



**REPORT PURSUANT TO CANADA'S
FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT
FOR CALENDAR YEAR ENDED DECEMBER 31, 2023**

1. Introduction.....	2
2. Organizational Structure, Activities, and Supply Chain.....	2
3. Policies and Due Diligence Related to Forced Labour and Child Labour	3
4. Remediation Measures	5
5. Approval and Attestation.....	5

1. Introduction

This is the first joint report prepared by Vecima Networks Inc. (“Vecima”) and certain of its subsidiaries pursuant to Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial reporting year ended June 30, 2023. Vecima is committed to upholding fair labour practices and conducting business responsibly, ethically, and with a strong commitment to human rights. This report details the measures Vecima has taken to evaluate and mitigate the risks of forced labour and child labour within its operations.

This report covers Vecima and the following entities, each of which is directly or indirectly owned by Vecima: Vecima Technology (Canada), Inc.; Vecima Technology Inc.; Vecima Technology (UK) Ltd.; Vecima Technology GmbH; Vecima Technology B.V.; Vecima Technology (Qingdao) Co. Ltd.; Vecima Technology (Shanghai) Co. Ltd.; and Vecima Solutions Corporation.

2. Organizational Structure, Activities, and Supply Chain

Vecima is a Canadian company founded in 1988 in Saskatoon, Saskatchewan. Today, Vecima has a global presence with offices in Victoria, Burnaby, Duluth, Raleigh, San Jose, Qingdao, Shanghai, Tokyo, Amsterdam, and manufacturing and research and development facilities in Saskatoon. Vecima is headquartered in Victoria, British Columbia.

Vecima builds technologies that provide internet video delivery and storage (IPTV) and next-generation high-speed broadband network access. The business is organized into three segments: Video and Broadband Solutions; Content Delivery and Storage; and Telematics.

1) Video and Broadband Solutions includes platforms that process data from the cable network and deliver high-speed internet connectivity to homes over cable and fiber as well as adapt video services to formats suitable to be consumed on televisions in commercial properties.

2) Content Delivery and Storage includes solutions and software, under the MediaScale brand, for service providers and content owners that focus on ingesting, producing, storing, delivering and streaming video for live linear, Video on Demand, network Digital Video Recorder and time-shifted services over the internet.

3) Telematics provides fleet managers with the key information and analytics they require to optimally manage their mobile and fixed assets under the Contigo and Nero Global Tracking brands. Vecima’s telematics solutions allow fleets and high-value assets to be tracked, managed, reported on, and optimized over a subscription-based cloud portal serving commercial and municipal government customers.

Supply chains are key to Vecima’s ability to enhance customer’s networks and deliver faster speeds, improved video quality, and new services to their end users. Suppliers supplement certain aspects of Vecima’s operations by providing goods and services related to product manufacturing and support for general operations. Vecima’s

supply chain team leverages a centralized enterprise resource planning system to manage the procurement of goods and services across multiple regions and monitor compliance with policies and procedures, including Vecima's Supplier Code of Conduct.

Since Vecima procures third-party goods and services, we acknowledge the risks that forced labour and child labour may exist either directly or indirectly through subsequent tiers in our supply chains. The U.S. Department of Labor's *List of Goods Produced by Child Labor or Forced Labor* is an annual publication that helps identify such risks. A sizable portion of Vecima's procurement of tangible goods relates to electronic products and their constituent parts. According to the U.S. Department of Labor, products in this category manufactured or assembled outside of North America may be at higher risk of involving forced labour and child labour.

Vecima is steadfast in its commitment to maintaining high standards of compliance and risk management. To that end, Vecima's management team has undertaken various initiatives aimed at promoting ethical behavior among its employees and suppliers to ensure they are equipped to meet Vecima's policies concerning forced labour and child labour. Vecima's Board of Directors, through its various committees, ensures adherence to these policies.

