# 2024 Annual Report

Under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

This joint report has been prepared in accordance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act) on behalf of the Information Services Corporation (ISC) and its subsidiary, ESC Corporate Services Ltd. (ESC), each of which are entities required to file a report under the Act. It sets out the steps taken by ISC and ESC (collectively, "ISC", "we", "our" or "us") during the financial year ending December 31, 2024, to prevent forced labour and child labour in our business operations and supply chains.

#### **About Us**

ISC is a leading provider of registry and information management services for public data and records. We deliver value to our clients by providing solutions to manage, secure and administer information. We are the partner of choice for governments and private sector organizations seeking solutions across the information management spectrum. Our operating philosophy is characterized by a focus on people: the families, entrepreneurs, and professionals who depend on us as an entrusted manager and administrator of valuable information. This approach has fostered a rich, customer service-driven culture, an industry-leading service offering, and has positioned ISC as a significant contributor to the communities we serve.

# **Our Commitment to Human Rights**

We are committed to protecting and promoting human rights. We uphold human rights by promoting a fair, diverse and inclusive work environment, and by acting with honesty, integrity and respect in accordance with our Code of Conduct. We do not tolerate forced labour or child labour or any other violations of fundamental human rights in our business or supply chain and continue to monitor and mitigate these risks.

#### **Our Structure and Operations**

ISC is a corporation under *The Business Corporations Act, 2021* of Saskatchewan. Its shares are publicly traded on the Toronto Stock Exchange under the symbol ISC. It has three main business segments: Registry Operations, Services, and Technology Solutions. Each segment is operated by ISC and/or its wholly-owned subsidiaries, including ESC which is a corporation under Ontario's *Business Corporations Act*. ISC has operations in Canada, Ireland and Luxembourg. ISC, together with its subsidiaries, has a total of 564 employees, including 505 employees in Canada and 59 employees outside Canada, as of December 31, 2024.

All of our operations are supported by common functional groups: Finance, Technology Solutions, Corporate Development & Business Strategy, Corporate Affairs, and People & Culture.

Our **Registry Operations** segment provides registry and information services and software solutions to governments and private sector organizations. We work with our clients to support their policies and execute procedures to ensure the integrity of the data, and manage the information technology, data management and authentication processes. Under this segment, ISC provides registry and information services on behalf of the Province of Saskatchewan, the Province of Ontario, and the Bank of Canada, as well as under the Luxembourg Protocol to the Convention on International Interests in Mobile Equipment on Matters specific to Railway Rolling Stock.

Our **Services** segment delivers solutions uniting public record data, customer authentication, corporate services and collateral management to support registration, due diligence, and lending practices of clients with business across Canada. These services are provided by ESC and its subsidiaries.

Our **Technology Solutions** segment provides the development, delivery and support of registry and related technology solutions.

# **Supply Chain**

We purchase goods and services from suppliers in a range of areas including, for example, information technology, marketing and advertising, consulting services and office equipment.

Since ISC's product offerings are mostly software systems and services to support registry services and solutions for our government and private clients, ISC is the primary end user of the goods and products procured through its supply chain. We neither import goods, nor manufacture, produce or process goods for sale.

ISC's resale and distribution of goods is limited. We act as an agent for a third-party supplier who sources and delivers corporate supplies such as minute books, share certificates, corporate seals and other similar products. We offer these items for sale to customers for whom we provide corporate filing and registration services. We also purchase goods as promotional items such mugs, pens and t-shirts.

Most of the suppliers we purchase goods and services from are based in Canada. Our offices in Ireland and Luxembourg rely on local suppliers for the provision of goods and services such as office supplies, electricity, leases and telecommunications.

### Modern Slavery Risks in Our Operations and Supply Chain

The overall risk that our operations may cause or contribute to child labour or forced labour with respect to our workforce and supply chain is low given our operations primarily involve services carried out by skilled and experienced employees and third-party contractors in Canada and the EU.

#### **Workforce Risk**

For our employees, we have comprehensive human resources policies and procedures that support our commitment to the protection and promotion of human rights. For our contractors, we require them to comply with all relevant laws, including those related to human rights. Because of the nature of our operations and our comprehensive approach to human resources management, there is a negligible risk that our employees or those employed by our contractors might be under legal working age.

