



# Fighting Against Forced Labour and Child Labour in Supply Chains Act

# 2023 Report – Inland Technologies Canada Incorporated

#### 1. Introduction

This report has been prepared by Inland Technologies Canada Incorporated (Inland) in accordance with requirements under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) for our financial year ending September 30, 2023.

Inland operates within a privately held group of companies (Inland Group) offering aviation services in Canada, the United States of America, and the United Kingdom. Inland also manufactures aviation products in Canada that are used in Canadian operations and sold internationally. During peak winter operations, Inland has approximately 410 employees in Canada. Inland's corporate headquarters is located in Truro, Nova Scotia.

#### 2. Statement of Commitment

Inland recognizes that the aviation industry plays a role in assessing and preventing the risk of forced labour and child labour in Canada's supply chain. We acknowledge that risks of forced labour and child labour exist in all sectors and are committed to continuous improvement in our due diligence, risk assessment, remediation, and training processes.

Inland is committed to respecting, protecting, and promoting the human rights of people impacted by our operations and supply chain, consistent with the International Bill of Human Rights, ILO Core Conventions, UN Guiding Principles on Business and Human Rights, and OECD Guidelines for Multinational Enterprises.

# 3. Activities and Suppliers

Inland has a diverse range of business activities. Inland provides numerous aviation operational services, including the management and collection of airport wastewater, recycling of wastewater, aircraft de-icing, and aircraft fueling. Inland also recycles airport wastewater to produce glycol-based fluids used for aircraft deicing. Inland does not outsource its aviation services operations. These operations do require the procurement of regular support vehicles (i.e. pickup trucks) and specialized heavy equipment vehicles (i.e. de-icing trucks). These vehicles come from Canada, the United States, the United Kingdom, and Demark.

From a production perspective, Inland designs and manufactures airport wastewater collection vehicles and other components, and products used for airport environmental services such as fluid recycling. This fabrication process uses a combination of raw materials and components sourced from numerous suppliers. Most of the manufacturing materials come from Canada,

Taiwan, and Mexico. Manufacturing occurs in Canada, with the majority of products manufactured consumed internally.

For a detailed description of Inland's business activities, please refer to our comprehensive website at www.inlandgroup.aero.

### 4. Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

As set out in this report, Inland's approach to preventing and reducing the risks of forced labour and child labour in our activities and supply chain in this reporting year included:

- Implementing our Sustainability Policy, Sustainable Procurement Policy, and Policy on Child Labour, Forced Labour, and Human Trafficking
- Engaging with our suppliers through our vendor/contractor sustainability survey,
- Establishing executive-level responsibilities
- Identifying potential risks in our supply chain based on publicly available information
- Providing training to senior management

#### 5. Policies

Inland has several policies that in combination support the prevention of forced labour and child labour, including our *Sustainability Policy, Sustainable Procurement Policy, and Policy on Child Labour, Forced Labour, and Human Trafficking*. These policies outline Inland's commitment to integrating human rights measures into business activities, including in social and environmental management, health and safety, supply chain, security, and human resources.

Inland has implemented a vendor/supplier sustainability survey to collect sustainability data on our supply chain, and to communicate our sustainability priorities and expectations.

## 6. Due Diligence Processes

Inland's due diligence processes involves embedding responsible business conduct into governance structure, policies, and risk management systems. Inland proactively engages suppliers through the use of a vendor/contractor sustainability survey, which is distributed, collected, and reviewed to communicate expectations of suppliers and to inform sustainability risk management. The survey is distributed to all new suppliers (starting summer of 2023) with the objective of working back through existing tier 1 suppliers over time.

Inland has comprehensive, ongoing, oversight over its own operations (operations are not outsourced), enabling it to effectively guard against slavery human rights risks in the provision of services.

To ensure strong corporate sustainability governance, Inland has established clear executive-level responsibilities and mechanisms for overseeing the prevention and mitigation of forced labour

and child labour in operations and supply chains. This structure includes executive-level sustainability responsibilities and an Executive Sustainability Committee.

#### 7. Forced Labour and Child Labour Risk

Inland uses a risk-based approach to identify and mitigate risk associated with supply chain, including the consideration of factors such as product category and supplier location. Location risks are determined using resources such as *The United States Department of Labor* list of goods produced by child labor or forced labor (Bureau of International Labor Affairs), and the *Walk Free* organization's list of states that are at-risk of engaging in modern slavery (<a href="https://www.walkfree.org">www.walkfree.org</a>).

Inland does not subcontract its operations, and therefore has not identified risks of forced or child labour in its operations. Inland does purchase goods produced in countries with known modern slavery risks such as China. Greater risk potential exists in the following categories of goods:

- steel manufacturing supplies
- electronic components
- information technology products
- personal protective equipment, uniforms, and clothing

Given the pervasive and often hidden nature of modern slavery, however, Inland acknowledges that we must continue our vigilance to identify and target any potential human rights risk in our supply chain.

### 8. Remediation Measures and Remediation of Loss of Income

Inland has not implemented any remediation measures nor implemented any remediation of loss of income measures.

### 9. Employee Training

Inland has delivered leadership awareness training on environment, social, and governance (ESG) and has senior management awareness training on sustainable procurement and modern slavery risks specifically (including reference to *The Fighting Against Forced Labour and Child Labour in Supply Chains Act* and similar legislation). This training is also available to all employees through Inland's internal intranet.

### 10. Assessing Effectiveness

Inland is committed to continually reviewing and improving the effectiveness of our efforts to reduce the risks of forced or child labour in its business activity and supply chain.

# 11. Approval and Attestation

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 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.

**Matthew Bragg** 

Director

I have the authority to bind Inland Technologies Canada Incorporated.

Dated: May 27, 2024