

# This statement is published for the financial year ending 31 December 2023 by Verizon Canada Ltd.

## 1: Opening statement from senior management

The Verizon Communications Inc. (NYSE: VZ) group of companies (“Verizon”) is committed to preventing acts of forced labour and child labour from occurring in connection with its business operations, including its supply chain. This statement describes specific actions taken by Verizon in respect of due diligence in relation to forced labour and child labour, and are inclusive of goods and services utilized or imported by Verizon Canada Ltd. (“Verizon Canada”).

## 2: Structure of the organisation

Verizon Canada provides private and public IP, corporate VoIP, CPE, IoT connectivity, managed network, professional and security services, data center and colocation services, and other related services to enterprise customers. More information about the nature of Verizon Canada business is available at <https://www.verizon.com/business/en-ca/support/>

In order to provide our services, we contract with a broad range of suppliers including telecommunications equipment manufacturers, technology solutions providers, professional services organisations, outsourcing specialists, network engineering vendors and facilities management vendors. Contracting with suppliers and diligence activities with respect to our supply chains are conducted primarily by Verizon’s central supply chain functions.

## 3: Policies

Verizon’s **Credo** defines who we are and how we operate. It states that we are accountable and that we are committed to doing the right thing. As part of our commitment to combating forced labour and child labour, we implement and enforce the following policies:

The Verizon employee **Code of Conduct** (“Employee Code”) defines our ethical business practices. All Verizon employees must complete training on the Employee Code. Our Code of Conduct specifies that we do not tolerate forced labour, slavery, or human trafficking in any form, and that we will not knowingly work with any supplier or contractor who engages in such practices. It further specifies that Verizon does not tolerate child labour and adheres to minimum age laws in all places where we conduct operations. In 2022, the Code of Conduct was amended to specifically call out prohibitions on the use of forced labour or child labour.

Our **Supplier Code of Conduct** (“Supplier Code”) defines the ethical business practices that our suppliers must adhere to. The Supplier Code has been developed by Verizon over many years. It reflects ILO labour standards, including those regarding the elimination of child labour and forced labour. Our Supplier Code is the primary mechanism used by Verizon to ensure suppliers promote ethical conduct in the workplace, safe working conditions and the treatment of workers with respect and dignity. Our Supplier Code also:

- Forbids the use of child labour, forced labour and discrimination.

- Protects employees' rights to freedom of association and collective bargaining, as permitted by local laws.
- Describes how suppliers should work with us on compliance and enforcement issues.

Under the Supplier Code, suppliers are required, and the public is encouraged, to report violations of the standards in our Supplier Code to the Verizon Group's Office of Ethics and Business Conduct through Verizon Ethics at 844.894.8433 (within the U.S.), (+)800.0.624.0007 (outside the U.S.), through email at [ethics@verizon.com](mailto:ethics@verizon.com), or online at [www.verizonethics.com](http://www.verizonethics.com). Such reports may be made anonymously. Under the Supplier Code, suppliers are further bound to prevent any retaliation against whistle-blowers.

It is our general practice to incorporate the Supplier Code into our procurement contracts and purchase orders. Verizon reserves the right to review or audit our suppliers' compliance with the Supplier Code. We also incorporate ongoing compliance into our procurement decisions.

### Human Rights Policy

Verizon's **Human Rights Statement** affirms that Verizon is committed to operating with respect for internationally-recognized human rights, including those affirmed in the Universal Declaration of Human Rights. Guided by the human rights due diligence framework set forth in the UN Guiding Principles on Business and Human Rights, we are committed to assessing the impacts of our business activities on human rights and to addressing adverse impacts. Our efforts include attention to the human rights impacts of our products, services, and strategy and to our engagements with employees, customers, communities, governments, business partners, and suppliers.

We continually engage with external networks and experts to inform our approach. We also maintain communication channels so that stakeholders may raise concerns if they believe we are not operating consistent with our human rights commitments. We deliver regular training and awareness-raising activities to provide Verizon employees with guidance on our human rights commitments and with the tools they need to operate consistent with those commitments.

