including the prohibition of forced and child labour. Should credible concerns arise or evidence of forced, or child labour be identified in the supply chain of a current or prospective supplier, Beanfield will initiate a rigorous investigation and reassess the nature of our business relationship with that supplier.

5. Assessing and managing our risk

Internal: Beanfield assesses the risk of forced and child labour within our internal operations as negligible. Our human resources practices are managed under the leadership of our Chief Human Resources Officer, with additional oversight from the Executive Leadership Team. Recruitment and employment procedures are aligned with Canadian labour laws and standards, reflecting the fact that much of our workforce is based in Canada. We also uphold fundamental labour rights, including the right to freedom of association, consistent with our commitment to fair and ethical employment practices.

Within Our Supply Chain: We recognize that risks of forced, and child labour can exist at various levels of the supply chain. Within our direct supplier relationships,

we assess the risk as minimal given the nature of our industry and our current procurement practices. However, we acknowledge the potential for higher risk among indirect suppliers, where visibility and control may be limited. We are taking further steps to understand and reduce these risks through improved due diligence.

Our approach to procurement is guided by core operational principles that support ethical sourcing and sustainable growth. We expect our suppliers to uphold these principles and adhere to the standards outlined in our Supplier Code of Conduct. This includes a firm commitment to the elimination of forced and child labour. Collaboration with suppliers is essential, and we rely on their cooperation to maintain high levels of integrity, transparency, and compliance throughout our supply chain.

6. Remediation Measures

To date, Beanfield has not identified any instances of forced labour or child labour within our operations or supply chain. As a result, we have not had cause to implement any remedial measures. Nonetheless, we are fully prepared to act should such incidents ever arise. In such cases, we will implement carefully developed remediation strategies aligned with international standards and industry best practices. Our commitment to ethical labour practices is steadfast, and we regularly monitor our operations and supply chain to ensure continued compliance. We are dedicated to fostering a responsible, humane work environment and will respond promptly and decisively to any issues that may emerge.

7. Training

At Beanfield, we are committed to fostering a culture of integrity through continuous education and awareness. All new office employees complete a mandatory onboarding program that includes training on our Code of Ethics, which forms the

foundation of our corporate values and ethical conduct. To ensure these standards are upheld, all office employees are also required to certify their compliance with the Code of Ethics on an annual basis, reinforcing their ongoing commitment to ethical behaviour.

Beanfield provides a company-wide training on forced and child labour as part of our commitment to ethical business practices and human rights. In the past year, we introduced targeted training programs designed to equip employees with the knowledge and tools necessary to identify, prevent, and respond to potential instances of forced or child labour across both our internal operations and supply chain.

By fostering awareness and accountability at all levels of the organization, we aim to build a workforce that is vigilant, informed, and aligned with our values. These efforts reinforce our dedication to upholding ethical standards and safeguarding human rights throughout our business activities.

8. Assessing Effectiveness

At Beanfield, we recognize that addressing the risks of forced and child labour is a continuous journey. While we are confident in the measures we have implemented to date, we are committed to ongoing improvement and the pursuit of the highest standards of integrity, responsibility, and ethical conduct.

Planned Initiatives for the Upcoming Year

To strengthen our efforts in preventing and mitigating forced and child labour risks, we are implementing several key initiatives in the upcoming calendar year:

- **Enhance Our Policy on Forced and Child Labour:**

We have adopted a formal policy that clearly defines our position and procedures regarding forced and child labour. This policy includes strong safeguards and aligns with international standards. Recognizing the need for continuous enhancement, we will review and refine this policy regularly. In addition, we will deliver comprehensive training to all Beanfield employees to ensure they fully understand and can uphold these policies and procedures.

- **Develop and Implement a Comprehensive Supplier Code of Ethics:**

We have created a robust Supplier Code of Ethics that outlines our expectations for ethical conduct and compliance. We will make this code available to all suppliers and gradually roll it out as a condition of doing business with Beanfield. It serves as a foundational tool for aligning supplier practices with our values.

- **Incorporate Ethical Standards into New Employee Orientation:**

We will embed training on forced and child labour risks into our onboarding program and update the employee handbook accordingly. This will ensure all new hires are immediately informed of and aligned with our ethical standards from the outset of their employment.

Monitoring and Evaluation

Beanfield is committed to evaluating the effectiveness of these initiatives over time. We will monitor our progress in reducing the risk of forced and child labour in our operations and supply chains and make data-driven adjustments as needed. This ongoing assessment underscores our dedication to ethical business practices and the continuous improvement of our impact.

9. Approval & Attestation

This report was approved by the Board of Directors of Beanfield for the year ending December 31, 2024, in accordance with subparagraph 11(4)(a) 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 listed above. To the best of my knowledge, and after

having exercised due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Beanfield Technologies Inc.

Per: 

Full Name: Rizwan Jamal
Title: Board Director & CEO
Date: May 30, 2025