

This Statement of Forced Labour in Canadian Supply Chains is made in accordance with the requirements of the Act, and in particular it is pursuant to section 11, for the financial year ending September 30, 2023 for the group of companies consisting of the parent company, Nor-Alta Aviation Leasing Inc., and the subsidiary companies, Can-West Corporate Air Charters Ltd., and Alberta Central Airways Ltd.

For the purposes of the Joint Report of the Statement of Forced Labour in Canadian Supply Chains, the companies may be referred to by the reporting entity, Nor-Alta Aviation Leasing Inc. (Nor-Alta Group).

The Business Numbers for the Group are as follows:

Nor-Alta Aviation Leasing Inc.: 84868 4544
Can-West Corporate Air Charters: 10488 6056
Alberta Central Airways Ltd.: 10011 1418

Nor-Alta Aviation has no other reporting obligations in other jurisdictions, as the Nor-Alta Group is based in and primarily operates in Alberta, Canada.

The sector / industry of the Nor-Alta Group is non-scheduled aviation services (NAICS code: 481214), providing medevac, freight transportation, and corporate air charter services within Western Canada, primarily in Alberta.

# a) Structure, activities and supply chains

# Structure

Nor-Alta Aviation Leasing is the holding (parent) company. Can-West Corporate Air Charters and Alberta Central Airways are the operating (subsidiary) companies. The parent company owns and leases the aircraft to the subsidiaries. The subsidiaries provide various non-scheduled aircraft services including medevac, freight transportation, and corporate charter services, primarily within the province of Alberta.

## Activity

The Nor-Alta Group is largely a serviced-based entity, as it transports patients, charter guests, and cargo via aircraft. Due to the nature of the industry, there is no production, manufacturing, growing, extracting, processing, sale, or distribution of goods, both inside and outside of Canada.

All 3 companies within the Nor-Alta Group are privately owned corporations. All employees are employed within Alberta, Canada, and there are approximately 120 employees within the Nor-Alta Group. There are no concerns with forced labour or child labour directly within the Nor-Alta Group, as all potential employees apply for employment, and if acceptable, are then provided with a Job Offer in response to the application. If the Job Offer is signed and returned by the potential employee to the Nor-Alta Group, then the potential employee is permitted to gain employment for the Nor-Alta Group.

## Supply Chain

The supply chain for Nor-Alta, Can-West, and Alberta Central (the Nor-Alta Group) is limited, as there are no goods purchased for retail / resale purposes. The purchases of the Nor-Alta Group primarily consist of aircraft, aircraft parts, and fuel.

The importation of goods consists of aircraft parts and aircraft, primarily from vendors located in the United States. All vendors utilized must be on the approved vendor list. Vendor audits are performed to ensure that all parts come from reputable sources. No 3<sup>rd</sup> party vendors are used, as all parts come directly from the source of manufacturing or assembly. These processes are completed to ensure that there is no acquisition of simulated/counterfeit parts. Aircraft parts are not resold, they are purchased to service the Nor-Alta Group fleet of aircraft. All aircraft parts have identifiable aircraft part numbers that are tracked. If a part cannot be identified with a tracking part number accompanied by an approved purchase order from an approved vendor, then it cannot be installed on to our aircraft. These procedures outlined in our internal Quality Management System, that is regularly reviewed by senior management and executives.



#### b) Policies and due diligence processes

The Nor-Alta Group is currently in-progress of implementing procedures and policies to ensure that we are performing our due diligence to mitigate the risk of forced labour and child labour within our supply chain. It is a value within the Nor-Alta Group to ensure that we integrate a culture of human rights initiatives and challenge ourselves to be fiduciary stewards within our communities and greater populace.

The Group has an approved Vendor list, and we are only able to purchase goods from these vendors. We utilize contracts with our major vendors, and we are in the process of adding disclosures to the vendor contracts so that vendors are aware that we are conscientious of ensuring that our supply chain is free from child labour and forced labour.

Vendors may be required to perform self-audits to meet our Quality Management System requirements. We provide the vendors with the mandated checklist and disclosures that they are required to fulfill prior to them being an approved vendor. The S211 disclosures will be included in our Vendor Audit section of the Quality Management System, which will require vendors to disclose any information or processes that they have in accordance with Section 11 efforts related to Forced Labour and Child Labour prevention in the Supply Chain. Per our Quality Management System, if the vendors do not meet the audit criteria, then they are removed from the approved vendor list, and will require a subsequent audit to be reinstated as an approved vendor.

# c) Forced labour and child labour risks

In the normal course of business, we pay attention to those vendors located in sensitive high-risk areas or in service categories which may expose us to a higher potential risk of child labour or forced labour. In our industry, the only concern would be where aircraft parts are manufactured, as they may come from higher risk areas. From our internal perspective, our existing vendor relationships and the nature and location of the services provided do not indicate risk of modern slavery in our supply chain.

#### d) Remediation measures

At this point of time, the Nor-Alta Group has not identified concerns of forced labour or child labour, thus, no remediation measures have been taken.

# e) Remediation of loss of income

The Nor-Alta Group has 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, since no illegal labour has been identified.

# f) Training

Senior level management and executive staff are the only staff members who training would apply to. At this point of time, no training has been done with staff. In the future, we intend to implement procedures in our Quality Management System disclosing the risk of illegal labour, and that it is mandatory for management staff that are involved with the ordering and purchasing of parts to follow the guidelines to ensure that approved vendors are used to mitigate the risk of illegal labour.

## g) Assessing effectiveness

Currently, no steps have been taken to assess the effectiveness in preventing and reducing risk of forced labour and child labour in our supply chains.



# **Board Approval**

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.

Abe Neufeld CEO, Accountable Executive May 30, 2024

I have the authority to bind Nor-Alta Aviation Leasing Inc.