

# Modern Slavery Report 2024





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## Reporting Entities Covered by this Report

This Report is submitted on behalf of Skyservice Investments Inc., Sky Service F.B.O. Inc. and Skyservice Business Aviation Inc., in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("Act"). Skyservice Investments Inc, Sky Service F.B.O. Inc. and Skyservice Business Aviation Inc. are companies incorporated in Ontario, Canada and operating in Canada. Together, Skyservice Investments Inc., Skyservice Business Aviation Inc. and Sky Service F.B.O. Inc. shall be collectively referred to as "Skyservice".

This Report was approved by the Board of Directors of Skyservice on May 31, 2024 .

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 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.

Signature:



Full name: Benjamin Murray

Title: President & CEO

Date: May 31, 2024

I have the authority to bind Skyservice Investments Inc, Skyservice Business Aviation Inc. and Sky Service F.B.O. Inc.

## Introduction

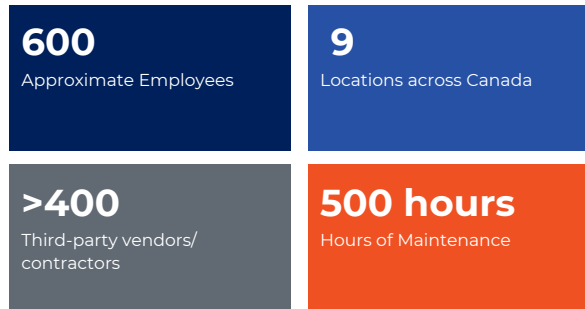
At Skyservice, our commitment to corporate and social governance initiatives are not only a priority, but our way of doing business. From our board of directors and the executive management team to our staff at each of our locations, we collectively strive to be better corporate citizens.

Since our founding in 1986, we have been firmly committed to making a difference in our world through equitable operations, strategic charitable investment, and environmentally friendly initiatives. Today, that commitment takes on new meaning as we measure, manage, and enhance our impact in line with international best practices, including those implemented to prevent the use of forced labour and/or child labour (collectively referred to herein as “modern slavery”).

Below is a snapshot of the steps Skyservice has initiated to reduce the risks of modern slavery in its business and supply chains up to and including Q1 of 2024, as well as what we expect is still to come before May 31, 2025:

Prior to March 31, 2024	Still to Come
We took the following steps to address modern slavery risk:	Before May 31, 2025, we will focus on the following:
<ul style="list-style-type: none"> <li>• Mapping of Skyservice’s activities and supply chains.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to identify and assess risks of modern slavery in Skyservice’s activities and supply chains.</li> </ul>
<ul style="list-style-type: none"> <li>• Conducted an internal assessment of risks of modern slavery in Skyservice’s activities and supply chains.</li> </ul>	<ul style="list-style-type: none"> <li>• Roll out mandatory anti-modern slavery training to all employees.</li> </ul>
<ul style="list-style-type: none"> <li>• Preliminary risk assessment of Skyservice activities and supply chains.</li> </ul>	<ul style="list-style-type: none"> <li>• Revise “Know Your Client” onboarding process for suppliers and material business clients.</li> </ul>
<ul style="list-style-type: none"> <li>• Developed an initial plan for addressing possible modern slavery risks.</li> </ul>	<ul style="list-style-type: none"> <li>• Embed anti-modern slavery considerations in Ethics/Code of Conduct documents.</li> </ul>
<ul style="list-style-type: none"> <li>• Reviewed recruitment processes and internal controls to confirm all workers are recruited voluntarily.</li> </ul>	<ul style="list-style-type: none"> <li>• Enhance Skyservice policies and processes to address modern slavery.</li> </ul>
<ul style="list-style-type: none"> <li>• Began contacting suppliers to have them acknowledge and declare their compliance with the Act and that they have not identified modern slavery in their operations or supply chains.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop grievance and reporting mechanisms for modern slavery for Skyservice employees and clients/business partners</li> </ul>

## Skyservice’s Structure, Activities and Supply Chains



Skyservice is a best-in-class, trusted source with 37 years of experience serving the North American business aviation market. Through our aircraft management, charter, maintenance, repair and overhaul services, and fixed bases of operations (“FBOs”) we offer a full spectrum of services tailored to help aircraft owners traverse the often-complex stages and regulatory requirements of aircraft ownership and operation.

