

## BlackBerry Limited's Report on Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act

**1. This report is for:**

- ☒ An entity  
☐ A government institution

**2. Legal name of reporting entity or government institution**

BlackBerry Limited

**3. Reporting year:**

May 31, 2025

**4. Financial year covered by the report:**

Start Date: March 01, 2024

End Date: February 28, 2025

**5. Is this a revised version of a report already submitted this reporting year?**

- ☐ Yes  
☒ No

**6. For entities only: Business number(s):**

87132 6179

**7. For entities only: Is this a joint report?**

- ☐ Yes  
☒ No

**8. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?**

- ☒ Yes  
☐ No

**8.1 If yes, indicate the applicable law(s). Select all that apply.**

- ☒ The United Kingdom's *Modern Slavery Act 2015*  
☐ Australia's *Modern Slavery Act 2018*  
☐ California's *Transparency in Supply Chains Act*  
☐ Germany's *Act on Corporate Due Diligence Obligations in Supply Chains*  
☐ France's *Duty of Vigilance Act*  
☐ Norway's *Transparency Act*  
☐ Other, please specify:

**9. For entities only: Which of the following categorizations applies to the entity? Select all that apply.**

- ☒ Listed on a stock exchange in Canada  
☒ Canadian business presence (select all that apply):  
☒ Has a place of business in Canada  
☒ Does business in Canada

☒ Has assets in Canada

Meets size-related thresholds (select all that apply):

☒ Has at least \$20 million in assets for at least one of its two most recent financial years

☒ Has generated at least \$40 million in revenue for at least one of its two most recent financial years

☒ Employs an average of at least 250 employees for at least one of its two most recent financial years

**10. For entities only: Which of the following sectors or industries does the entity operate in? Select all that apply.**

☐ Agriculture, forestry, fishing and hunting

☐ Mining, quarrying, and oil and gas extraction

☐ Utilities

☐ Construction

☒ Manufacturing

☐ Food manufacturing

☐ Beverage and tobacco product manufacturing

☐ Textile mills

☐ Textile product mills

☐ Apparel manufacturing

☐ Leather and allied product manufacturing

☐ Wood product manufacturing

☐ Paper manufacturing

☐ Printing and related support activities

☐ Petroleum and coal product manufacturing

☐ Chemical manufacturing

☐ Plastics and rubber products manufacturing

☐ Non-metallic mineral product manufacturing

☐ Primary metal manufacturing

☐ Fabricated metal product manufacturing

☐ Machinery manufacturing

☒ Computer and electronic product manufacturing

☐ Electrical equipment, appliance and component manufacturing

☐ Transportation equipment manufacturing

☐ Furniture and related product manufacturing

☐ Other manufacturing

☐ Wholesale trade

☐ Retail trade

☐ Transportation and warehousing

☐ Information and cultural industries

☐ Finance and insurance

☐ Real estate and rental and leasing

☐ Professional, scientific and technical services

☐ Management of companies and enterprises

- ☐ Administrative and support, waste management and remediation services
- ☐ Educational services
- ☐ Health care and social assistance
- ☐ Arts, entertainment and recreation
- ☐ Accommodation and food services
- ☐ Other services (except public administration)
- ☐ Public administration
- ☒ Other, please specify: Software Publisher

**11. For entities only: In which country is the entity headquartered or principally located?**

Canada

**10.1 If in Canada: In which province or territory is the entity headquartered or principally located?**

Ontario

**Part 2 - Annual Report - Reporting for entities**

**1. Which of the following accurately describes the entity's structure?**

- ☒ Corporation
- ☐ Trust
- ☐ Partnership
- ☐ Other unincorporated organization

**2. Which of the following accurately describes the entity's activities? Select all that apply.**

- ☐ Producing goods (including manufacturing, extracting, growing and processing), in Canada
- ☒ Producing goods (including manufacturing, extracting, growing and processing), outside Canada
- ☒ Importing into Canada goods produced outside Canada
- ☐ Controlling an entity engaged in producing goods, in Canada
- ☐ Controlling an entity engaged in producing goods, outside Canada
- ☐ Controlling an entity engaged in importing into Canada goods produced outside Canada

**3. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.**

- ☒ Mapping activities
- ☒ Mapping supply chains
- ☒ Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- ☐ Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- ☒ Developing and implementing an action plan for addressing forced labour and/or child labour
- ☒ Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- ☒ Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour

- ☒ Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- ☒ Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- ☒ Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- ☒ Developing and implementing child protection policies and processes
- ☒ Developing and implementing anti-forced labour and/or -child labour contractual clauses
- ☒ Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- ☒ Auditing suppliers
- ☒ Monitoring suppliers
- ☒ Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- ☒ Developing and implementing grievance mechanisms
- ☒ Developing and implementing training and awareness materials on forced labour and/or child labour
- ☒ Developing and implementing procedures to track performance in addressing forced labour and/or child labour
- ☒ Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- ☒ Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- ☐ Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- ☐ Information not available for this reporting period
- ☐ Other, please specify:

#### 4. Please provide additional information describing the steps taken.

BlackBerry has engaged in the respective steps outlined above as part of its ongoing efforts to prevent and reduce the risk of forced labour that it established within its operations several years ago. As part of those efforts in 2024, BlackBerry filed its annual "[Conflict Minerals Disclosure and Report](#)" to the U.S. Securities and Exchange Commission which outlines its efforts concerning responsible mining and sourcing of minerals in conflict-affected regions of the world, in particular within the Democratic Republic of Congo and its neighboring countries. These efforts are related to BlackBerry's supply chain for component parts utilized within its BlackBerry Radar product, which represents a very small portion of BlackBerry's overall business.

