



ANNUAL REPORT Bill S-211

This report is made pursuant to Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). The report outlines the approach and initiatives taken by OptConnect Management, LLC (“**OptConnect**”) to identify and address the risks of forced labour and child labour in its business operations and supply chains in the 2024 financial reporting year.

OUR COMMITMENT

OptConnect is committed to preventing and reducing the risk that forced labour or child labour is used in the production of the goods it sells to its customers that are used in Canada and globally.

CATEGORIZATION, SECTOR, AND INDUSTRY

OptConnect is an entity under the Act

The Act applies to OptConnect as, in at least one of its two most recent financial years, the company had:

- (1) at least \$20 million in assets; and
- (2) generated at least \$40 million in revenue.

Our Sector and Industry

OptConnect is a leading provider of connectivity solutions, serving diverse sectors including ATMs, vending machines, smart safes, digital signage, security assets and irrigation systems. With the strategic acquisition of Premier Wireless Solutions (“**PWS**”) in 2021, and the recent addition of M2MDataGlobal and Capestone in 2024, OptConnect has solidified its global presence and commitment to delivering cutting-edge wireless connectivity solutions. The Act does not apply to PWS, M2MDataGlobal and Capestone, as each of the subsidiaries do not individually meet the criteria for a reporting entity.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Our Structure and Activities

OptConnect is a partnership headquartered in Utah. The company’s primary activity is the sale of its connectivity solutions products to clients based in the United States, some of which have



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customers/locations in Canada. While some customers based in the United States request that OptConnect import the company's goods directly into Canada, this is limited to very minor dealings. With respect to PWS, the company is also headquartered in Utah and is a value-added distributor and solutions provider. PWS sells a full spectrum of RF technology products, systems integration services, test and certification services, and wireless data plans to customers based in the United States and elsewhere. M2MDataGlobal was acquired by OptConnect on February 6, 2024 and is focused on LATAM IoT solutions. They continue to have their office in Santiago, Chile serve as their main headquarters and operate under their same name. Capestone predominantly operates in Europe and was acquired by OptConnect October 2, 2024, so OptConnect has not as of yet had an entire financial year with Capestone fully integrated into our operations and activities.

Our Supply Chain

OptConnect has relatively few suppliers outside of North America. Some goods, such as antennas and power supplies, are imported from continental Europe and Asia, respectively. With respect to the manufacturing of the devices that are sold by OptConnect, this is primarily done in Asia and then imported into the United States for activation and deployment. OptConnect relies on the services of third-party freight forwarders to help coordinate the company's imports of various parts and devices.

Steps Taken by OptConnect in Prior Financial Year

OptConnect has developed and implemented anti-forced labour and child labour contractual clauses into the company's supply agreements, as well as the terms and conditions of OptConnect's purchase order agreements. Under these clauses, the supplier must represent and warrant that it is acting in compliance with all applicable foreign, federal, state, and local laws. The supplier must also warrant and represent that neither it, nor any of its subcontractors, will use child, slave, prisoner, or any other form of forced or involuntary labour, or engage in abusive employment or corrupt business practices in the supply of products to OptConnect and PWS.

OptConnect has also created a policy surrounding Child and Forced labor and required Child and Forced Labor training for all employees and required all employees to completed this prior to the end of its fiscal year 2024. As of November 8, 2024, we also have a new template for Supplier Code of Conduct, a Supplier Due Diligence Questionnaire that we plan to use as part of our onboarding of new vendor relationships.

POLICIES AND DUE DILIGENCE PROCESSES

OptConnect has due diligence processes in relation to forced and/or child labour, including embedding responsible business conduct into policies and management systems. These policies and processes apply to OptConnect, PWS, M2MDataGlobal, and Capestone.



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In its previous financial year, the policies and processes that OptConnect maintained to help manage potential forced labour and child labour risks within the business and its supply chain include:

1. An Associate Handbook, which includes an Ethics Code that requires OptConnect employees to adhere to the highest standards of business and personal integrity as a representative of the business.
2. A Supply Agreement, which requires the supplier to represent and warrant that it will conduct its business operations with respect to the manufacture of the products in accordance with the applicable laws. In addition, neither the supplier, nor any of its subcontractors, will use child, slave, prisoner, or any other form of forced or involuntary labour, or engage in abusive employment or corrupt business practices, in the supply of products under the Supply Agreement.
3. The terms and conditions of OptConnect's Purchase Order Agreement, which requires that the supplier of the products warrant and represent that it is acting in compliance with all applicable foreign, federal, state, and local laws. The supplier must also warrant and represent that neither it, nor any of its subcontractors, will use forced labour or child labour in the supply of products to OptConnect.
4. OptConnect Child and Forced Labor Training and Policy formal acknowledgment is required for all employees and OptConnect shall continue this requirement for employees for the foreseeable future.

FORCED LABOUR AND CHILD LABOUR RISKS

OptConnect has not yet started the process of working to identify specific risks of forced labour and child labour that may exist in its activities and supply chains. The company is aware that there may be higher risks associated with certain regions, goods, and industries and intends to engage with the risk identification process in subsequent reporting years.

REMEDATION MEASURES

OptConnect has not identified any forced labour or child labour in its activities or supply chains. As such, the company has not undertaken any remediation measures.

REMEDATION OF LOSS OF INCOME

OptConnect has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, the company has not undertaken any income remediation measures.



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TRAINING PROVIDED TO EMPLOYEES

OptConnect provides regular employee training, including with respect to safe and legally compliant workplace practices and policies. Going forward, the company will assess what training specific to forced and child labour may be appropriate for its workforce.

ASSESSING EFFECTIVENESS

OptConnect does not currently have specific policies and procedures in place to assess its effectiveness in reducing or eliminating the risk of child labour or forced labour in its activities and supply chains. The company will be considering what methods of assessment may be appropriate for subsequent reporting years.

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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of OptConnect Management LLC have executed this report as of the effective date of the signatures set out below.

SIGNED

3/24/2025 | 14:43 PM PDT

Date

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Signed by:

CHRISTIE KENT

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Name: Christie Kent

Title: Chief Financial Officer

I have authority to bind OptConnect Management LLC



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