Our human rights efforts are overseen by the Corporate Governance and Policy Committee of our Board of Directors and operationalized by our Business & Human Rights Program ("BHRP"), a dedicated legal team within Verizon's broader Environmental Social and Governance (ESG) function. The BHRP is primarily for assessing and managing human rights risks across the company, in partnership with teams across the business including Human Resources, Labour & Employment, Product, and Sourcing and Supply Chain. Legal, Public Policy, and Global Supply Chain.

## **4: Due Diligence**

Human rights due diligence with respect to Verizon's operations, products, services, suppliers and business partners are conducted primarily by Verizon's central functions and are inclusive of Verizon Canada. This includes actions taken with respect to assessing and managing the risks of forced labour and child labour, as described in this statement.

As part of our ongoing efforts to monitor and reduce the risk of forced labour and child labour occurring within our supply chains, we have adopted the due diligence procedures described below.

## Identification of Salient Risks and Human Rights Impact Assessments

In 2021 and 2022, Verizon undertook a formal saliency assessment to identify the issues across our value chain that are most salient to Verizon's core business strategy. This assessment was inclusive of Verizon's Verizon Canada. In this assessment, the following issues were identified as most salient to Verizon: privacy; non-discrimination; free expression; and rights in the workplace and supply chain. Noting the company's dependence on equipment manufacturers, the assessment identified forced labour and child labour as potential risks in the company's supply chain. In 2023, Verizon did a refresh of the saliency assessment, which affirmed the prior identification of salient risks.

These saliency assessments inform and help to prioritize the work of the BHRP. In partnership with teams across the company, the BHRP conducts ongoing human rights due diligence, guided by the framework set forth in the UNGPs, to identify, understand, and address the human rights implications of our business decisions, including our technology, products, services, and strategy. This work includes regular engagement with supply chain and sourcing personnel regarding both the types of suppliers in our supply chain and the location(s) in which those suppliers are operating. These reviews include consideration of the risks of both forced labour and child labour.

As part of its work, the BHRP undertakes Human Rights Impact Assessments (HRIAs) to more specifically evaluate and address human rights risks that may intersect with our business. Our assessments cover all aspects of our operations, including our supply chain. In 2020 and 2021, these assessments included a Child Rights Impact Assessment, which included a review of the potential risks of child labour in connection with Verizon's operations.

## Supply Chain Risk Management

Verizon's policies and procedures with regard to managing risks in the supply chain are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of forced labour and child labour occurring in our business and supply chains
- provide adequate protection for whistleblowers.

Since January 2018, Verizon has implemented the Supplier Risk Management Program ("SRMP") to enable Verizon to identify, assess, monitor, and manage the risks associated with suppliers engaged by Verizon throughout the supplier lifecycle. The SRMP establishes principles for identifying, assessing, monitoring, and managing risk associated with supplier products or services by identifying responsible stakeholders, establishing the supplier due diligence requirements and defining the end-to-end supplier risk management lifecycle framework, including ongoing monitoring of supplier activities. Anyone engaging with and/or managing suppliers in Verizon's supply chain is responsible for adhering to minimum supplier risk management requirements regardless of spend and assumes the ultimate responsibility and accountability for the risks related to suppliers and relevant remediation activities.

SRMP is a framework establishing governance, processes, and tools that must be followed across Verizon to continuously manage supplier risk. Continuous assessment and monitoring activities

throughout the supplier risk management lifecycle phases are intended to provide effective oversight and controls. Supplier Risk Management lifecycle phases include: Planning, Due Diligence, Contracting, Ongoing Monitoring, and Termination. The Verizon Supplier Risk Office (“SRO”) oversees, monitors, and governs Verizon’s supplier risk management activities and implements the SRMP. The SRO is responsible for SRMP oversight, coordination, and providing support to stakeholders throughout Verizon to complete SRMP activities and managing the Verizon Supplier Risk Management Tool.

In 2021, the SRO, working with the BHRP, worked to enhance Verizon’s screening efforts with respect to new suppliers in order to be able to prioritise higher-risk industries for due diligence. In 2022, we further updated our screening for suppliers that supply hardware to Verizon in order to assess the capacity of those suppliers, through appropriate policies and standards, to manage the human rights risks in their operations and supply chains.

Verizon Business Risk Team supports this work by regularly carrying out due diligence on new and existing vendors using search criteria inclusive of the risks of forced labour and child labour. The Business Risk Team has been trained in relation to forced labour and child labour risk. Where they identify information that could be a risk factor they raise that to the SRO and Verizon Legal, including the BHRP, for review.

