



Doxim Solutions ULC

Forced Labour and Child Labour in Supply Chains Company
Assessment



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Introduction

This report is Doxim Solutions ULC (“Doxim”)’s response to Bill S-211, an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act), sections 11(1) and 11(3). Doxim is committed to the protection of human rights in all Doxim’s business practices and operations. This includes the prevention of modern slavery, forced labour and child labour in both our internal business practices and supply chain operations.

Doxim satisfies the definition of an Entity within the Act by having a place of business in Canada, doing business in Canada, having assets in Canada and meeting both the revenue and asset thresholds.

The financial reporting year of Doxim covered by this report is January 1 to December 31, 2023.

Structure, Activities & Supply Chain

Structure

Doxim operates as a private corporation at 1380 Rodick Road, Suite 102, Markham, ON, Canada L3R 4G5.

Doxim was founded in 2000, specializing in customer communications management and engagement technology. Doxim has expertise across various industries including financial services (i.e., banks, credit unions, wealth management, auto and consumer finance, insurance), utilities, healthcare, and account receivables management.

Activities

Doxim operates within the communications service industry, providing end-to-end communications, engagement, and payment from a single partner. Doxim’s solutions include Doxim Customer Communications Management (CCM), Doxim Payment, and Customer Engagement Management (CEM).

Doxim Customer Communications Management (CCM): CCM is a technology-enabled managed service that generates regulated, personalized, omnichannel communications at scale, and delivers them in the customers' preferred channel. A self-serve client portal provides on-demand access to reporting and insights and allows clients to administer key aspects of their communications for greater speed and agility.

Doxim Payment: Doxim Payment offers a frictionless, end-to-end billing-to-payment experience for customers and staff. It provides flexible payment methods and channels, an easy-to-use biller portal, and tools to reduce sales outstanding, ease the operational burden of reconciliation, and lower the cost per transaction.

Customer Engagement Management (CEM): this service is offered to our banking and credit union clients for streamlined accounting opening, loan origination, and customer relationship management (CRM) to maximize engagement, customer service, and wallet share.

There are 170 total employees that work for Doxim, allocated among the departments of sales, customer experience, marketing, product management, professional services, R&D, client services, IT, electronic processing, print imaging, office of the President, finance, and people & culture. Figure 1 illustrates the distribution of Doxim's employees across various locations.

Supply Chain

100% of Doxim's top suppliers for physical goods procurement come from Canada. Note, this analysis was performed over material suppliers which, for the purposes of this report, are those suppliers who account for at least 1% of Doxim's total physical goods procurement spend over the 2023 fiscal year. As a communications service provider, Doxim's main categories of products include paper (paper, envelopes), printer ink, printers and computer equipment.

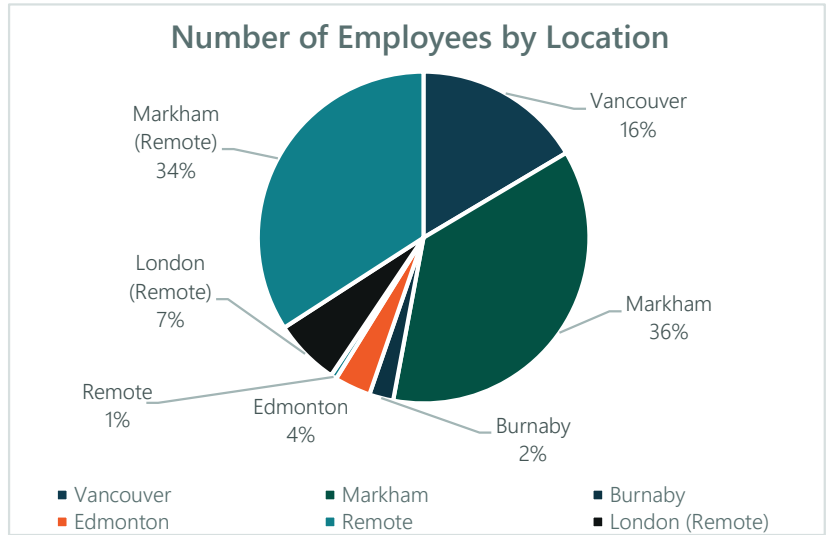


Figure 1

Policies & Due Diligence Processes

Doxim has the following policies and due diligence procedures in place to mitigate the risk of child labour and forced labour within internal activities and their supply chain:

