

2025 Forced Labour Report

For the year ending December 31, 2025

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1. Introduction

This report has been prepared jointly by Beanfield Technologies Inc. and its subsidiaries, including Beanfield Fibre 1 L.P. (collectively, "Beanfield," the "organization," "we," or "our") for the financial year ending December 31, 2025 (the "Reporting Period"), in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (S.C. 2023, c. 9) (the "Act"). This report is filed on behalf of all entities within the Beanfield corporate group pursuant to subsection 11(2) of the Act.

This marks Beanfield's third 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 and child labour do not occur within our organization or supply chains.

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

In our 2024 Forced Labour Report, Beanfield identified three planned initiatives for the upcoming year: (1) enhance our Policy on Forced and Child Labour; (2) develop and implement a comprehensive Supplier Code of Conduct; and (3) incorporate ethical standards into new employee orientation. We are pleased to report that all three initiatives were completed during the Reporting Period, as described below.

In 2025, Beanfield continued to build on the foundation established in prior reporting years, taking further proactive steps to prevent and reduce the risk of forced labour and child labour within its operations and supply chains. Key initiatives undertaken during the Reporting Period included the following:

- **Enhanced Policy on Forced and Child Labour:** We completed a comprehensive review of our Policy on Forced and Child Labour, strengthening its alignment with international standards and incorporating additional safeguards and procedural requirements. This review ensured that the Policy reflects current best practices and addresses emerging risks in our industry and supply chain.
- **Supplier Code of Conduct:** Building on the supplier code developed in 2024, we finalized and implemented a comprehensive Supplier Code of Conduct that outlines our expectations for ethical conduct and compliance across our supplier network. During the Reporting Period, this Code was distributed to our top 25 suppliers, establishing clear standards in areas including, but not limited to: labour law compliance, health and safety requirements, environmental responsibilities, ethical sourcing practices, prohibition of forced and child labour, supplier management systems, and monitoring and enforcement mechanisms.
- **Training:** We delivered company-wide training on forced and child labour to all employees, achieving a 94.4% completion rate. This training equipped employees with the knowledge and tools to identify, prevent, and respond to potential instances of forced or child labour across both our internal operations and supply chain.
- **Ethical Standards in Employee Onboarding:** We incorporated training on forced and child labour risks and ethical standards into our new employee orientation program and updated the employee handbook accordingly, ensuring all new hires are aligned with our ethical standards from the outset of their employment.

Internally, we continued to maintain accessible, confidential channels for reporting suspected violations, including our Integrity Hotline. This mechanism allows employees, contractors, and other stakeholders to raise concerns in good faith

without fear of retaliation, and all reports are documented, investigated, and resolved in accordance with our Integrity Hotline Policy.

These actions reflect Beanfield's ongoing commitment to ethical business practices and alignment with the requirements of the 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.

Our Supply Chains

To support our operations, Beanfield procures goods from reputable, industry-leading suppliers across our fibre infrastructure, network equipment, and technology needs. The primary categories of goods we source include:

- Fibre-optic cable

- Networking hardware and electronics
- Customer premises equipment
- Construction materials used in network deployment

As part of our commitment to responsible sourcing, we have implemented 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.

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.

We acknowledge the risks associated with sourcing goods 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.

4. Policies, Governance and Due Diligence processes

Beanfield has established a governance framework and a suite of policies and due diligence processes designed to identify, prevent, and mitigate the risks of forced labour and child labour across our operations and supply chains. The following subsections describe the key elements of this framework as maintained and applied during the Reporting Period.



Governance Structure

Beanfield's forced labour and child labour risk management program is led by our Chief Human Resources Officer (CHRO), with oversight from the Executive Leadership Team. The CHRO is responsible for coordinating the organization's efforts to identify, prevent, and mitigate forced labour risks across our operations and supply chains, and reports to the Board of Directors on an annual basis regarding the program's activities, findings, and areas for improvement.

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 a fundamental responsibility of every employee.

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. 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. Our hiring processes reflect our commitment to attracting and retaining qualified individuals who align with our values.

Respectful Workplace

At Beanfield, we uphold a zero-tolerance policy against bullying, violence, 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 a fundamental core value and an essential work expectation at Beanfield.

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. 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.



