



# Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 Annual Report

## 1.0 Introduction

This Report is made by Shock Trauma Air Rescue Service (“STARS”) for the fiscal year ended March 31, 2024 (“Reporting Period”) and provides the steps taken by STARS to prevent and reduce the risk that forced labour or child labour is used in the production of goods imported into Canada by STARS.

## 2.0 STARS’ structure and activities

STARS is an air ambulance organization, established in 1985. STARS is a federal corporation under the Canada Not-for-profit Corporations Act and is a non-taxable registered charity pursuant to Section 149 of the Income Tax Act (Canada).

STARS provides time sensitive medical intervention and/or emergency transport services to patients with an acute, life or limb threatening illness or injury. STARS operates a fleet of ten (10) Airbus H145 helicopters, air medical crew and transport physicians, and a dedicated emergency dispatch centre from bases in Calgary, Edmonton, Grande Prairie, Saskatoon, Regina and Winnipeg.

## 3.0 STARS’ supply chain

STARS works with international suppliers predominantly from the United States and Europe to procure medical equipment and parts and supplies for its helicopters. Given the highly regulated nature of Aviation and Medical operations, STARS must normally select from a limited pool of vendors pre-certified by its aircraft manufacturers. During the Reporting Period, STARS procured goods valued at \$1.1 million CAD from international suppliers. STARS has four (4) key suppliers from whom it purchased goods valued at \$20,000 CAD or more during the Reporting Period. STARS understands that some of these goods may have been sourced from upstream suppliers. STARS endeavours to understand its vendors’ upstream suppliers where possible.

## 4.0 STARS’ policies and due diligence processes in relation to forced labour and child labour

### 4.1 STARS policies

#### Code of Conduct

STARS’ Code of Conduct sets out the expected behaviour of its employees, contractors, volunteers and Directors.

#### Ethics and Integrity Reporting Policy

STARS’ Ethics and Integrity Reporting Policy provides a mechanism for the confidential submission of concerns related to violations and unethical conduct.

### 4.2 STARS’ Due Diligence Processes in relation to forced labour and child labour

- STARS reviewed multiple information sources that identify regions and industries associated with Forced Labour and Child Labour, including Global Estimates of Modern Slavery; Forced Labour and Forced Marriage;<sup>1</sup> Uyghur Forced Labor Prevention Act;<sup>2</sup> and United Nations Guiding Principles on Business and Human Rights and Combating Forced Labour, A Handbook for Employers & Business.<sup>3</sup>
- STARS completed a risk assessment focused on its key suppliers, based on total international spend, that included a review of available compliance statements. The risk assessment indicated that STARS’ purchased goods were from low-risk jurisdictions.

## 5.0 Risks of forced labour and child labour in STARS’ operations and supply chains

### 5.1 Operations

STARS considers the risk of forced labour occurring within its operations to be negligible because:

- All STARS’ operations are located in Canada. jurisdictions in which it operates.
- Employee compensation is competitive with market.



403-295-1811



1441 Aviation Park NE, Box 570  
Calgary, AB T2E 8M7



info@stars.ca | stars.ca

- All STARS' employees are located in Canada and employed in accordance with the Federal and Provincial laws of the

### 5.2 Supply Chain

STARS works with a limited number of key suppliers who, based on its due diligence, hold Human Rights standards in high regard and have appropriately managed the risk of forced labour and child labour.

### 6.0 Remediation of forced and child labour and loss of income

STARS due diligence did not identify forced labour or child labour in its supply chain. As a result, there were no measures taken to remediate the loss of income to the most vulnerable families.

### 7.0 Training provided to employees on forced labour and child labour

The limited number of employees that purchase goods internationally for STARS are aware of the risks associated with forced labour and child labour. STARS has not provided any training specifically related to forced labour and child labour to its broader workforce.

### 8.0 Assessing Effectiveness

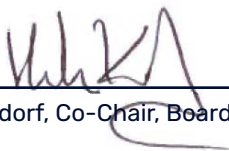
STARS has assessed the risk of forced labour and child labour in its operations and supply chain as low. STARS will continue to monitor, assess, and remediate, if required, the risk of forced labour and child labour in its operations and supply chain.

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## Approval and Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"), and in particular section 11 thereof, we, the undersigned, attest that we have reviewed the information contained in this report for Shock Trauma Air Rescue Service. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

We have the authority to bind Shock Trauma Air Rescue Service.



Helen Kasdorf, Co-Chair, Board of Directors



Curtis Stange, Co-Chair, Board of Directors

May 2, 2024

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<sup>1</sup>International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), Geneva, 2022 ISBN: 978-92-2-037483-2 (web PDF)

<sup>2</sup>US Government Public Law 117 - 78 - An act to ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States market, and for other purposes.

<sup>3</sup>Combating forced labour: a handbook for employers and business / International Labour Office -- 2nd ed. - Geneva: ILO, 2015

