

Rogers' Report on Fighting Against Forced Labour and Child Labour

About Rogers

Ted Rogers founded our company 65 years ago with one small loan and one big dream. He believed in the power of communication to inform, to inspire, and to innovate. Driven to honour his father's legacy, he purchased his very first radio station, CHFI, at the age of 27. From these humble beginnings, we've grown into Canada's communications and entertainment company – because the relentless drive of one turned into the relentless drive of many. Each and every day, we're driven to enhance and enrich the lives of Canadians.

As Canada's leading communications and entertainment company, we are proud to connect and entertain millions of Canadians with our world-class products, networks and content. We are a strong national company investing in Canada and are committed to embedding sustainable practices in how we do business.

We are committed to developing innovative products and services that meet the needs of Canadians while generating positive impacts in our communities. With respect to procurement and supplier management, we emphasize the importance of adhering to international human rights standards as reflected in documents such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Declaration on the Rights of Indigenous Peoples, the UN Global Compact, and Canadian human rights laws. We currently use the UN Guiding Principles on Business and Human Rights as a framework for managing and mitigating human rights risks in our supply chain. In doing so, we identify geographies, materials, and potential suppliers at risk, and implement strategies to leverage and remedy these risks.

About this Report

This is the second annual report (Report), under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act), of Rogers Communications Inc. (RCI) and the following RCI subsidiaries (Subsidiaries), each of which is a reporting entity under the Act:

Rogers Communications Canada Inc.

Shaw Cablesystems Inc.

Rogers Media Inc.

Rogers Transit Services Inc.

Fido Solutions Inc.

This Report has been prepared and presented to the Minister of Public Safety and Emergency Preparedness pursuant to the requirements set out in the Act. The scope of this Report relates to the operations and supply chain of RCI and the Subsidiaries, which collectively are referred to in this Report as “we”, “us”, “our”, “Rogers”, “Rogers Communications”, and “the Company”.

This Report describes the steps the Company took during the financial year ended December 31, 2024, to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods in Canada or elsewhere by the Company or of goods imported into Canada by the Company, and includes other information required by the Act.

This Report has been reviewed by management and approved by the RCI Board of Directors (RCI Board).

Understanding our business structure and activities

RCI's shares are publicly traded on the Toronto Stock Exchange (TSX: RCI.A and RCI.B) and on the New York Stock Exchange (NYSE: RCI). RCI controls, directly or indirectly, the Subsidiaries. We report our results of operations in three reportable segments - Wireless, Cable, and Media. A full description of our business can be found in our 2024 Annual Report, at <https://about.rogers.com/investor-relations/>.

Wireless

We were the largest provider of wireless communication services in Canada as at December 31, 2024. We are a Canadian leader in delivering a range of innovative wireless network technologies and services, and provide consumers and businesses with the latest wireless devices, services, and applications.

Cable

We are one of the largest cable service providers in Canada, providing an innovative and leading selection of high-speed broadband Internet access, Internet protocol-based (IP) television, satellite, applications, online viewing, phone, home monitoring, and advanced home WiFi services to consumers and businesses across Canada.

Media

We provide services in sports media and entertainment, television and radio broadcasting, multi-platform shopping experiences, and digital media. In Sports Media and Entertainment, we own the Toronto Blue Jays, Canada's only Major League Baseball team, and the Rogers Centre event venue, which hosts the Toronto Blue Jays home games, concerts, trade shows, and special events.

Our goods supply chain

We have supplier arrangements with third parties to provide various goods to our business operations and customers. These include, but are not limited to, network equipment, wireless devices, customer-premises equipment, and consumer goods.

