InComm Canada Prepaid, Inc.

Fighting Against Forced Labour and Child Labour in Supply Chains Report (2025)

INTRODUCTION

InComm Canada Prepaid, Inc. (the "**Reporting Entity**") has prepared this report (the "**Report**") pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the financial year beginning March 1, 2025 and ended February 28, 2026 (the "**Reporting Period**"). All references in this Report to the "**Company**", "**InComm**", "**we**", "**us**", or "**our**" refer to the Reporting Entity unless otherwise indicated. This Report has not been externally assured.

STEPS TO PREVENT AND REDUCE THE RISKS OF FORCED LABOUR AND CHILD LABOUR IN 2025

Modern slavery is a violation of fundamental human rights. It can manifest in several forms, such as slavery, servitude, debt bondage, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

InComm is opposed to all forms of modern slavery, and we are committed to running our business responsibly and we applaud the international legislative effort to combat modern slavery and human trafficking. We conduct our affairs in an ethical way. Through our actions across the organization, we demonstrate our commitment to acting with integrity, fairness and accountability: principles that are fundamental to fostering an inclusive society and a successful business. We work closely with our suppliers and partners, and we expect the same ethical commitment from them.

In general terms, InComm took the following steps during the Reporting Period to prevent and reduce the risk of forced labour and child labour in our business and supply chains:

- engaged the services of local external counsel to assess the legislative framework and advise InComm on interpretation and application and reviewed existing frameworks for management of modern slavery risks;
- conducted a review and gap analysis of the current InComm policies, guidelines and procedures as they relate to risks and responsibilities associated with forced labour and child labour in our activities and supply chains;
- developed mandatory training in multiple languages for all employees on forced labour and child labour risks;
- reviewed our written supplier agreements to maintain compliance with law and contractually required our suppliers to ensure their compliance with law as well as our standards and policies, before engaging in a commercial relationship with them; and
- continued to conduct, monitor and implement due diligence policies and processes of our potential and ongoing suppliers, while prioritizing and focusing due diligence efforts on highest risk areas.

Further details of the above actions are set out in this Report.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Structure, Activities and Operations

InComm Canada Prepaid, Inc. is incorporated under the *British Columbia Business Corporations Act* and has extra-provincial registrations in the following eight (8) provinces: Alberta, Manitoba, New Brunswick, Nova Scotia, Ontario, Prince Edward Island, Quebec and Saskatchewan. The Company is headquartered in Mississauga, Ontario, and currently employs eighty-eight (88) employees, all of whom are located in Canada.

InComm is a technology company that transforms the shopping experience through innovative prepaid products and payments technologies, including digital platforms that allow brands and distributors to sell, promote and deliver prepaid products both digitally and physically, including point-of-sale payment technologies, third party gift cards, multi-choice products, product control technologies, bill payment solutions, wireless payment technologies, online payment processing strategies and prepaid cards for tolling and transit payment solutions, among others.

Although much of the products and/or services that we create and provide are intangible, our activities and operations do involve certain tangible goods and the physical production or printing of cards and related packaging and displays.

Our Supply Chains

We assess and manage the risk of modern slavery and human trafficking occurring in our business and supply chains on an ongoing basis. We choose our suppliers with care through a number of evaluations, including based on their reputation and integrity. Given the nature of our business, we have a fairly small supply chain with supply partners we have built a strong relationship with over a number of years.

We take a risk-based approach to supply chain management, with our strongest focus on overseas Tier 1 suppliers located in jurisdictions in which a higher prevalence and risk of human rights violations has been identified. We make a conscious effort to procure goods and services from local organizations and source the vast majority of our tangible goods locally in North America from Canadian or U.S. suppliers, but we do have certain, minimal tangible goods sourced from vendors located in China, as further described below.

The key tangible goods procured by InComm during the Reporting Period include:

Category	Description (including associated risks)
Physical Cards; Printing	InComm procures services for physical cards and card printing from suppliers predominately located in Canada and/or the United States of America and pose a low risk for forced labour and/or child labour.
Card Packaging	InComm procures the majority of its card packaging services from organizations located in Canada and/or the United States of America as well. However, we also source minimal physical card packaging from China. Certain regions of China are associated with a country risk for forced labour for certain types of products. However, the products sourced by InComm are not sourced from regions of China associated with forced or child labour, and the types of products sourced by InComm are not identified as having any known risks of forced labour according to the List of Goods Produced by Child or Forced Labour published by the US Bureau of International Labor Affairs.
Card Displays	InComm's marketing and design partners are all located in Canada and/or the United States of America and pose a low risk for forced labour and/or child labour.

