



**Annual Report**

**Bill S-211**

***Fighting Against Forced Labour and Child  
Labour in Supply Chains Act***

## **1. Statement of Commitment**

Wightman Communications Ltd. (“Wightman”) is filing a single entity report as at May 31, 2024, in accordance with the *Fighting Against Forced Labour and Child Labour Act* (the “Act”).

Wightman is diligent in ensuring processes are in place to guard against any human rights abuses, specifically forced or child labour, as being a part of the Wightman supply chain.

Wightman abides by all relevant laws respecting human rights in our operations, including being aware of the activities in our supply chain for materials sourced globally. Wightman has adopted best practices in our procurement activities to ensure internationally respected guidelines for Human Rights are achieved. Wightman will monitor our supply chain for instances of child, forced or compulsory labour and for evidence of human trafficking or slavery. We will inform our suppliers that we will not tolerate these abuses in our supply chain.

### **1.1. Business & Supply Chain Overview**

Deeply embedded in the communities it serves, Wightman has been providing telecommunication services for over 115 years. Today, Wightman provides TV, internet, mobile, and phone services to residential and business customers across Western Ontario.

As a service provider, Wightman procures a wide range of goods and services from suppliers that manufacture products such as internet modems and other electronic equipment. Wightman does not own any factories or manufacturing facilities, nor do we produce, manufacture, or sell wholesale products.

## **2. Policies and Practices**

Wightman is committed to promoting human rights across our operations, supply chain, and stakeholder interactions and is dedicated to ethical practices in compliance with Canadian human rights laws and international declarations.

To support and enable our commitment to a respectful and ethical environment free of forced labour and/or child labour by additional internal policies including:

- Overtime, working hours, and premiums policies;
- Policy and mandatory training on workplace violence and harassment;
- Mandatory training on Human Rights in Canada.

### **3. Due Diligence**

Wightman is committed to implementing sustainable supply chain management practices and ensuring that our suppliers uphold the same standards as we do within the Wightman organization. This includes proactively engaging suppliers to commit and adhere to all human rights standards.

Wightman continues to be dedicated to collaborating closely with our people, suppliers, and stakeholders to continually enhance and fortify our due diligence approach.

### **4. Actions Taken and Measures Being Implemented**

The following steps are implemented to mitigate or guard against any risk of Human Rights abuses or Forced or Child Labour being present in Wightman's supply chain:

#### **(A) Information & Education**

Information and training has been provided to those employees with responsibilities in Supply Chain and other personnel related to procurement activities on the following:

- An overview of Bill S-211 and the requirements under this legislation;
- Definitions of Forced Labour, Child Labour and Human Trafficking;
- Wightman Policy and compliance plan related to this;
- What to do if a concern arises in terms of compliance.

#### **(B) Procurement Guidelines**

All suppliers will be notified of the expectations of being an approved Wightman supplier and will be provided with an annual questionnaire. This questionnaire will contain elements related to Forced and Child Labour. Supplier responses are tracked.

Wightman Supply Chain will only use Wightman approved suppliers to mitigate potential risk for forced or child labour.

Any new supplier must go through a process to be approved by Wightman which includes being provided with the above-mentioned questionnaire.

#### **(C) Procurement Questionnaire**

Wightman will monitor and ascertain the actual situation about negative human rights impacts in its business activities by conducting a human rights questionnaire for all international suppliers and from analysis of the questionnaire results.

(D) Monitor Effectiveness

Wightman will assess the effectiveness of the measures implemented for ensuring that forced labour and child labour are not being used in our business and supply chain by reviewing supplier scores from the Procurement Questionnaire.

(E) Countermeasures

Wightman will respond appropriately to any negative impacts its' business activities may have on human rights, including forced or child labour. If a negative impact is suspected or verified to be present, Wightman will take measures to source an alternate or new supplier.

**5. Attestation**

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report 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.



**Rob Figliuzzi**

President & CEO

May 31, 2024