

Rogers' Report on Fighting Against Forced Labour and Child Labour

About Rogers

Our founder, Ted Rogers, started Rogers with one small loan and one big dream. He purchased his very first radio station at the age of 27 and grew Rogers into a world-class media and communications company. Ted's legacy to bring all Canadians the very best products, services, and experiences lives on today in each of our team members. Across Canada, our diverse and highly skilled teams work to deliver reliable and easy-to-use services that connect and entertain millions of Canadians.

Rogers is one of Canada's leading wireless, cable and media companies and provides connectivity and entertainment to Canadian consumers and businesses across the country. We work to identify and mitigate risk of social impacts within our business operations and practices, guided by our commitment to international standards and obligations under Canadian law. We share the values of, and commit to, respecting and protecting human rights as reflected in international proclamations on human rights, such as the Universal Declaration of Human Rights, the United Nations (UN) Guiding Principles for Business and Human Rights, the UN Declaration on the Rights of Indigenous Peoples, the UN Global Compact, and Canadian human rights laws.

About this Report

This is the initial 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 G.P.¹

Shaw Telecom G.P.¹

Shaw Satellite G.P.¹

Rogers Media Inc.

Rogers Bank

Rogers Blue Jays Baseball Partnership

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, 2023 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).

¹ On January 31, 2024, Shaw Cablesystems G.P. and Shaw Telecom G.P. were dissolved into Rogers Communications Canada Inc., and Shaw Satellite G.P. was dissolved into Shaw Satellite Services Inc.

Understanding our business structure and activities

RCI is 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 primary reportable segments - Wireless, Cable and Media. In addition, we offer certain financial services, as described below. Further information on our business can be found in our 2023 Annual Report, at <https://investors.rogers.com/2023-annual-report/>.

Wireless

We were the largest provider of wireless communication services in Canada as at December 31, 2023. 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, smart home monitoring, and advanced 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.

Other

Through Rogers Bank, we offer both the Rogers Mastercard and the Rogers Red World Elite Mastercard, which allow customers to earn cashback rewards points on credit card spending.

Our goods supply chain

Our supply chain relies on 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, 2023, 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 Rogers' Supplier Code of Conduct to expressly prohibit the use of forced labour or child labour, and to require reporting of instances of non-compliance with these provisions using our anonymous reporting hotline at www.rogersstarhotline.com.
- We strengthened our annual Ethical Procurement Practices (EPP) survey, asking suppliers to confirm not only that they have a human rights policy that prohibits forced labour and child labour (as required by the survey since 2014), but also to outline specifically: 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.

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, and anonymous reporting hotline (the Rogers STAR Hotline), comprise our current policies and due diligence processes in relation to forced labour and child labour.

The 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 is available at <https://investors.rogers.com/corporate.governance/governance.materials/>.

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.

All employees are required to acknowledge the Rogers Business Conduct Policy as a condition of employment at the time of hiring, transfer, or promotion, and to review and acknowledge their acceptance of the policy annually. Failure to adhere to the policy may result in discipline, up to and including termination of employment and/or legal action.

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. They expressly include 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 conformance 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 that suppliers adhere to our Supplier Code of Conduct and align with our corporate standards and requirements, our corporate procurement 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 that 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 a matter requiring redress, we work with the supplier to prepare a corrective action plan to address gaps.

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 support 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.

The Rogers STAR Hotline

To ensure that 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.

The 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 that 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 Index², 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 goods are imported by the Company from suppliers located in China, India, Vietnam and other countries whose worker protection laws and regulations are not 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, 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.

² Walk Free Global Slavery Index, <https://www.walkfree.org/global-slavery-index/>

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. 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.

Training

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 training on the Rogers Business Conduct Policy. 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.

Employees with corporate procurement responsibilities also receive mandatory, annual training concerning purchasing policies, regulatory requirements, and ethical business practices. This training is regularly updated. In addition, these employees participate in workshops on a range of issues, including forced labour and child labour and the related risks. Employees outside of our corporate procurement group also receive targeted training on compliance with purchasing policies and practices.

Assessing effectiveness

This Report describes a number of measures that Rogers has in place to prevent and reduce the risk that forced labour or child labour is used in our business and supply chains. Our procurement 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 or child labour in our supply chains.

The Corporate Governance Committee develops and 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.

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 oversees the Company's environmental sustainability and social responsibility policies, strategies and programs, including reviewing trends and emerging issues in the ESG field, and risks and opportunities that may affect the Company's business strategy and performance. This also includes review of actions the Company can take to be a responsible corporate citizen and the communication of the Company's culture and values.

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, 2023, in accordance with subparagraph 11(4)(b)(ii) of the Act.

I have the authority to bind Rogers Communications Inc.

"Robert Gemmell"

Robert Gemmell

Lead Director,
Chair of the Audit and Risk Committee, and
Chair of the Corporate Governance Committee of
Rogers Communications Inc.
Date: May 16, 2024

"Tony Staffieri"

Tony Staffieri

Director, President & CEO of
Rogers Communications Inc.
Date: May 16, 2024