POLICIES AND DUE DILIGENCE

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We aim to foster a trusting, open and inclusive environment within our business and treat each person we deal with in a manner that reflects our values. We expect all our people to treat each other, and those we deal with, respectfully and with dignity. We do not tolerate physical violence, threats, verbal abuse, disrespectful behaviour, bullying or harassment of any kind.

Demonstrative of this, our employee Code of Conduct requires employees to be honest and ethical in all work and professional relationships, to treat everyone fairly and courteously, to have mutual respect in the workplace and not to engage in any unlawful or unethical activity. Violations of our Code of Conduct are investigated thoroughly and may result in disciplinary action, including immediate termination.

We encourage our people to raise ethical and legal concerns, including any concerns about human rights issues. We also stress that we have zero tolerance for retaliation against anyone who speaks up in good faith. We respect and comply with all laws, rules and regulations which apply to our business, as well as human rights and fair employment practices.

In addition to our Code of Conduct, InComm has a number of controls, policies and processes in place to assess, prevent and/or address the risk of occurrences of child and forced labour. The following policies described below are applicable to the Company and guide our commitment to upholding our ethical responsibilities:

Policy	Overview and Application
Code of Conduct Policy	The Code of Conduct Policy sets forth the principles that foster a safe and healthy work environment and fair business practices to help all of our employees make informed decisions. InComm's goal is not just to comply with the laws and regulations that apply to our business; we also strive to abide by the highest standards of employee conduct. Our policy requires employees to be honest and ethical in all work and professional relationships, to treat everyone fairly and courteously, to have mutual respect in the workplace and not to engage in any unlawful or unethical activity. Violations of our Code of Conduct are investigated thoroughly and may result in disciplinary action, including immediate termination. Any violations can be reported through our confidential, 24-hr Code of Conduct Hotline. We guarantee that no one will be subject to retaliation when making a good faith effort to report suspected violations.
Modern Slavery Policy	This global policy affirms InComm's zero-tolerance approach and commitment to the broader global movement seeking to eradicate all forms of modern slavery. The policy also demonstrates our commitment to forming relationships with businesses that align with our values; mitigate, detect and respond to modern slavery risks should they arise; and ensure compliance and support with this Policy.
Procurement Policy	This policy outlines the fundamental goals and guiding principles of the procurement of third-party goods and services and key controls for purchasing transactions to ensure the procurement of goods and services is properly controlled and approved, including following sound and ethical procurement practices as well as compliance with legal and regulatory requirements.

Vendor Risk Management Policy	InComm maintains important relationships with many third parties to provide a range of products and services for InComm. Effective vendor risk management processes help to build sustainable and positive relationships, minimize risk, reduce financial errors, maintain legal and regulatory compliance, and protect the information and data critical to our business. This policy establishes the minimum requirements for management, oversight and stewardship of vendor relationships in various circumstances, including the performance of due diligence prior to contracting, ongoing monitoring and internal reporting during the duration of the relationship commensurate with levels of risk/complexity, contingency planning for critical vendors, and/or periodic independent reviews.
Workplace Violence & Threats Policy	This policy sets forth InComm's stance on violence and threats of credible nature in the workplace, and applies to all business units, departments and functions, as well as all contractors, consultants and third-party service providers. When threatening behavior or acts of violence are exhibited, committed or reported, InComm will initiate an investigation into the incident. This investigation may include, but is not limited to, an evaluation by InComm's Employee Assistance Program, InComm's Threat Assessment Team and external professionals. Violation of this policy will result in disciplinary action and/or immediate termination of services/relationship and the involvement of appropriate law enforcement authorities.
Whistleblower Policy	This policy upholds accessible and established channels for whistleblowers across InComm to identify and raise concerns including modern slavery risks. Our policy contains details of how we investigate and manage any complaints and provides our personnel with an anonymous mechanism through which to raise concerns. Our personnel are made aware of the Whistleblower Policy and understand that they can safely and confidentially flag any perceived or actual modern slavery risks as they may arise within InComm.