Steps taken in last financial year to reduce the risk

During the financial year ended December 31, 2024, the Company took the following steps to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods in Canada or elsewhere by the Company or of goods imported into Canada by the Company:

- We enhanced our 30-minute web-based training, "Your Role When Working With Suppliers," which is available for all employees, including approximately 1,600 employees in supply chain procurement and other roles that frequently engage with suppliers or with supplier relationships. The updated training deepens their understanding of the Act, modern slavery risks, and employee responsibilities.
- We also conducted more in-depth training for Rogers' Procurement and Supply Chain (PSC) group and key members of corporate groups who support them through a live one-hour seminar and interactive question and answer session. This session provided detailed information on the purpose and requirements of the Act, how to identify and mitigate risk, and how to manage relationships with suppliers where risk exists. Approximately 350 key PSC employees and corporate services employees that support the PSC group, at levels ranging from Analyst to Vice President, received this training.
- Externally, the PSC team conducted direct outreach sessions with 20 top suppliers, as well as Rogers employees outside of the PSC team who work closely with them. These one-hour dialogue-based sessions were designed to ensure those suppliers are aware of, understand and are focused on provisioning to the Company in compliance with the Act. The content of the sessions emphasized the Act's requirements, as well as Rogers' policy and contractual requirements (including with respect to supplier reporting and risk mitigation). These sessions have helped enhance suppliers' awareness of their obligations and potential risk associated with the use of forced labour and child labour in their supply chains, and they enable meaningful risk mitigation dialogues.
- We strengthened our Ethical Procurement Practices (EPP) survey to include an expanded question set with respect to modern slavery issues and adjusted the formula for evaluating supplier responses to ascribe a higher weight to responses to those questions. We now require suppliers to report annually to us on their own compliance, as well as that of their supply chain. The survey is distributed annually to our top-tier suppliers, who represent approximately 97% of our procurement-managed spend. The changes to the EPP in 2024 improve the Company's ability to identify risk of forced labour and child labour in our supply chain and to mitigate that risk.

Rogers' policies and due diligence

Rogers does not tolerate forced labour or child labour internally or in its supply chain.

The Rogers Business Conduct Policy and Rogers' Supplier Code of Conduct, together with our EPP survey, contract management and monitoring system, anonymous reporting hotline (the Rogers STAR Hotline), and direct outreach sessions with key suppliers comprise our current policies and due diligence processes in relation to forced labour and child labour.

Rogers Business Conduct Policy

The use of forced labour and child labour is inconsistent with the central principles of the Rogers Business Conduct Policy. This policy applies to all Rogers employees and RCI Board members and can be viewed at: <https://about.rogers.com/investor-relations/corporate-governance/>.

The Rogers Business Conduct Policy requires individuals to comply with all laws and regulations, and to escalate any questions regarding legality, culminating in consultation with the Vice President/Director, Human Resources and the Legal Department, as required. In addition, this policy directs individuals to refrain from conducting business with suppliers and/or contractors who engage in unlawful or unethical business practices or behaviour.

The Rogers Business Conduct Policy also emphasizes that Rogers does not seek competitive advantages through illegal or unethical business practices or behaviour. With respect to suppliers, this policy is clear that they are to be selected based on merit and are expected to adhere to Rogers' Supplier Code of Conduct which, as described below, proscribes the use of forced and child labour.

Rogers' Supplier Code of Conduct

We use the UN Guiding Principles for Business and Human Rights to mitigate and manage potential human rights issues throughout our supply chain, including identification of geographies, materials, and suppliers that may carry risk.

Rogers' Supplier Code of Conduct sets out Rogers' requirements for third-party suppliers, and by extension their subcontractors, as they relate to ethical conduct, anti-bribery practices, labour practices, protection of human rights, and environmental, health, and safety management. This expressly includes not employing forced labour or child labour, complying with applicable wage laws, and respecting local workweek regulations. The Supplier Code of Conduct also requires suppliers to have a management system to ensure conformity with the code and other requirements, and to identify and mitigate risks related to the code and, specifically, labour practices. The code is available at https://supplierportal.rogers.com/Code_of_Conduct.html.

