



**Tech
Insights**

Modern Slavery Policy

May 2024

1.0 Purpose

TechInsights conducts its business professionally, with integrity and in compliance with the laws of those jurisdictions in which it operates. Our reputation for acting fairly is built on our values as a company and the values of our employees. The Company has a zero-tolerance approach to modern slavery, including child labor and the purpose of this Modern Slavery Policy is to set out our responsibilities, and the responsibilities of those working for us, to support this commitment, and to provide information and guidance to help you to recognize when an issue arises and how to deal with it.

2.0 Scope

This policy applies to all TechInsights employees (whether permanent or temporary, or full or part-time), contractors, officers, and directors of TechInsights, its subsidiaries and joint venture companies under TechInsights' control.

Third parties acting on behalf or in the name of TechInsights, including agents, representatives, subcontractors, suppliers, vendors, joint venture partners and other intermediaries, are required to act consistently with this policy. Joint venture companies not under TechInsights' control, and our joint venture partners, are encouraged to adopt similar policies and procedures to prevent modern slavery.

3.0 Definitions

TechInsights means TechInsights Inc. and its subsidiaries and affiliates.

Modern slavery takes many forms. The most common are:

- **Human trafficking.** The use of violence, threats, or coercion to transport, recruit, or harbor people in order to exploit them for purposes such as forced prostitution, labor, criminality, marriage, or organ removal.
- **Forced labor.** Any work or services people are forced to do against their will, usually under threat of punishment.
- **Debt bondage/bonded labor.** The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.
- **Descent-based slavery** (where people are born into slavery). A very old form of slavery, where people are treated as property, and their "slave" status has been passed down the maternal line.
- **Child slavery.** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage, and child domestic slavery.

3.0 Definitions

- **Child labor.** Labor or services provided or offered to be provided by persons under the age of 18 years and is mentally, physically, socially, or morally dangerous and harmful to children; and/or interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.
- **Forced and early marriage.** When someone is married against their will and cannot leave. Most child marriages can be considered slavery.
- **Domestic servitude.** Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person's home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

4.0 Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The company has a zero-tolerance approach to modern slavery, including child labor, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and child labor throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 and Fighting Against Forced Labor and Child Labor in Supply Chains Act .

In accordance with this policy, and with relevant laws and regulations, TechInsights shall:

- Maintain systems and controls in relation to slavery and human trafficking, including but not limited to a [Supplier Code of Conduct](#).
- Perform supplier due diligence and risk assessment.
- Provide training for relevant employees to enable them to carry out their responsibilities in compliance with this policy. Provide appropriate mechanisms for employees to report or otherwise voice their concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage, and to protect those who do so.
- Maintain an up-to-date Modern Slavery Statement on our website.
- Comply with other reporting obligations as required by applicable laws.
- Communicate this policy to our business partners including agents, suppliers, contractors, and joint venture partners.

4.0 Policy

4.1. Responsibility for this Policy

The TechInsights CEO, with the assistance of the Legal and Compliance team, is responsible for ensuring that this policy complies with our legal and ethical obligations, and for reporting at least annually to the Board of Directors on its operation. The TechInsights' Legal and Compliance team has primary responsibility for implementing this policy, and for dealing with any queries on its interpretation.

4.2. Monitoring and Review

We will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular reviews to provide assurance that they are effective in countering modern slavery.

We invite you to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to TechInsights' Legal and Compliance team: compliance@techinsights.com.

5.0 Procedures

As part of your normal duties, you are expected to do the following:

- a. Read, understand, and comply with this policy.
- b. Participate in any modern slavery training provided by TechInsights.
- c. Immediately report any concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains.
- d. Immediately report any breaches of policies and procedures which may come to your attention.

5.1. Reporting

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager and Legal and Compliance team (compliance@techinsights.com) OR report it in accordance with our Whistleblowing Policy as soon as possible.

5.0 Procedures

5.1. Reporting

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager and Legal and Compliance team (compliance@techinsights.com).

5.2. Protection

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied by your manager, and you are an employee, you should raise it to the Legal and Compliance team. If you still believe that the matter is not remedied, you should raise it formally using our Whistleblower and Confidential Reporting Policy.

5.3. Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. All appropriate suppliers are required to comply with our [Supplier Code of Conduct](#), which includes prohibitions on modern slavery.

5.4. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy or do not adhere to our [Supplier Code of Conduct](#).

5.0 Procedures

5.5. Further Information

Employees should read and regularly consult TechInsights' Modern Slavery Policy and other related policies which are located on TechWorks and may, in addition, speak to the Legal and Compliance team, CEO, or CFO for further information.

6.0 Reference Documents

Document Title	Location
<u>CORP - 401 - Whistleblower and Confidential Reporting Policy.docx</u>	TechWorks - Policy Index
<u>Supplier Code of Conduct</u>	TechInsights public website – Ethics and Compliance page

7.0 Document Versions

#	Revision Description	Section #	Date Revised	Date Approved	Approved By
1.0.	<u>Original Version</u>	N/A	N/A	March, 2024	General Counsel

** All TechInsights policies may be amended at any time*

Tech Insights



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TechInsights

1891 Robertson Road
Suite 500
Ottawa, Ontario K2H 5B7
Canada

T: 1-877-826-4447
Website: www.techinsights.com
Email: info@techinsights.com