

LEADING GLOBAL PROVIDER OF COMMERCIAL GRADE MOBILE AUTO-DEPLOYING SATELLITE ANTENNA SYSTEMS

Report Pursuant to the Government of Canada's "Fighting Against Forced and Child Labour in Supply Chains" Act

> C-COM SATELLITE SYSTEMS INC. WWW.C-COMSAT.COM

About this report

This is a report by C-COM Satellite Systems Inc. prepared in compliance with the Canadian Federal Government's "Fighting Against Forced Labour and Child Labour in Supply Chains Act" (the "Act") for the year covering December 1 2022 to November 20, 2023. Note that the policies and descriptions contained herein are applicable to C-COM Inc. Satellite Systems Inc. (hereinafter "C-COM").

About C-COM Satellite Systems Inc.

C-COM Satellite Systems Inc. is a leader in the design and sale of commercial grade mobile auto-deploying satellite-based technology for the delivery of two-way high-speed Internet, VoIP and Video services into vehicles.

C-COM was federally incorporated on December 9, 1997. The company has no subsidiaries and employs 33 people. C-COM's head office is located at 2574 Sheffield Rd., Ottawa, Ontario, Canada. The company also has an office in Waterloo Ontario that serves as its research and development branch.

The Company is publicly traded on the Canadian Venture Exchange **(TSXV: CMI)** and on the US OTC Exchange **(OTCQB: CYSNF)**. Its fiscal year end is November 30th.

Through its worldwide reseller network of 600+ dedicated resellers and systems integrators, C-COM has deployed over 10,000 antenna systems in over 100 countries. C-COM does not manufacture its antenna systems. Instead, it contracts out to a small group of custom manufacturers ("CM's") – all of whom are located in North America.

C-COM has designed over 30 different antenna systems to support GEO and LEO satellites operating in Ka, Ku, C and X-band services, with several further variations in various stages of design and production. C-COM is seeing strong demand for lightweight, transportable Ka/Ku and X-band Flyaway antennas for a variety of vertical worldwide markets such as satellite news gathering, cellular backhaul, military and disaster management.



C-COM has developed a unique proprietary Mobile auto-deploying (iNetVu®) antenna that allows the delivery of high-speed satellite-based Internet services into vehicles while stationary virtually anywhere where one can drive.



The iNetVu Mobile antenna has also been adapted to be deployable from transportable platforms. The Company's satellite-based products and services deliver high-quality, cost-effective solutions for both fixed and mobile applications throughout the world. More information is available at: <u>www.c-comsat.com</u>.



Executives and Officers

- Dr. Leslie Klein, Chief Executive Officer
- Bilal Awada, Chief Technology Officer
- Art Slaughter, Chief Financial Officer

Structure, Activities and Supply Chains

Supply chains play a pivotal role in C-COM's operations. The components we purchase are used by our CM's to build our satellite antenna systems.

In 2023, our supply chains were comprised of companies specializing in telecommunications. The main countries where C-COM's suppliers are located is in North America.

In addition, we have determined that some of the products purchased from our suppliers contain components manufactured in other countries – none of them identified by the UN as a high-risk modern day slavery nation.

Operational and reputational risk is managed in an effective and balanced way by the company's senior management team. This includes monitoring risks related to supply chain as well as risks related to ethics, fraud and corruption. All employees across every unit, function and level of the organization have a responsibility to manage risk.

We have exercised reasonable due diligence by implementing supply chain risk monitoring proportionate to the purchases made, most notably by imposing extra conditions, such as a "know your supplier" (KYS) due diligence to ensure they comply with our values, policies and Code of Ethics.



C-COM Suppliers

During 2023, C-COM dealt with a total of 370 suppliers located around the globe. The vast majority were located in North America:

During 2023, C-COM spent \$11.9 million on these 370 suppliers world-wide. The vast majority of the dollars were incurred with North American suppliers:



The modern-day Slavery Index was published by the United Nations Office for the Coordination of Humanitarian Affairs (OCHA). Its 2023 report reveals that the number of people living in modern slavery has grown since 2018 against a backdrop of increasing and more complex conflicts, widespread environmental degradation, climate-induced migration, a global rollback of women's rights, and the economic and social impacts of the COVID-19 pandemic.