Internal Policies

Policy	Description	Support in Mitigating Risk of Forced Labour and Child Labour
Sustainability Policy	This policy outlines Doxim's commitment to being environmentally aware and actively supporting programs that reduce our company's environmental impact, and continually improve our environmental performance as an integral part of the business strategy and operating procedures.	A sustainability policy provides a framework for Doxim to integrate social, environmental, and ethical considerations into our business operations, contributing to the prevention of forced labour and child labour. By promoting responsible business practices, companies can play a crucial role in advancing the fight against exploitation and abuse in global supply chains.

<p>Discrimination and Harassment</p>	<p>The Business Code of Ethics and Code of Conduct (the “Code”) states that Doxim prohibits inappropriate conduct regardless of whether it constitutes unlawful harassment. Employees are required to treat each other fairly, openly and with respect. For transparency purposes, the Code defines the term harassment and inappropriate conduct.</p>	<p>Should a harassment incident arise, employees have a responsibility to report incidents of harassment or inappropriate conduct to their manager and/or Human Resources. Doxim will respond promptly to all complaints to resolve them efficiently, confidentially, and fairly. Therefore, like the function of a whistleblower, if an issue were to arise related to forced labour or child labour, this reporting process is a mechanism in place to identify and alert the management of Doxim who then would tend to the resolution efforts.</p>
<p>Workplace Violence</p>	<p>Doxim adopts a zero-tolerance policy for workplace violence. For transparency purposes, the Code defines the acts of violence. Similar to the policy regarding discrimination and harassment, employees must report any act or threatened act of violence to a manager or Human Resources.</p>	<p>This policy contributes to fostering a workplace culture that prioritizes safety, respect, and dignity for all employees. By establishing clear guidelines on acts of violence and zero tolerance for violence and harassment, this policy creates an environment where employees feel safe and empowered to report any instances of misconduct, including suspected cases of child or forced labour.</p>
<p>Anti-Corruption</p>	<p>Doxim competes fairly for orders with the quality and price of our product and service offerings and not by offering improper benefits to others. We do not accept, offer, or engage in bribery or secret commissions to obtain or retain business, and we expect our employees, contractors, and independent practitioners to do the same. Doxim, all Doxim officers, directors, and employees, and all contractors or other third parties acting on behalf of or for Doxim will comply with this anti-bribery and anti-corruption policy and all applicable U.S. and Canadian laws and regulations relating to the prevention of bribery and corruption, including the U.S.</p>	<p>Forced labour and child labour often occur in industries or regions where bribery and corruption are prevalent. By implementing robust anti-bribery and anti-corruption measures, Doxim can reduce the risks of exploitation and abuse faced by vulnerable workers, including children. In addition, preventing bribery and corruption create a transparent business environment where labour rights are respected and enforced.</p>

	Foreign Corrupt Practices Act of 1977, as amended.	
Anti-Money Laundering and Countering Terrorist Financing	The Code explicitly states that Doxim conducts business with reputable customers, consultants, and businesses who are involved in lawful business activities. Doxim’s reputation and clients require that Doxim have robust procedures in place to detect, prevent, and deter any money laundering and to prevent the ability of terrorist groups to benefit from Doxim and our systems.	Reputable customers, consultants, and businesses are less likely to engage in practices like forced or child labour. Reputable businesses are expected to adhere to ethical standards and legal regulations, reducing the likelihood of involvement in such practices. In addition, Doxim’s procedures can help identify and avoid working with entities involved in illegal activities including forced or child labour.
Methods of Reporting Concerns	We take our reputation and clients’ reputation seriously and expect our employees to do the same. Any reported violation of the Code of Ethics and Business Conduct will be investigated and, where appropriate, violations can result in a disciplinary letter, suspension, or termination.	Doxim has an external channel (an independent third party) called Lighthouse that offers individuals the choice to report anonymously. Therefore, similar to a whistleblower-protection policy, this channel will allow employees to express any concerns related to forced or child labour without fear of retaliation.

