



25 Industrial Drive, Hay River, NT X0E0R6
867.874.3333
108 Berry Street, Yellowknife, NT X1A 2R3
867.873.6112

Business Report: Compliance with Bill S211 in Buffalo Airways Ltd.

Entity' legal name: Buffalo Airways Ltd.
Financial Reporting Year: April 1, 2023, to March 31, 2024
Business number: 138845870
Sector/Industry: Air transportation and aerial fire suppression
Location: Northwest Territories
Entity Categorization: Buffalo Airways Ltd is a corporation that has a place of business in Canada, does business in Canada and meets 2 of the following conditions according to the Act in one fiscal year ending March 31, 2024. It is the first year that Buffalo Airways Ltd meets the 2 conditions such as:

- i. it has at least \$20 million in assets,
- ii. it has generated at least \$40 million in revenue

In all prior years of operation, Buffalo Airways Ltd only meet 1 condition which is having \$ 20 million in assets.

Introduction: As a company operating in Canada, Buffalo Airways Ltd. recognizes the significance of Bill S211, which has recently become a legal requirement. This report assesses our current compliance status with Bill S211 and outlines our strategies for future alignment.

Background Information: Bill S211, now enacted into law in Canada, mandates the purpose of this Act is to implement Canada's international commitment to contribute to the fight against forced labour and child labour through the imposition of reporting obligations on

- (a) government institutions producing, purchasing or distributing goods in Canada or elsewhere; and
- (b) entities producing goods in Canada or elsewhere or in importing goods produced outside Canada.

Compliance with this legislation is imperative for the aviation industry and aligns with Buffalo Airways Ltd.'s commitment to corporate responsibility and legal compliance.



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Recognition of Importance: Buffalo Airways Ltd. acknowledges the importance of adhering to Bill S211 as a legal obligation. Compliance not only ensures our adherence to regulatory requirements but also reinforces our dedication to ethical business practices and aviation safety.

Previous Financial Year Compliance Status: As of fiscal year, ending March 31, 2024, Buffalo Airways Ltd had no knowledge of Bills S-211. It only came to our attention this month of April 2024 when our custom broker sent an email regarding Bill S-211 reporting. Fiscal year April 1, 2023 to March 31, 2024 is the first year ever the entity has meet the 2 conditions required. From all the prior fiscal years, the entity only meets 1 condition which is the \$20 million assets.

Current Compliance Status: Buffalo Airways Ltd. has taken initial steps to assess our compliance with the provisions of Bill S211. While we have made progress in understanding the requirements of the legislation, full implementation is still underway.

In compliance to subsection 11(3), Below are the detailed information.

- **(a) Structure, activities, and supply chains:** Buffalo Airways Ltd is a corporation that has a main operation in Northwest Territories with offices located in Yellowknife and Hay River. It also has a hangar located in Red Deer, Alberta used mainly for repairing aircrafts. Buffalo Airways Ltd mandate/role is to provide charter or non-scheduled flights and fire fighting services. It only operates in Canada with total employees of less than 100 in peak season and around 65 in regular season. As part of maintaining the aircrafts, Buffalo Airways Ltd, imports aircraft parts used or new from the USA to reliable vendors that adhere to labour laws. See attached Schedule A for more details including kinds and volumes of goods imported and the locations from which the goods are imported.
- **(b) Policies and due diligence processes:** Currently, Buffalo Airways Ltd has no written policies and due diligence processes on how to identify and respond to the real and potential adverse impacts of activities pertaining to forced labour and child labour. The company's practice and procedure in procuring aircraft parts is to ensure that parts are bought to reliable companies that are expected to adhere to labour laws which why it mainly imports from USA due to proximity and awareness of the company's reputation.
- **(c) Forced labour and child labour risks:** Buffalo Airways Ltd has no knowledge of any risks associated with forced labour and child labour from its



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importation activities of aircraft parts from its vendors located in USA. Even if there are risks, the company has lacking capacity to identify it considering the lack of resources and knowledge on how to spot the risks. Additionally, some vendors that Buffalo Airways Ltd imports the aircraft parts do not produce the parts but also buy it from other vendors. In effect we are the end users/customers of the parts wherein some are new, and some are used parts.

- **(d) Remediation measures:** Buffalo Airways Ltd has not taken any measures as it is not applicable since it is not aware of any risks of forced labour and child labour on its importation of aircraft parts from its vendors located in USA.
- **(e) Remediation of loss of income:** Buffalo Airways Ltd has not taken any measures as it has no knowledge of risks forced labour or child labour in its importation activities. Hence, no awareness of any vulnerable individual's loss of income.
- **(f) Training:** Buffalo Airways Ltd has no current training in place but now that the company has awareness and understanding of the impact of forced labour or child labour associated to importation activities, it will educate and provide information to department in charge of purchasing and importing aircraft parts to be cognizant on the risks of forced labour or child labour. If they suspect potential risks of forced labour or child labour, they are obliged to report to management so that management will make necessary action and to report to authority if sufficient evidence proved there is real risks.
- **(g) Assessing effectiveness:** Buffalo Airways Ltd has not taken any actions to assess their effectiveness in preventing and reducing risks of forced labour and child labour in their importation activities.