RISKS OF FORCED LABOUR OR CHILD LABOUR IN OUR OPERATIONS AND SUPPLY CHAINS

Identifying Potential Risks in Our Operations and Supply Chains

- Risks in our Direct Operations

Given that InComm's direct operations are located in Canada, and that our workforce is largely comprised of office/skilled workers, we believe the risk of forced labour and/or child labour in our direct operations is low. Additionally, our human resources, legal and business teams are closely involved in our recruiting and employment processes to ensure compliance with the relevant standards currently in force in Canada and across the provinces where we do business, and our personnel reside.

- Risks in our Supply Chain

As a technology company, the vast majority of the products and services that we create and provide are intangible. Tangible goods in our supply chain are largely limited to the physical production or printing of prepaid and/or gift cards and certain related packaging and marketing/in-store displays. Nearly all of our direct suppliers for the physical production and printing of cards are located in Canada and the U.S. Given the nature of our industry as well as the location of most of our direct suppliers, we believe the risk of forced labour and/or child labour in our direct suppliers to be low.

STEPS TAKEN TO ASSESS AND MANAGE THE RISKS IDENTIFIED

The Company took the following steps to prevent or reduce the risk of child and forced labour in its supply chains during the Reporting Period:

- Consideration of the latest governmental advice and guidance;
- Conducted an internal gap analysis and assessment of risks of forced labour and/or child labour in our activities and supply chains;
- Reviewed contractual terms in vendor and/or supplier agreements to ensure inclusion of clauses addressing forced labour and child labour;
- Continued to carry out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour;
- A review of our risk management infrastructure including, but not limited to, applicable governance bodies, policies, procedures and legal obligations; and
- Developed training and awareness materials on forced labour and child labour.

MEASURES TAKEN TO REMEDIATE FORCED LABOUR, CHILD LABOUR, OR LOSS OF INCOME

As of the date of this Report, InComm has not identified any instances or allegations of forced or child labour within its own workforce or its supply chain. Accordingly, no steps were taken to remediate child or forced labour or the loss of income associated with remediation efforts.

Additionally, we acknowledge that forced labour and child labour risks are constantly evolving and we aim to continuously improve our identification, management and mitigation strategies going forward to ensure ongoing relevance and compliance. We will continue to assess and reassess the risks in our direct operations and supply chain to proactively identify any new areas where human rights risks may arise.

TRAINING

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values. We require mandatory regulatory compliance training of all new hires plus annual training for all employees. The curriculum consists of various training and refresher courses, including a course on modern slavery and human trafficking. This is in addition to modules that are relevant to modern slavery and human trafficking, such as ethics, anti-discrimination, anti-harassment and sensitivity, anti-money laundering and acknowledgment of the InComm Code of Conduct and Employee Handbook. The objectives of the training include raising awareness of the existence and prevalence of forced labour and child labour,

being able to identify red flags of potential human rights violations, understanding the importance of conducting due diligence for third parties in the Company's supply chain, as well as each individual's responsibility in speaking up and how to report potential human rights violations.

On an ongoing basis we review our curriculum to ensure it is contemporary and relevant; we have taken modern slavery and human trafficking into account in such review, and we intend to continue to do so.

ASSESSING EFFECTIVENESS

Based on our review of our existing policies and practices which address modern slavery and human trafficking risks, InComm believes that our operational risk of forced labour and child labour is low. We apply due diligence processes to our tier 1 direct suppliers and require that they comply with all applicable domestic and international laws. Our workforce is largely comprised of office and skilled workers who are all located in Canada, and through our recruitment, training and compliance measures, we believe that our risk of forced labour and child labour in our work force is low as well. We continue to be guided by our policies and principles in our own business and in our relationships with all those we continue do business with.

InComm understands the importance of promoting good practice in relation to the prevention of forced labour and child labour, both internally and when working with our partners. We will continue to monitor, develop and improve our practices in respect of combatting modern slavery and human trafficking.

Our internal stakeholders and relevant cross-functional teams are committed to ongoing discussions and working to regularly assess and audit risk areas and potential improvements. As we continue the development of this program to prevent and reduce the risks of child labour and forced labour in our supply chains and operations throughout 2026, we will consider and implement further measures to better quantify and assess the effectiveness of our processes.

APPROVAL & ATTESTATION

This Report was approved by the Board of Directors of InComm pursuant to subparagraph 11(4)(a) of the Act on May 29, 2026.

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 or entities 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.

I have the authority to bind **InComm Canada Prepaid, Inc.**
M. Brooks Smith
Director
May 29, 2026