#### **Supply Chain Risk**

There is a low risk that the suppliers from whom we purchase goods, equipment and supplies to support our operations might have child labour or force labour in their supply chains. Our suppliers are based in either Canada or the EU and therefore are required to comply with Canadian and EU laws and standards related to human rights, child labour, and forced labour. We also have policies and processes in place to manage these risks. We vet and evaluate potential suppliers during the procurement process, require them to comply with all laws, and then continue to evaluate their performance based on our corporate values.

Our Canadian corporate supplies business is the only area where ISC resells goods procured by a third-party supplier. This supplier confirmed for us that it has done its due diligence to ensure that its supply chain is free of vendors who use forced labour or child labour in their operations.

# Key Policies and Due Diligence For Identifying and Addressing Modern Slavery Risks

As part of ISC's due diligence practices, we review and assess our workplaces and operations, including our supply chain activities, for any impact on human rights. We expect our employees, customers, suppliers and others with whom we conduct business to share our commitment to respecting human rights. The following policies and procedures support our efforts to prevent child labour and forced labour in our operations and supply chain:

**Code of Conduct:** Our Code of Conduct establishes standards for how our employees and contractors are expected to behave and treat fellow employees, clients and communities, including acting with honesty,

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integrity and respect, and promoting our commitment to legal and social responsibility. It requires employees and contractors to comply with all applicable laws and regulations, and to ensure that their actions have no unfavourable effects on society. It provides processes for individuals to raise concerns, including anonymous reporting, and protects individuals from retaliation who, in good faith, report potential violations of the Code.

**Procurement Policy and Procedures:** Our procurement policy and procedures include due diligence processes for selecting suppliers, including evaluating their corporate history, qualifications, reputation and performance.

**Vendor Management Policy and Procedures:** Our vendor management policy and procedures state that vendor contracts for the purchase of goods include compliance with our policies including the Code of Conduct and provide for risk evaluations and monitoring of vendor performance, including vendors' responsibility to assist with policy and contract compliance matters such as a vendor's third-party providers. This gives us access to information about our vendors' supply chains.

Through these supplier management policies and practices, we are able to identify and respond to the risk of child labour and forced labour in our supply chain through the review of potential suppliers' corporate history and reputation, by requiring our suppliers to comply with the legal and social responsibility expectations in our Code of Conduct, and by providing for us to conduct risk evaluations and monitoring of our suppliers' and their third-party suppliers' supply chains.

#### Oversight

The Governance and Nominating Committee of ISC's Board of Directors has oversight over ISC's corporate governance practices, guidelines and related policies, and matters related to integrity and ethics. The Committee reviews and recommends to the Board for approval policies addressing corporate and individual integrity and ethical standards, including our Code of Conduct, and monitors compliance, including reviewing and reporting annually to the Board the findings of investigations of significant or material breaches of the Code of Conduct.

### **Remediation measures**

Because the risk of forced labour or child labour being used in our operations and supply chain is low and, to date, we have not identified any instance or case of the use of child labour or forced labour, we have not needed to take remediation measures to counteract or otherwise make good any related adverse impacts.

# **Training and Awareness**

When hired and annually thereafter, ISC employees must demonstrate their understanding of our approach to human rights, ethics and other risks, by taking mandatory training on topics such as bullying, harassment, abuse and discrimination, acting with integrity, anti-bribery and anti-corruption, confidential information, conflicts of Interest, financial integrity, insider trading, and how to report suspected violations.

## **Assessing Our Effectiveness**

Responsibility for ensuring forced labour and child labour is not being used in our operations and supply chain belongs to all our employees and contractors across all our business segments in all our locations in Canada and abroad. The effectiveness of our Code of Conduct and other policies and processes is regularly evaluated to confirm they remain current and aligned with our business activities, regulatory developments, industry standards and best practices. Adherence to our policies is mandatory, and comprehension is confirmed through annual attestations by all employees.

#### **Attestation**

May 20, 2025

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and in particular section 11 thereof, I attest that: (a) I have reviewed the information contained in the report for the entity or entities listed above; and (b) the report was approved pursuant to subparagraph (4)(b)(ii) of the Act. 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. I am providing this attestation in my capacity as director of Information Services Corporation and not in my personal capacity.

Dion Tchorzewski, Board Member, Information Services Corporation

I have the authority to bind Information Services Corporation.