Challenges and Considerations: Our compliance efforts have encountered several challenges:

- Interpretation of complex legal language and regulatory nuances specific to the aviation industry.
- Resource allocation, including time, budget, and personnel, to address compliance requirements while maintaining operational efficiency.



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- Identifying and maintaining a procedure to “audit” our international vendors to make sure they are complying with Bill S211

Future Compliance Strategies: To ensure ongoing compliance with Bill S211, Buffalo Airways Ltd. is committed to:

1. Conducting a thorough review our import procedures to identify areas of non-compliance and develop tailored solutions.
2. Enhancing company training programs to promote understanding and adherence to regulatory requirements related to Bill S211.
3. Establishing clear accountability mechanisms and safety management systems to monitor compliance efforts and address any discrepancies promptly.
4. Engaging with regulatory authorities and industry partners to stay informed of evolving legal obligations and best practices.

Conclusion: In conclusion, Buffalo Airways Ltd. is dedicated to fulfilling our legal obligations under Bill S211 and maintaining a culture of compliance excellence in the aviation industry. By proactively addressing challenges and embracing regulatory requirements, we are confident in our ability to meet the standards set forth by this legislation while upholding our commitment to safe and reliable air transportation services.

Schedule A

Buffalo Airways Ltd.

List of vendors - imported

April 1, 2023 to March 31,

Vendors - outside Canada

Location

Imported Items - used and new

Total Costs

Currency

Vendors - outside Canada	Location	Imported Items - used and new	Total Costs	Currency
3-R SALES ***USD***	26751 Oak Avenue, Canyon Country CA USA 91351	small aircraft parts	24,106.75	USD
ACL AIRSHOP LLC	500 Park Commerce Road, Greenville, CS USA 29611	aircraft parts	20,950.04	USD
Anderson Aeromotive Inc. **US**	84 North D Street, PO Box 49 Grangeville, Idaho USA 83530	major aircraft parts/overhauled parts	94,134.96	USD
BOEING COMPANY *USD*	PO Box 3707, Seattle, WA USA 98124-2207	aircraft parts	18,346.27	USD
BRIDGER AEROSPACE	90 Aviation Lane, Belgrade, MT USA 59714	major aircraft parts/overhauled parts	250,000.00	USD
Brown Helicopter Inc. ***USD***	10100 Aileron Avenue, Pensacola, FL USA 32506	aircraft parts	846.00	USD
GOODRICH CORPORATION ***US	PO Box 840576, Dallas, TX USA 75284-0576	major aircraft parts	115,994.00	USD
LEGACY AVIATION SERVICES	1701A North Cimarron Yukon, Oklahoma USA 73099	small aircraft parts	2,484.00	USD
Mark Airmotive, Inc. **USD**	720 East 3rd Avenue, Moses Lake WA USA 98837	small aircraft parts	7,725.00	USD
Pacific Propeller Int'l LLC **USD**	PO Box 1187, Kent, WA USA 98035	major spare parts /overhauled parts	322,524.76	USD
PRIME TURBINES	1615 Diplomate Drive, suite 120, Carrollton, TX USA 75006	major spare parts	291,445.00	USD
QUALITY AIRCRAFT PARTS INC.	5551 NW 159 Street, Miami Gardens, FL USA 33014	aircraft parts	10,930.16	USD
SEGERS AERO CORPORATION ***USD***	8100 Mcgowing Dr, Fairhope, AL USA 365325591	major aircraft parts	135,000.00	USD
Sun Air Parts ***USD***	26007 Huntington Lane, Valencia, CA USA 91355-4667	small aircraft parts	5,611.00	USD
TACTAIR	4100 W 150th Street, Cleveland, OH USA 44135	small aircraft parts	11,216.00	USD
UNIVERSAL AVIONICS	3260 E Universal Way, Tucosn, AZ USA 85756	small aircraft parts	2,000.00	USD
VHL AIRCRAFT INC.	5000 NW 74 Avenue, Miami, FL USA 33166	aircraft parts	56,431.09	USD
WIPAIRE, INC. ***USD***	170 Hnery Avenue, South Saint Paul, MN USA 55075	aircraft parts	101,837.43	USD



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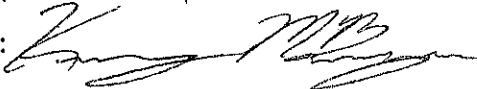
Attestation Report: Compliance with Bill S211

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.

Name: Kenny McBryan

Title: General Manager

Date: April 23rd, 2024

Signature: 

I have the authority to bind Buffalo Airways Ltd.