Supplier Code of Conduct

During the Reporting Period, Beanfield finalized and implemented a comprehensive Supplier Code of Conduct. This Code outlines our expectations for ethical conduct and compliance across all areas of our supplier relationships, including labour practices, human rights, health and safety, environmental stewardship, and business integrity. The Code was distributed to our top 25 suppliers, and we are committed to expanding its distribution to a broader base of suppliers in upcoming reporting periods. The Supplier Code of Conduct is being incorporated as a condition of doing business with Beanfield, establishing a clear and enforceable standard for all current and prospective suppliers.

5. Assessing and managing our risk

Beanfield takes a structured approach to assessing and managing the risks of forced labour and child labour across both our internal operations and our supply chain. Our risk assessment framework is informed by the nature of our business activities, the geographic profile of our workforce and suppliers, and the categories of goods we procure.

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 and annual reporting to the Board of Directors. Recruitment and employment procedures are aligned with Canadian labour laws and standards, reflecting the fact that 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, particularly where goods or components originate from regions with less stringent regulatory oversight.

We are taking further steps to understand and reduce these risks through improved due diligence, including the distribution of our Supplier Code of Conduct to our top 25 suppliers and our commitment to expanding this distribution in the coming year.

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

Remediation of Forced Labour and Child Labour

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. We regularly monitor our operations and supply chain to ensure continued compliance and will respond promptly and decisively to any issues that may emerge.



Remediation of Loss of Income

As no instances of forced labour or child labour have been identified within our operations or supply chain during the Reporting Period or in any prior reporting period, no measures were required to remediate the loss of income to vulnerable families that may result from measures taken to eliminate the use of forced or child labour. Should such circumstances arise in the future, Beanfield is committed to taking appropriate steps to address the impact on affected individuals and families, in accordance with international standards and best practices.

7. Training

At Beanfield, we are committed to building a culture of integrity through continuous education and awareness across all levels of the organization.

Company-Wide Training

During the Reporting Period, Beanfield delivered company-wide training on forced and child labour as part of our commitment to ethical business practices and human rights. This training was completed by 94.4% of employees across all roles and departments, including both office-based and field staff. The training was 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.

All employees are required to certify their compliance with the forced and child labour training on an annual basis, reinforcing their ongoing commitment to ethical behaviour. This annual certification process ensures that each employee acknowledges and reaffirms their understanding of the ethical standards expected of them, including those related to the prohibition of forced and child labour.



New Employee Onboarding

During the Reporting Period, we incorporated training on forced and child labour risks into our new employee orientation program and updated the employee handbook accordingly. This ensures that all new hires are immediately informed of and aligned with our ethical standards from the outset of their employment. By embedding these principles into the onboarding process, we reinforce the expectation that every individual joining Beanfield shares responsibility for upholding our commitment to human rights and lawful labour practices.

By promoting awareness and accountability at all levels of the organization, we aim to maintain a workforce that is informed, vigilant, and aligned with our values and obligations under the Act.

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.

During the Reporting Period, we assessed the effectiveness of our efforts through the following measures:

- Training completion: 94.4% of employees completed forced and child labour training during the Reporting Period.
- Supplier Code of Conduct distribution: The Code was distributed to our top 25 suppliers during the Reporting Period.
- Integrity Hotline monitoring: We continued to monitor reports received through our Integrity Hotline. No reports related to forced or child labour were received during the Reporting Period.

- Forced and child labour certification: All employees completed their annual forced and child labour training certification.
- Policy review: Our Policy on Forced and Child Labour was reviewed and strengthened during the Reporting Period.

Planned Initiatives for the Upcoming Year

To continue strengthening our efforts in preventing and mitigating forced and child labour risks, we are planning the following initiatives in the upcoming calendar year:

- Expand Supplier Code of Conduct Distribution: We will broaden the distribution of our Supplier Code of Conduct to an expanded base of suppliers beyond the top 25, with the objective of establishing these standards across a greater proportion of our supply chain.
- Continue Monitoring and Improvement: We will continue to monitor the effectiveness of our forced and child labour prevention measures and make improvements where warranted. This includes ongoing review of our policies, supplier engagement practices, and internal controls.
- Deepen Training Programs: We will continue to refine and deepen our training programs on forced and child labour, including the development of additional resources and the exploration of targeted training for employees in procurement and supply chain management roles.

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.



9. Approval & Attestation

This report was approved by the Board of Directors of Beanfield Technologies Inc. for the year ending December 31, 2025, 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. Based on my knowledge, and having exercised reasonable 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.
and its subsidiaries, including Beanfield Fibre 1 L.P.**

Per: 
Rizwan Jamal (May 28, 2026 17:21:28 EDT)

Full Name: Rizwan Jamal

Title: Board Director & CEO

Date: May 28, 2026