Skyservice has 9 locations in Canada. We receive and welcome guests at our award-winning FBOs, with premium lounges, thoughtful amenities, and 24/7 concierge services. These FBOs also support Skyservice aircraft management, charter services, and maintenance programs.

### Supply Chains

Skyservice enters into contractual relationships with third-party vendors and suppliers. The majority of these vendors and suppliers are on the maintenance side of Skyservice’s business and include a variety of aviation supplies from third-party vendors, from aircraft parts to maintenance equipment to fuel to other fluid materials. On the aircraft management and charter services side of Skyservice’s business, it may include catering items and customer product items.

## Skyservice's Business and Supply Chains that Carry Risk

Skyservice recognizes that forced labour, child labour and human trafficking pose serious and prevalent global human rights issues. Skyservice categorically stands against any kind of human exploitation and human rights abuses. In accordance with these fundamental principles and the Act, over the last year, Skyservice has begun identifying and assessing the risks of modern slavery in our operations and supply chains. This work will continue over the next reporting year, informing our approach to formalize protocols and processes to manage any risks of modern slavery in Skyservice's business operations and supply chains.

### Risks of Modern Slavery in Skyservice's Business

In any business, there is a risk of causing or contributing to modern slavery through the use of labour, especially in vulnerable populations and in high-risk locations. Skyservice has considered the location of our employees, the type of work performed at each location and our hiring processes. Our determination is that the risks of modern slavery in Skyservice's business is low for the following reasons.

While Skyservice manages and operates aircraft that fly internationally, our employees are based primarily at Skyservice's FBOs, which are limited to Canada and the US, low-risk jurisdictions for modern slavery. To that end, per our hiring practices, all Skyservice employees are either Canadian or US citizens or permanent residents, who are the age of majority or older.

Furthermore, the work carried out in the course of Skyservice's business is extremely complex and specialized. It requires that many of our employees be highly trained in technical fields and have experience in the aviation industry. Many of the employees hired by Skyservice require specific certifications and/or licenses pursuant to federal regulations. As a result, the hiring process for Skyservice's employees is discerning, making the likelihood of labour through modern slavery low.

### Risks of Modern Slavery in Skyservice's Supply Chains

Skyservice successfully operates a business aviation company, with both aircraft operation and aircraft maintenance lines of business. As detailed above, supporting these lines of business requires sourcing parts, equipment and supplies from a number of third-party vendors. Skyservice recognizes that there is a possibility that modern

slavery may be present in the supply chains for these third-party vendors.

Accordingly, Skyservice has considered the location of suppliers and the nature of the goods and services provided to Skyservice. Our determination is that the risks of modern slavery in Skyservice's supply chains are low for the following reasons.

Skyservice has initiated an internal assessment of the location of its third-party vendors. Based on preliminary findings, all or almost all such vendors are located in jurisdictions that are at low-risk for modern slavery, such as North America and Europe.

When looking at the nature of the goods and services provided to Skyservice, some possible areas posing risk of modern slavery include the sources of food and beverage for catering, third-party ground crew at airports, and the raw materials and manufacture of aircraft parts (including electronics). While these areas pose more risk than other parts of Skyservice's business or supply chains, the following considerations mitigate the risk posed: (a) the location of these vendors. As mentioned above, based on our findings to date, these vendors are all or almost all located in jurisdictions that are at low-risk for modern slavery; and (b) the operation of aircraft on the ground and the manufacture of aircraft parts is complex and highly regulated by government and industry, making the use of modern slavery unlikely.



## Steps Taken to Manage Modern Slavery Risks

Skyservice has taken, or will take in the upcoming reporting year, several other steps to develop and implement an action plan to manage modern slavery risks, which are outlined below.

### Due Diligence in Our Supply Chain

Prior to March 31, 2024, Skyservice commenced an initial outreach to several of its third-party vendors. Skyservice directly contacted approximately 400 third-party vendors (approximately 70% of Skyservice's total vendors) to have each of them acknowledge and declare, amongst other things, their compliance with the Act, that they have not identified the use of modern slavery in their operations or supply chains, and that they will maintain diligence in identifying the use of modern slavery in their operations and supply chains. These suppliers have been steadily providing their acknowledgement and declaration to Skyservice. Skyservice will continue to work with these third-party vendors, as well as continue our outreach to our other third-party vendors, to collect these acknowledgements and declarations, and satisfy ourselves of their compliance with the Act and their diligence in identifying and preventing modern slavery risks in their operations and/or supply chains.