BlackBerry's operations are predominately focused on software development for which the risk of forced labour or child labour is virtually non-existent given the policies and procedures in place to manage these elements through BlackBerry's own hiring and human resource practices.

BlackBerry reviewed and updated its Human Rights Policy and Supplier Code of Conduct in 2023 which include several elements geared toward the prevention of forced and/or child labour.

**5. Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour?**

- ☒ Yes  
☐ No

**5.1 If yes, which of the following elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.**

- ☒ Embedding responsible business conduct into policies and management systems  
☒ Identifying and assessing adverse impacts in operations, supply chains and business relationships  
☒ Ceasing, preventing or mitigating adverse impacts  
☒ Tracking implementation and results  
☒ Communicating how impacts are addressed  
☒ Providing for or cooperating in remediation when appropriate

**6. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

- ☒ Yes, we have identified parts of our activities and/or supply chains that carry risks to the best of our knowledge and will continue to identify emerging risks.  
☐ Yes, we have started the process of identifying parts of our activities and/or supply chains that carry risks, but there are still gaps in our assessments.  
☐ No, we have not started the process of identifying parts of our activities and/or supply chains that carry risks of forced labour or child labour being used.

**6.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.**

- ☐ The sector or industry it operates in  
☐ The types of products it produces, sells, distributes or imports  
☐ The locations of its activities, operations or factories  
☐ The types of products it sources  
☒ The raw materials or commodities used in its supply chains  
☐ Tier one (direct) suppliers  
☐ Tier two suppliers  
☐ Tier three suppliers  
☒ Suppliers further down the supply chain than tier three  
☐ The use of outsourced, contracted or subcontracted labour  
☐ The use of migrant labour  
☒ The use of forced labour  
☒ The use of child labour  
☐ None of the above  
☐ Other, please specify

**7. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.**

- ☐ Agriculture, forestry, fishing and hunting
- ☒ Mining, quarrying, and oil and gas extraction
  - ☐ Oil and gas extraction
  - ☒ Mining and quarrying (except oil and gas)
  - ☐ Support activities for mining, quarrying, and oil and gas extraction
- ☐ Utilities
- ☐ Construction
- ☐ Manufacturing
- ☐ Wholesale trade
- ☐ Retail trade
- ☐ Transportation and warehousing
- ☐ Information and cultural industries
- ☐ Finance and insurance
- ☐ Real estate and rental and leasing
- ☐ Professional, scientific and technical services
- ☐ Management of companies and enterprises
- ☐ Administrative and support, waste management and remediation services
- ☐ Educational services
- ☐ Health care and social assistance
- ☐ Arts, entertainment and recreation
- ☐ Accommodation and food services
- ☐ Other services (except public administration)
- ☐ Public administration
- ☐ None of the above
- ☐ Other, please specify

**8. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk.**

In FY2025, BlackBerry was predominantly a software company, and it used an Electronic Manufacturing Services ("EMS") provider to procure components and assemble its Transportation and Asset Tracking hardware products. Other than hardware suppliers providing components to the EMS, BlackBerry has no other direct materials supply chain. Our remaining vendor base consists of suppliers of goods and services supporting the operation of BlackBerry's global business and delivery of software and services to our customers.

BlackBerry recognizes there is potentially a greater risk of forced or child labour being utilized within the mining operations of the Democratic Republic of Congo or adjoining countries ("Covered Countries"), and as such, has implemented due diligence processes on the source and chain of custody of the necessary conflict minerals contained in products BlackBerry contracted to manufacture to ascertain whether these minerals originated in a Covered Country and directly or indirectly financed or benefited non-state armed groups in any of these countries. BlackBerry has designed its conflict minerals due diligence measures to conform with the Organization for Economic Development (OECD) Due Diligence



Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Further details of this approach are outlined within the [2024 BlackBerry SEC Conflict Minerals Disclosure and Report](#).

**9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

- ☐ Yes, we have taken measures
- ☐ No, we have not taken measures.
- ☒ Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

**10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains?**

- ☐ Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
- ☐ Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- ☐ No, we have not taken any remediation measures.
- ☒ Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

**11. Does the entity currently provide training to employees on forced labour and/or child labour?**

- ☒ Yes
- ☐ No

**11.1 If yes, is the training mandatory?**

- ☒ Yes, the training is mandatory for all employees.
- ☐ Yes, the training is mandatory for employees making contracting or purchasing decisions.
- ☐ Yes, the training is mandatory for some employees.
- ☐ No, the training is voluntary.

**12. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?**

- ☒ Yes
- ☐ No

**12.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply.**

- ☒ Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- ☒ Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- ☐ Partnering with an external organization to conduct an independent review or audit of the organization's actions
- ☐ Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

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**Attestation by BlackBerry Board of Directors**

This report has been reviewed and was approved by the BlackBerry Board of Directors on April 1, 2025.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Chief Executive Officer of BlackBerry Limited, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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 within this report.



**John Giamatteo**

Chief Executive Officer of BlackBerry Limited

4-1-25

**Date of Signature**

*I have the authority to bind BlackBerry Limited*