Finally, Verizon also uses the third-party assessment tool, EcoVadis, to evaluate our suppliers’ performance including in relation to labour and human rights. Since 2013, Verizon has assessed 728 key suppliers through this partnership. EcoVadis validates suppliers’ responses to their detailed questionnaire and researches information from other public sources to benchmark suppliers on their performance. When weaknesses are identified, we work with the supplier to create a corrective action plan to improve their current activities. Both Verizon and our suppliers benefit from this partnership.

#### Engagement in Industry Initiatives

To support its work in managing risks associated with its supply chain, Verizon is a member of the Joint Alliance for CSR (JAC), an association of telecommunications operators who share resources to develop and enforce standards and best practices within the ICT supply chain. JAC’s ongoing audit activities cooperatively assess and verify compliance with recognized labor, social and environmental standards, including with respect to forced labor, underage labor, and working hours. Members of JAC fund shared assessments and audits of their common suppliers; audits are conducted by independent auditors. The JAC furthers Verizon’s efforts to capture not only what suppliers are pledging through their policies but also to survey their performance on-site. 1,060 supplier audits have been completed since JAC’s inception in 2010. 150 of these audits were completed in 2023.

In 2021, Verizon joined JAC’s Human Rights workstream, which has focused its efforts on addressing human rights challenges in telecom industry supply chains, including the risks of forced labour and child labour.

## **7: Issue Management**

In general, we respond to suspected or actual violations of our Supplier Code in a flexible manner appropriate for the nature of the violation. While egregious violations can result, and have resulted, in Verizon exiting a supplier relationship, most noncompliance is addressed by investigation and, where appropriate, cooperation with the supplier to establish a corrective action plan to improve their current program.

In 2023, Verizon worked with specific suppliers to assess instances of heightened forced labour risk within their own supply chains and to implement appropriate corrective actions as necessary. Based on these actions, Verizon did not take any measures to remediate loss of income as a result of these steps, as no such adverse impacts of the mitigation efforts were identified.

## **8: Contracting**

When Verizon uses a supplier to obtain products and services, we establish a contract with the supplier incorporating, at a minimum, the Supplier Code. Issues identified as a result of the due diligence are addressed within the contract terms and conditions.

## **9: Training**

We train our procurement employees in recognising the potential human rights risks in our business and supply chains, and to assist in the risk assessment described above. The training also focuses on the procurement team's role in interacting with suppliers to improve our due diligence. The training is currently delivered in live sessions by members of our Legal team. Most of the sourcing personnel at the supervisory level in Verizon have been given such live training.

## **10: Monitoring and Effectiveness**

Verizon is engaged in an ongoing assessment of both the nature and extent of our exposure to the risk of forced labour and child labour and the effectiveness of our efforts to manage this exposure. We continually review areas of our supply chain that may be at higher risk. Members of the SRO, Business Risk Team, Sourcing, Sustainability, and BHRP regularly meet to discuss risk areas and potential process improvements. As noted above, in 2022, we sought to enhance our capacity to assess the readiness of hardware suppliers to manage human rights risks in their operations and supply chains through appropriate policies and standards.

We are also engaged with relevant industry initiatives as part of a commitment to stay abreast of the best practices and to support continuous assessment and improvement of our own efforts.

## **11: Further actions**

Verizon will continue to assess any potential risks associated with forced labour and child labour in connection with its operations and will also assess emerging legal and regulatory trends with regard to human rights due diligence. In this context, we expect to continue to identify opportunities to strengthen our due diligence efforts with respect to forced labour and child labour risks.

## 12: Consultation and Management Approval

This forced labour and child labour statement relates to the financial year ending 31 December 2023 and has been approved for publication by the Board of Directors of Verizon Canada.

## 13: Attestation

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11(4)(b)(ii) thereof, I attest that I have reviewed the information contained in the report for Verizon Canada.

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. This report has been approved by the Board of Directors of Verizon Canada. For clarity, I have provided the attestation above in my capacity as a Director of Verizon Canada and not in my personal capacity.

DocuSigned by:  
  
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Name: Claudia Carvalho Costa

Title: Director, Verizon Canada Limited