Over the next reporting year, Skyservice also plans to update its onboarding questionnaire for new Skyservice suppliers to include questions that directly address modern slavery.

### Employee Training and Policies

Skyservice has a workplace culture that emphasizes ethical conduct and safety. Employees are encouraged to report unsafe, inappropriate or suspicious activity. To support this, Skyservice has several policies and protocols, including a company-wide Anti-Harassment, Violence, Discrimination and Bullying Policy and a company-wide incident reporting system.

Over the next reporting year, we plan to update our company policies and procedures to address modern slavery. Skyservice will also roll out required anti-modern slavery training to all employees in 2024, with expected completion by all Skyservice employees by May 31, 2025. Skyservice also expects to update our Code of Conduct policy to directly address modern slavery risks

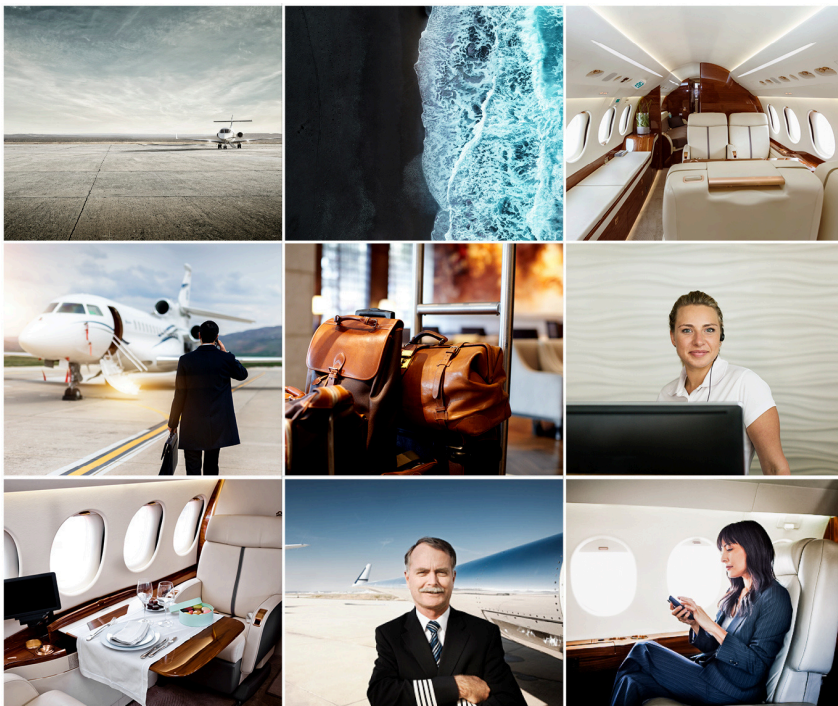
### Grievance and Reporting Mechanisms

Skyservice has a workplace culture that encourages and supports the sentiment of "if you see something, say something". Employees are strongly encouraged to report suspicious, unsafe or unethical activity through a variety of channels in place at Skyservice, including without limitation Skyservice's health and safety incident reporting system, and the reporting of human rights violations to Skyservice's Chief Human Resources Officer.

Over the next reporting year, we plan to enhance our policies to include formal mechanisms to report modern slavery incidents and concerns in Skyservice's business activities and supply chains, as well as how Skyservice would address such incidents and concerns.

## Measuring effectiveness in business operations and supply chains

Successful modern companies must be malleable and adaptable to the constant changes in today's society and economy. As a successful business aviation company that has operated for 37 years, Skyservice is constantly identifying areas of risk or change in our business that could help us be a better corporate citizen. As such, we regularly review and update our corporate governance policies, procedures and principles to better support our commitment to human rights and the law. When such policies, procedures and principles are updated, this in turn creates awareness amongst Skyservice employees of the underlying risks and concerns that necessitated the changes to our corporate policies, procedures and principles.



**Aiming  
higher.  
Reaching  
further.**



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## Measures taken by Skyservice to Remediate Modern Slavery

Skyservice has assessed that its activities and supply chains do not carry significant risk of forced labour or child labour being used. As such, it is unnecessary for Skyservice to take steps to remediate any instances of forced labour or child labour.



## Measures to remediate loss of income to the most vulnerable families from any measure taken by Skyservice

Skyservice has assessed that vulnerable families have not been impacted by loss of income as a result of steps Skyservice has taken to eliminate forced labour or child labour risks. As such, it is unnecessary for Skyservice to take steps to remediate any instances of forced labour or child labour.



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