Due Diligence Processes

Doxim engages vendors with whom we have long-standing relationships and have not encountered any known instances of risks associated with forced or child labour. All vendors are bound by the terms they sign, which are stated in the purchase orders or supplier agreements. Terms vary per agreement.

Supplier Questionnaire

The majority of our US entities’ suppliers are required to complete a supplier questionnaire. The nature of this questionnaire is to ensure the financial stability, quality system information, employees, physical security, cyber security, SOC 1 or SOC 2 corporate audit report, supply chain management, etc. of the suppliers. Questions specific to the risk of child labour or forced labour have not yet been incorporated into this questionnaire. However, Doxim has identified the opportunity to integrate this questionnaire, including questions related to forced labour and child labour, into our onboarding process in the future for the Canadian entity.

Recruiting

From an operational perspective, many of the external labourers Doxim contracts for are through a reputable recruiting agency. The company explicitly states in its terms that it complies with all applicable legislation, including labour and employment legislation. In addition, as part of our human resource processes, Doxim verifies new employees’ identities



and social insurance numbers. This provides Doxim with an opportunity to detect that all newly hired employees are legally eligible to work in Canada and are of legal age.

Supply Chain Risk Assessment

A risk assessment over Doxim's industry of operation, goods procured and countries goods are procured from has been performed over material direct suppliers. This risk assessment used two separate indices to conclude on inherent risk of child labour and/or forced labour related to goods and countries - Walk Free's Global Slavery Index and the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour.

Industry of Operation

Doxim operates within the industry of communications services that involves a significant usage of paper. Given the two indices noted above have identified risks of child labour and forced labour inherent to the service and timber industries, it is concluded that Doxim's operating industry has an **inherent risk exposure**. However, this risk is mitigated for Doxim as Doxim has been assessed and certified as meeting the requirements of Forest Stewardship Council (FSC)'s FSC™ Chain-of-Custody by SGS Auditors, which encompasses the FSC Core Labour Requirements. Notably, the FSC Core Labour Requirements include clauses regarding the prohibition of forced labour and child labour.

Goods Procured

Doxim has six (6) categories of products. A risk assessment over the goods procured from material suppliers noted above focusing on standard materials utilized in the manufacturing of these goods has been conducted and identified an **initial inherent risk** of forced labour and/or child labour within the following categories:

- 1) Timber – paper and envelopes
- 2) Copper – used for ink pigment
- 3) Zinc – used for ink pigment
- 4) Coal – carbon black for black ink
- 5) Cobalt ore – used for ink pigment
- 6) Electronics – printers and computer equipment

Countries Which Goods Are Procured From

For the purposes of a risk assessment over the countries goods are procured from, this report focuses on direct material suppliers only – those accounting for at least one percent (1%) of the total physical goods spend during the 2023 fiscal year.

100% of physical goods suppliers are from Canada, which has been identified as a source country that has a **low inherent risk** of using both child labour and/or forced labour according to the two indices noted above. Although they are based out of North America, it is unknown to Doxim where these vendors purchase their goods/materials from, which could expose the supply chain to inherent risk related to originating source countries.

Remediation of Forced Labour & Child Labour and Vulnerable Family Income Loss

Doxim is in the process of understanding and evaluating our supply chain related to the risk of child labour and forced labour. To date, Doxim has not identified instances of the use of child labour or forced labour within our operations or those of suppliers. Doxim is continuing the review of procurement practices to enhance the rigor of our due diligence processes including raising awareness with our suppliers.

