



**WORLDWIDE FLEET MANAGEMENT**

Report on the Fighting Against Forced Labour and Child  
Labour in Supply Chains Act

Financial Year Ended March 31, 2024

## Introduction

This report constitutes the first annual report prepared by Eagle Copters Ltd. pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “Act”). The report is a joint report made by Eagle Copters Ltd. and its wholly owned Canadian subsidiary, Eagle Copters Maintenance Ltd. (collectively, “Eagle Copters”, the “Corporation”, “we” or “us”) for the financial year starting on April 1, 2023, and ending March 31, 2024.

This report was produced by Eagle Copters to provide an overview of the organization, the industry it supports, the location of its customers and suppliers, and to provide an overall risk assessment of forced labour and child labour within its supply chain.

## Measures Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

For the previous fiscal year, Eagle Copters conducted an internal assessment of the risk of forced labour and child labour in our operations and supply chains. The internal assessment completed was a review of Eagle Copter’s procurement activities including parts, components, supplies, as well as services. The review looked at the value and quantities of such parts, supplies, and services that were purchased from each of our vendors or service providers to gain a better understanding of the risk of forced labour and child labour within our own supply chain. The assessment showed little to no risk within Eagle Copters’ supply chain, as most of our parts, supplies, or services are received from an OEM or vendor which currently have either a policy or statement regarding the use of forced labour and child labour within their own supply chain.

Eagle Copters will integrate training and awareness into the onboarding process of new vendors, employees, and our current staff as well as any required updates to our Code of Business Conduct and Ethics to ensure that the use of forced labour and child labour in our supply chain and overall business practices is not or has not been permitted.

## Structure, Activities, Supply Chains

Founded in Calgary, Alberta in 1975, Eagle Copters operates in the aviation maintenance, repair, and overhaul (MRO), sales, and leasing industries. Its full offerings include product development, engineering solutions, parts and component solutions, aircraft sales and leasing, MRO, and T53 Engine support.

Eagle Copters currently employs 130 individuals in which all are located within Calgary Alberta. All of Eagle Copters direct employees are full time and work on average between 35 and 40 hours per week.

The vast majority of Eagle Copter's supply chain consists of supplies of OEM (original equipment manufacturer) and aftermarket parts and components which are purchased to maintain Eagle Copter's leased aircraft fleet, complete maintenance and repair work for third party aircraft, and fulfillment for part sales direct to owners, operators, and other repair facilities worldwide operational supplies, such as office supplies, computer supplies, janitorial supplies, freight, and packaging, make up most of the supply chain that does not fall under OEM and aftermarket products.

By percentage spend, 62% of Eagle Copter's supplier geographic location is Canada, with the United States following at 37%. The remaining 1% consists of suppliers and service stations from other jurisdictions.

## Policies, Governance, and Due Diligence Processes

### **a. Code of Business Conduct and Ethics**

Eagle Copters is committed to observing the highest ethical principles and business standards. Upholding this commitment is essential to our continued success. Our Code of Business Conduct and Ethics (CBC) applies to of our business undertaking and transactions and applies to all our employees, contractors, agents, and representatives.

The CBC seeks to guide the behaviour in our work environment, and business relationships, and supports Eagle Copter's values of "honesty, integrity, and fairness above all else". The CBC details the standards of behaviour expected from all employees. While the CBC does not directly refer to issues of child and forced labour, it affirms the commitment of Eagle Copters to ensure everyone working on Eagle Copter's behalf adheres to the highest ethical principles and business standards.

## **b. Reporting Policy**

In accordance with the CBC, employees at all levels of the organization have the responsibility to report a concern or issue to the Board appointed Ethics Officer regarding, but not limited to, the use of forced and child labour within any part of Eagle Copter's supply chain. The Ethics Officer will maintain and ensure confidentiality for all CBC related issues brought to his or her attention.

## **Assessing and Managing the Risk of Forced Labour or Child Labour in our Supply Chain**

Eagle Copters will continue to assess our risk of exposure to forced labour and child labour by reviewing and understanding who we are procuring our parts and supplies from. Understanding where our vendors are located and where the products are coming from will help with this continued diligence.

Currently Eagle Copters considers its exposure to forced labour and child labour to be low due to the nature of the products being procured as well as the nature of the business conducted. Within our operations, our internal policies on business conduct and ethics ensure material compliance with applicable laws. As a federally controlled aerospace company, our operations are highly regulated, our employees are primarily highly skilled, and the industry we operate in does not have significant issues involving forced labour or child labour risks.

## **Remediation Measures**

Eagle Copters did not identify any instances of forced labour or child labour in our supply chain or operations in the last fiscal year. Therefore, no measures were taken to remediate an incident involving forced labour or child labour.

## Training

Training on topics within the Code of Business Conduct and Ethics is provided to newly hired, specified, or transferred employees before they begin their new duties. Annual refresher training is provided to all affected employees when required.

## Assessing effectiveness

Eagle Copters does not yet have any processes to evaluate the effectiveness of the measures in place to prevent and reduce forced labour and child labour risks. At a later stage, Eagle Copters intends to assess its effectiveness in preventing and reducing forced labour and child labour risks.

## Approval and Attestation

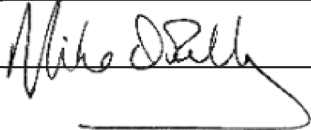
This report was approved by the CEO (Chief Executive Officer) and Chairman of the Board and President of Eagle Copters Ltd. as being a joint report of Eagle Copters Ltd. and Eagle Copters Maintenance Ltd. for the fiscal year ended March 31, 2024, pursuant to subparagraph 11(4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in the report for the 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, Mike O'Reilly, have the authority to bind Eagle Copters Limited.

Title: CEO & Chairman of the Board

Date: May 29, 2024

Signature: 

I, Jason Diniz, have the authority to bind Eagle Copters Limited.

Title: President

Date: May 29, 2024

Signature: 