

#### Forced Labour and Child Labour in Supply Chains Act.

#### **Annual Report**

May 23, 2025

#### Part 1 - Submission information

- 1. This report is for: (Mandatory)
  - An entity
- 2. State the legal name of the reporting entity or government institution (Mandatory)
  - Total Telcom Inc.
- 3. Reporting year (Mandatory)

Select from the drop down menu the applicable reporting deadline for which you are submitting a report:

- May 31, 2025
- 4. Financial year covered by report (Mandatory)
  - July 1, 2024 to June 30, 2025
- 5. Is this a revised version of a report that was already submitted this reporting year? (Mandatory)
  - No
- 6. For entities only: Business number(s) (if applicable, provide the business number of the entity completing this questionnaire):
  - 898999230 RT0001
- 7. For entities only: Is this a joint report? (Mandatory)
  - No

- 8. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Mandatory)
  - · No
- 9. For entities only: Which of the following categories apply to the entity? (Mandatory)
  - Listed on a stock exchange in Canada
  - Canadian business presence:
    - Has a place of business in Canada
    - Does business in Canada
    - Has assets in Canada
- 10. For entities only: In which of the following sectors or industries does the entity operate? Select all that apply. (Mandatory)
  - Agriculture, forestry, fishing and hunting
    - Support activities for agriculture and forestry
  - Mining, quarrying, and oil and gas extraction
    - Support activities for mining, and oil and gas extraction
  - Utilities
  - Manufacturing
    - Computer and electronic product manufacturing
  - Information and cultural industries
    - Computing infrastructure providers, data processing, web hosting, and related services
  - Professional, scientific and technical services
- 11. For entities only: In which country is the entity headquartered or principally located? (Mandatory)
  - Canada
- 11.1 If in Canada: In which province or territory is the entity headquartered or principally located? (Mandatory)
  - British Columbia
- Part 2 Annual Report

Reporting for entities

### 1. Which of the following accurately describes the entity's structure? (Mandatory)

Corporation

### 2. Which of the following accurately describes the entity's activities? Select all that apply. (Mandatory)

Note: If an organization is not involved in any of the following activities, then it may not be required to report, even if it meets the definition of **entity**.

- Producing goods (includes manufacturing, extracting, growing and processing), in Canada
- Importing into Canada goods produced outside Canada
- 3. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Mandatory)
  - Mapping activities
  - Mapping supply chains
  - Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
  - Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
  - Monitoring suppliers

#### 4. Please provide additional information describing the steps taken.

Total Telcom Inc., through its wholly owned subsidiary designs and manufactures electrical devices for control and remote monitoring systems. While we recognize that the electrical components we use typically require sophisticated manufacturing techniques not typically associated with forced or child labour, there remains a risk associated in the downstream raw materials used to make such components. The focus on our initiatives is to verify that our suppliers align with our zero tolerance in the use of forced or child labour.

- 5. Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour? (Mandatory)
  - Yes

# 5.1 If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Mandatory)

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships
- 6. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Mandatory)
  - Yes, we have identified parts of our activities and/or supply chains that carry risks to the best of our knowledge and will continue to identify emerging risks.
- 6.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Mandatory)
  - The sector or industry it operates in
  - The types of products it produces or imports
  - The types of products it sources
  - The raw materials or commodities used in its supply chains
  - Tier one (direct) suppliers
  - Tier two suppliers
  - Tier three suppliers
- 7. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Mandatory)
  - Manufacturing
    - o Computer and electronic product manufacturing
- 8. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable)

While we recognize that the electrical components we use typically require sophisticated manufacturing techniques not typically associated with forced or child labour, there remains a risk associated in the downstream raw materials used to make such components. Total Telcom Inc. does not tolerate the use of child labour, forced labour, or

human trafficking in any form and will never knowingly use suppliers that do not share these values. Management recognizes the importance of working with our suppliers to help mitigate such risks, and uses the following process to help evaluate existing and future suppliers: 1. A public search is done on all suppliers for documented policies regarding child labour, forced labour, or human trafficking. The results are recorded and if not found to be satisfactory, then: 2. Correspondence is initiated to obtain policies directly from the supplier and/or the original manufacturer. If this is still not satisfactory, then: 3. Management will review the supplier/manufacturer and evaluate the risks associated with continued use of the supplier based on composition of component, origin of the supplied component, and alternative suppliers.

- 9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Mandatory)
  - Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.
- 10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Mandatory)
  - Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.
- 11. Does the entity currently provide training to employees on forced labour and/or child labour? (Mandatory)
  - Yes
- 11.1 If yes, is the training mandatory? (Mandatory)
  - Yes, the training is mandatory for employees making contracting or purchasing decisions.
- 12. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Mandatory)
  - Yes

## 12.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Mandatory)

• Setting up a regular review or audit of the entity's policies and procedures related to forced labour and child labour

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of CEO, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

"I have the authority to bind Total Telcom Inc."

Neil Magrath, CEO