Rogers' Supplier Code of Conduct is communicated to suppliers on our supplier portal and is integrated into contractual requirements for suppliers. Suppliers are generally expected to adhere to Rogers' Supplier Code of Conduct, failing which Rogers may implement a corrective action plan or terminate the supplier's contract.

EPP Survey

To ensure suppliers adhere to our Supplier Code of Conduct and align with our corporate standards and requirements, our PSC group conducts an annual EPP survey. Major suppliers, who together receive the vast majority of the Company's corporate procurement spending, are asked to confirm they have human rights policies that prohibit the use of forced labour and child labour and to describe: the parts of their business and supply chains that carry a risk of forced labour or child labour; how they assess and manage that risk; any remediation measures resulting from any measures to eliminate the use of forced labour or child labour; and any specific training provided to employees concerning forced labour and child labour. Where a supplier's EPP responses reveal potential risk or a matter requiring redress, we work with the supplier to mitigate the risk or prepare a corrective action plan to address gaps, as applicable.

Supplier contract management and monitoring

We require suppliers to address compliance with applicable laws and regulations and their alignment with the values set out in Rogers' Supplier Code of Conduct. Our automated contract management system and continuous monitoring supports our awareness of, and ability to respond to, identified failures by suppliers to comply with applicable laws or to fulfill the requirements of the Supplier Code of Conduct. Our supplier outreach sessions provide additional insight into supplier practices and the opportunity to ensure alignment based on a collaborative approach to risk management and mitigation.

Rogers STAR Hotline

To ensure Rogers delivers on its commitment to honesty, integrity, and good corporate citizenship, and to enhance compliance with the Rogers Business Conduct Policy and Rogers' Supplier Code of Conduct, we expect all employees, suppliers, and other partners to be alert and proactive in reporting misconduct, including misconduct with respect to unethical and illegal behaviour, such as forced labour and child labour.

In addition, Rogers' Supplier Code of Conduct requires suppliers (including their personnel and subcontractors) to report any instances of violations of the code, including the use of forced labour or child labour.

Rogers STAR Hotline (www.rogersstarhotline.com) provides a tool for making secure and anonymous submissions to the Company with respect to alleged misconduct, including unethical sales or purchasing practices on the part of a supplier. Rogers retains any submissions it receives in confidence, investigates all information provided, and takes enforcement actions, as appropriate, pursuant to both the Rogers Business Conduct Policy and Rogers' Supplier Code of Conduct. The confidential format is designed to help mitigate any reluctance that a supplier employee or subcontractor may have in making a report.

Supply chain assessment and management

We strive to conduct business with socially responsible entities that share our values. Identifying and managing risks in our supply chain, including the risk that forced labour or child labour is used in any step of our supply chain, is an integral part of our conscientious approach to managing social impacts.

The businesses of RCI and the Subsidiaries all operate in Canada, which, according to the Global Slavery Index¹, has a low prevalence of forced labour and child labour. Moreover, the Company complies with federal and provincial labour laws and employment standards. In addition, the majority of the goods used in our business are sourced from suppliers located in Canada and the United States and are subject to labour laws and employment standards similar to those applicable to Rogers.

Part of our procurement comprises network equipment, customer premise equipment, and mobile devices that are manufactured or assembled in countries including China, Vietnam, and South Korea. There is risk of the use of forced labour or child labour in connection with the production of these goods, given that laws, regulations, and practices to protect workers in such countries may not be as extensive as those applicable to businesses operating in Canada. However, the vast majority of such equipment is supplied to Rogers by large global vendors that have policies that address forced labour and child labour, and the vast majority of which have dedicated Modern Slavery statements and are also members of the Responsible Business Alliance, demonstrating their commitment to reducing the risk of forced labour and child labour in their supply chains.

In addition, a small amount of other consumer goods are imported by the Company from suppliers located in China, India, Russia, UAE, Vietnam and other countries whose worker protection laws, regulations and practices to protect workers may not be as extensive as Canada's. While there is a risk of forced labour and child labour in the production of such goods, it is mitigated by the fact that such suppliers are generally subject to Rogers' Supplier Code of Conduct as part of Rogers' contracting process.