3. Policies and Due Diligence Related to Forced Labour and Child Labour

Vecima has implemented the following policies, procedures and due diligence processes that relate to the issues of forced labour and child labour:

Supplier Code of Conduct

Vecima has adopted the Supplier Code of Conduct (the "SCOC") requiring all suppliers to uphold the policies of Vecima concerning compliance with applicable law, respect for human rights, environmental conservation, and the safety of products and services. Vecima has adopted the Electronic Industry Citizenship Coalition's (EICC) Code of Conduct as its code of conduct for suppliers. The Code consists of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D outlines the elements of an acceptable system to manage conformity to this Code. Section E adds standards relating to business ethics. Participants of the EICC Code of Conduct must regard the code as a total supply chain initiative. At a minimum, suppliers shall also require next tier suppliers to acknowledge and implement the SCOC. Vecima also follows EICC requirements by auditing contract manufacturers at least bi-annually or sooner if required. For all other suppliers, Vecima reserves the right to perform random audits. At the time of implementation, Vecima has asked all active suppliers to acknowledge the SCOC or has reviewed the terms of suppliers own code of conduct to ensure it meets or exceeds the requirements set out in Vecima's SCOC.

Whistleblower Policy

Vecima's Whistle Blower Policy provides a mechanism to report misconduct and illegal activities, including activities related to forced labour or child labour. Each director, officer and employee has a responsibility under

the Whistleblower Policy to promptly report suspected misconduct, illegal activities, or other violations of federal, provincial and state laws, rules or regulations, or violations of Vecima's Code of Business Conduct and Ethics in accordance with the provisions of the Whistleblower Policy. Any other third party, such as vendors, consumers, shareholders or competitors may also submit in a report pursuant to the procedures provided in the Whistleblower Policy. In order to facilitate the reporting of misconduct, Vecima's Corporate Secretary, in conjunction with the Audit Committee, has established procedures for: (i) the confidential, anonymous submission of reports of misconduct by directors, officers and employees; and (ii) the receipt, retention and treatment of such reports.

Vecima's Code of Business Conduct and Ethics

Vecima is committed to high standards of ethical, moral, and legal business conduct. Accordingly, Vecima's Code of Business Conduct and Ethics (the "Code") has been adopted to help Vecima's personnel meet these standards. All directors, officers, and employees of Vecima and its subsidiaries must conduct themselves in accordance with the Code. Vecima acknowledges that adherence to this Code is critical to operational success and inspires trust and confidence on the part of our employees, customers, shareholders, the public, and other stakeholders. The purpose of the Code is to deter wrongdoing and to promote, in part: honest and ethical conduct; compliance with laws, rules and regulations; prompt internal reporting of violations of the Code; and accountability for adherence to the Code. Vecima aims to include more specific statements into the Code relating to its commitment to human rights and the risks associated with force labour and child labour.

Terms and Conditions for Vendors

Vecima reviews supplier agreements for obligations and representations concerning compliance with applicable laws and regulations. Vecima's contract templates relating to procurement of goods and services also includes such statements. Vecima intends to include standard contractual terms addressing issues specifically related to forced labour and child labour in future procurement contract templates.

Training

Vecima employees receive copies of the Code of Business Conduct and Ethics as part of the onboarding process and requires all employees to adhere to the Code throughout the course of their employment. Vecima intends to incorporate training regarding the awareness and prevention of forced labour and child labour into the onboarding process for employees directly involved in Vecima's procurement and supply chain processes.

Monitoring Effectiveness

In 2022, Vecima conducted an internal review of certain policies and procedures and ultimately engage an external partner to assist Vecima in improving corporate responsibility through Environmental, Social, and Governance ("ESG") principles. Vecima intends to further review risks associated with force labour and child labour in accordance with these principles.

4. Remediation Measures

At the time of submission of this report, Vecima has not identified any instances of forced labour or child labour in its supply chain. Accordingly, no measures are required or have been undertaken to remedy or rectify instances of forced labour or child labour in Vecima's supply chains.

5. 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 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. For clarity, I have provided the attestation above in my capacity as a director and officer of Vecima Networks Inc. and not in my personal capacity. I have the authority to bind Vecima Networks Inc.



[Sumit Kumar \(May 31, 2024 14:37 PDT\)](#)

Signature

Sumit Kumar

Name

Chief Executive Officer; Director

Title

May 31, 2024

Date