Awareness Training

Doxim does not have training in place specifically on the topic of child labour or forced labour. However, when onboarding new employees, part of this process includes reviewing all policies, which are available to all employees on Doxim's HR portal, to ensure the individual understands Doxim's standards and expectations. Employees are required to sign off to acknowledge and confirm their review of these policies. Sections within this relevant to child labour and forced labour include sustainability policy, act of discrimination and harassment, act of violence, anti-corruption, anti-money laundering and countering terrorist financing, and methods of reporting concerns (which acts as a whistleblower protection policy).

Doxim recognizes the opportunity to enhance employee training relevant to this Act and, therefore, will be evaluating applicable training for staff in the foreseeable future.

Assessing Effectiveness

To track Doxim's effectiveness of procedures to mitigate the risk of child labour and forced labour, the following mechanisms are in place:

Doxim Activities

1. **Reporting systems:** Doxim has created a safe space to report instances of inappropriate and/or unethical activities without the fear of retaliation. Lighthouse is an independent third-party channel which provides an anonymous platform for Doxim employees to report serious concerns and ethical violations. Child labour and forced labour often occur in hidden or remote locations, making detection challenging. A system to report instances of unethical behaviour encourages individuals with knowledge of such exploitation to come forward confidentially, ensuring that instances of abuse are reported and addressed promptly.
2. **Total harassment and violence incidents:** Doxim has a zero-tolerance for workplace harassment and violence. All claims made regarding harassment will be reported to Human Resources and CPO, including a thorough



investigation and action plan to resolve the issue in a timely manner.

3. **Employee training:** Doxim will continue to monitor employee document review acknowledgments to ensure awareness and understanding of Doxim's policies.
4. **Governance:** Doxim will continue to monitor and assess compliance with the Business Code of Conduct and Code of Ethics and review identified policies on an as-needed basis.

Supplier Activities

1. **Supplier Agreements:** Doxim has identified the opportunity to implement a clause within supplier agreements regarding zero-tolerance for child labour and forced labour. This clause will identify the outcome or, disciplinary action should an instance of child or forced labour be report or discovered by Doxim.
2. **Supplier Questionnaire:** We are currently exploring options around distributing a questionnaire to our suppliers, which will include specific questions regarding child labour and forced labour.
3. **Governance:** each parameter of supplier activities will be reviewed on an as-needed basis.

Steps Taken to Prevent & Reduce Risk of Child Labour or Forced Labour

Doxim has taken the following steps to prevent and reduce the risk of child labour or forced labour:

1. **Mapping supply chains:** As part of this report, we have mapped our supply chain to complete a risk assessment to align with the Act.
2. **Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains:** As part of this report, Doxim has identified risks within our activities and supply chain that have inherent risks of child labour and/or forced labour.
3. **Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains:** As part of this report, Doxim assesses the risks associated with the goods procured against global forced labour and child labour benchmarks and indices.
4. **Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily:** Human resources checks new employee information to ensure they are legally permitted to work at Doxim. Future checks will evaluate additional aspects of the recruitment process.
5. **Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour:** Remediation efforts relating to due diligence mechanisms in place have been identified, to reduce the risk of child labour and/or forced labour within the supply chain.
6. **Developing and implementing anti-forced labour and/or -child labour contractual clauses:** Doxim has identified the opportunity to integrate contractual clauses within supplier agreements related to anti-forced labour and/or child labour.
7. **Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists:** Doxim is in the process of rolling out an Employee Handbook that will be available to all employees. Doxim has identified the opportunity to integrate anti-forced labour and/or child



labour standards/conduct into internal policies (Employee Handbook and training) as well as supplier due diligence procedures (supplier agreements and questionnaires).

8. **Monitoring suppliers:** Doxim will implement supplier questionnaires for the Canadian entity to monitor supplier relationships. This function has been identified as an opportunity to align questions to the use of forced labour and/or child labour.
9. **Developing and implementing training and awareness materials on forced labour and/or child labour:** Doxim has identified the opportunity to develop employee training relevant to child labour and/or forced labour.