We review our supply chain, EPP feedback, information gathered at supplier outreach sessions, and alerts and reports generated by our supplier monitoring capability on an ongoing basis to identify parts of our business and supply chain that carry a risk of forced labour or child labour.

Remediation

In our most recent financial year, we did not identify, nor were we aware of, the use of any forced labour or child labour in our business and supply chain. Accordingly, we did not take any measures to remediate such labour or to remediate the loss of income to the most vulnerable families that would be affected by any such measure.

¹ Walk Free Global Slavery Index, <https://www.walkfree.org/global-slavery-index/>

Training

Rogers has approximately 24,000 employees. All new Rogers employees complete a mandatory onboarding program, which includes review and required attestation of the Rogers Business Conduct Policy. In addition, all continuing Rogers employees are required to complete annual, 30-minute web-based training on the Rogers Business Conduct Policy. This training includes knowledge assessment and requires attestation on completion. Through this onboarding and ongoing training, employees are expected to be familiar with and adhere to the principles and procedures set out in the policy. This training undergoes annual review and enhancements to ensure it is comprehensive and addresses a broad spectrum of issues. Failure to adhere to the policy may result in discipline, up to and including termination of employment and/or legal action.

Employees with corporate procurement responsibilities also receive mandatory, annual training concerning purchasing policies, regulatory requirements, and ethical business practices, including responsibilities in connection with risks related to forced labour and child labour in the Company's supply chain. This includes web-based training for approximately 1,600 employees with procurement and supply chain responsibilities ("Your Role When Working With Suppliers") at a wide range of levels within the Company, from Analyst to Vice President. This web-based training contains an evaluated module on forced labour and child labour in supply chains.

Additional training includes periodic, in-depth workshops for key PSC employees and corporate employees who support them. While these do not currently include a formal evaluation, their efficacy is ensured by their in-person format and the open dialogue and question and answer exchanges the format enables. Our training is regularly updated.

Assessing effectiveness

This Report describes a number of measures Rogers has in place to prevent and reduce the risk that forced labour or child labour is used in our business and supply chain. Our PSC group regularly assesses the effectiveness of our practices in view of the requirements of the Act.

The following RCI Board committees oversee our program to identify and respond to risks, including risks of forced labour in our business and supply chain.

The Corporate Governance Committee develops, reviews and, where appropriate, recommends to the Board a set of corporate governance principles, including a code of conduct and ethics, aimed at fostering a healthy governance culture. In addition, it assesses the effectiveness of the Board as a whole, the committees of the Board and any leadership positions of the Board.

The Audit and Risk Committee reviews the annual strategic risk assessment, including management's implementation of risk policies and actions to monitor and control major risk exposures.

The ESG Committee assists the Board in fulfilling its oversight responsibilities of relevant environmental sustainability, social responsibility, and governance policies, strategies, and programs and the actions we can take to be a responsible corporate citizen. Our CEO is responsible for sustainability and social impact from a management perspective and is supported by the Chief Corporate Affairs Officer and an Environmental, Social and Governance (ESG) Operating Group composed of senior leaders from across the organization to drive accountability around advancing efforts.

Approval and attestation

This Report was approved by the Board of Directors of Rogers Communications Inc. as a joint report of Rogers Communications Inc. and the Subsidiaries for the financial year ended December 31, 2024, in accordance with subparagraph 11(4)(b)(ii) of the Act.

I have the authority to bind Rogers Communications Inc.



Robert Gemmell

Lead Director,
Chair of the Audit and Risk Committee, and
Chair of the Corporate Governance Committee of
Rogers Communications Inc.

Date: April 29, 2025



Tony Staffieri

Director, President & CEO of
Rogers Communications Inc.

Date: April 29, 2025