The latest Global Slavery Index lists these 10 countries with the highest prevalence of modern slavery:

- 1. North Korea
- 2. Eritrea
- 3. Mauritania
- 4. Saudi Arabia
- 5. Türkiye

- 6. Tajikistan
- 7. United Arab Emirates
- 8. Russia
- 9. Afghanistan
- 10. Kuwait

None of C-COM's active suppliers are domiciled in these ten countries.

Policies and due diligence processes in relation to forced labour and child labour.

POLICIES AND PROCESSES IMPLEMENTED

At C-COM, we apply due diligence practices aligned with the risks involved in our activities, our supply chains and our business relationships in a manner conducive to responsible conduct.

Our policies and commitments specifically address human rights, health and safety, diversity and inclusion, the environment and corruption. We embrace a zero-tolerance stance to human rights violations.

Human rights considerations are systematically taken into account in the strategic decisions made at the senior management level. These include decisions related to updates to our internal policies, new product development and employees' work conditions.

From a governance standpoint, a multidisciplinary procurement group has been in operation for many years at C-COM. It meets weekly.



RISK OF FORCED LABOUR OR CHILD LABOUR IN OUR SUPPLY CHAINS AND STEPS TAKEN TO ASSESS AND MANAGE THE RISK

In order to assess the risk of forced labour and child labour in our supply chains, we mapped the risks of our active product suppliers in the jurisdictions where we source products as part of our operations.

The mapping process is based on an external risk analysis carried out through a comparison to the UN's Global Slavery Index. These other factors were taken into consideration:

- Industry-related risks
- Product-related risks
- Country-related risks
- Complexity of the supplier's supply chain

Our risk assessment focused on key suppliers to ensure the scope and scale were proportionate to the potential exposure to the corresponding risks.

The reasonable due diligence process in 2023 did not reveal any known cases of modern-day slavery among our suppliers.

MEASURES TAKEN TO REMEDIATE FORCED LABOUR OR CHILD LABOUR

Based on the mapping of our active suppliers, the identification of our key suppliers and the in-depth analysis to determine whether any of these suppliers present a higher risk of exposure to modern-day slavery, no known incidents or significant risks of modern-day slavery were identified. The issue of remediation is therefore not considered to be applicable.

The management of strategic suppliers is part of the mandate of C-COM's Director of Operations and Customer Service – a 20year veteran of the company.

Moreover, the fact that we make it a point to maintain close relationships with strategic suppliers who share our values with regard to human rights, ethics, health and safety, and the environment allows us to streamline our projects and meet deadlines.

We will nevertheless remain vigilant in this regard and will continue to rely on our procurement process. MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT RESULTS FROM MEASURES TAKEN TO ELIMINATE THE USE OF FORCED LABOUR OR CHILD LABOUR

As indicated in the previous section, we concluded, based on our assessment, that there was no loss of income for vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour within our supply chains.

TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

At C-COM, we take a zero-tolerance stance on modern-day slavery, human trafficking and undeclared, involuntary, forced labour and child labour. Our Code of Ethics reflects our corporate values and the behaviours we expect of our staff and directors in everything they do in the fulfilment of their duties, especially as it pertains to fundamental rights.

Employees are required to acknowledge our Code of Conduct, which is regularly updated to reflect appropriate policies related to regulatory requirements and ethics.

We also regularly review our policies and training content to ensure they continue to be up-to-date, relevant and effective.

In addition, by the end of 2024, our senior management team will have completed an ethics training course which will feature a section on human rights and our zero-tolerance stance on modern-day slavery.



ASSESSMENT OF EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR ARE NOT BEING USED

We have put initiatives in place to determine the effectiveness of the efforts deployed at C-COM to ensure forced labour and child labour are not being used and will continue to improve and refine key performance indicators in this regard.

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 entity or 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.

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Dr. Leslie Klein President and CEO

I have the authority to bind C-COM Inc. and its applicable subsidiaries.

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Art Slaughter CFO

I have the authority to bind C-COM Inc. and its applicable subsidiaries.

