




*Fighting Against
Forced Labour and
Child Labour In
Supply Chains Act*

2024 Modern Slavery Report

Rise Air and Snowbird Aviation Services
April 2025



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Introduction

In Canada, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the *Modern Slavery Act*) came into force on January 1, 2024. Implemented by Public Safety Canada, the Act requires annual reporting on our due diligence activities related to the prevention of forced and child labour in business operations and supply chains. Pursuant to the Modern Slavery Act this report pertains to the fiscal year ended December 31, 2024.

Transwest Air LP, operating as Rise Air and Snowbird Aviation Services (collectively, the “Reporting Entities,” “Company,” “we” or “us”) is committed to operating in compliance with all applicable Canadian laws and regulations and in a socially responsible and sustainable manner. Our goal is to partner with customers, suppliers, and vendors with values and commitments that align to the same.

Corporate Structure, Activities and Supply Chains

Our Organization

Certified by the Canadian Council of Indigenous Business, Rise Air is the largest Indigenous-owned airline in Western Canada, supporting the long-term economic development of the 16 northern Saskatchewan Dené and Cree communities that have ownership in Athabasca Basin Development (ABD) and Prince Albert Development Corporation (PADC). Day-to-day operations are led by a skilled leadership team reporting to an esteemed Board of Directors. Rise Air employs upwards of 300 people in locations spanning Saskatoon to Fond-du-Lac.

Activities

With a varied and ever-expanding fleet of fixed-wing aircraft, including wheels, floats, and skis, we are the only air operator in Saskatchewan with the capability of moving people and goods to and from virtually any location in the province and beyond.

Entering our 70th anniversary year, Rise Air also has decades of experience providing contract charter flights, including mine personnel shift changes and provincial court party transportation. Numerous accredited maintenance bases across the province means that Medevac transportation, corporate and charter travel, and freight hauling are just a few of the many services Rise Air can provide safely, efficiently, and reliably, 365 days a year.

Airline Services Division

Snowbird Aviation Services provide ticketing, counter, ground handling, and aircraft fueling services at all our bases. Snowbird also provides aviation fueling solutions at other Saskatchewan locations.

Supply Chains

The Reporting Entities operate in the highly regulated industry that is aviation. Services sourced include those necessary for corporate needs such as financial, human resources and technology as well as aviation support services to ensure we can schedule and dispatch our air transportation services to our passengers and customers. Our procurement activities primarily revolve around securing aircraft parts and technology as well as fuel and de-icing fluid necessary to safely operate our fleet of aircraft, also sourced and purchased by the Company for use in our operation. Other goods sourced and purchased include uniforms for our

employees and a variety of ground services equipment and vehicles. We source these goods from within and outside Canada, oft dependent on manufacturer specifications. Further, we must ensure our maintenance facilities and office spaces are conducive to the activities carried out in clean, well-ventilated, secure and safe environments. Many of our suppliers and vendors must adhere to the same aviation standards and certifications and are bound by the same or similar Modern Slavery commitments. All suppliers and contractors are expected to recognize and comply with Rise Air's policy on Principles for Procurement [Appendix A].

Policies and Due Diligence

In 2024 we developed our initial policy related to the pursuit of the elimination of forced labour and child labour within our supply chains. Since development we have learned more and have determined a review and revision of the policy is warranted to further meet the objectives of the *Modern Slavery Act*. This review and revision will occur in 2025.

2024 saw the education and training of our leadership team and Board of Directors on the overall Act and our specific role, responsibilities and commitment within it.

Work has begun and continues in relation to:

- Embed responsible business conduct into policies and management systems
- Identify and assess adverse impacts on operations, supply chains and business relationships
- Cease, prevent or mitigate adverse impacts
- Track our implementation and results
- Communicate how the impacts are addressed
- Provide or cooperate in remediation where appropriate

Forced Labour and Child Labour Risks

The risk of modern slavery within Rise Air, Snowbird Aviation Services, and its supply chain is assessed by the Board's Human Resources, Governance and Risk Committee which meets quarterly. Risks typically fall into three categories:

1. Practices that are abusive. These are situations where it is identified that modern slavery, or a high risk of modern slavery, is occurring.
2. Policies that are abusive. For example, a policy that requires workers to work hours above the federally prescribed maximum amount.
3. Policies and practices that create the potential for modern slavery. An example of this is the withholding of workers' passports, which limits the ability of individuals to freely leave a job.

In our initial stages of identifying parts of our activities and supply chains that carry the risk that forced labour or child labour is used, we have determined that our own operational activities at Rise Air and Snowbird Aviation Services pose low to no risk. Operating entirely within Canada's borders and predominantly in Saskatchewan we hire and employ our workforce by adhering to the Canada Labour Code. This in itself eliminates most inherent risk and further upholding the high standards of our internal recruitment and hiring practices which includes background checks, confirmation of a person's resident status and their ability to legally work in Canada further mitigates risk. We confirm our compliance with the

Canadian Human Rights Act and the Canadian Charter of Rights and Freedoms. All employees are expected to recognize and comply with the Company's Principles of Conduct [Appendix B].

Where we identify potential risk is within our international supply chains, both direct and indirect. As noted, such risk does not mean forced labour or child labour exists, but rather there is the potential. While the majority of our significant suppliers would also be subject to modern slavery legislation and / or regulation, we have initially assessed potential risk as we have yet to establish formal declaration and attestation of our suppliers and vendors to acknowledge their own commitment to producing goods free of forced or child labour. Further mitigating potential risk is the fact the majority of suppliers of the goods used in our operation are part of the highly regulated and sophisticated supply chains that are Aerospace and Aviation. Regardless, identifying and ceasing / preventing / mitigating the potential of such risk is an on-going area of discussion and implementation that will continue in 2025.

Remediation Measures

Not applicable. We have not identified any forced labour or child labour in our activities or supply chains.

Remediation of Loss of Income

Not applicable. We have 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 or supply chains.

Training

In 2024 we educated and trained our leadership team and Board of Directors on the *Modern Slavery Act* including what forced labour and child labour are and what our responsibilities are to identify, eliminate or mitigate instances from our activities and supply chains. This training was provided in-person by in-house executive team members and lasted approximately 30 minutes as part of our standing weekly Senior Leadership Team meeting and a quarterly Board of Directors meeting.

Development and implementation of training of specific employees with procurement and / or finance responsibilities is ongoing. This training will focus on the Company's collaboration with suppliers to ensure that our expectations in respect to modern slavery are fully understood and the exposure to human rights risks is minimized.

Effectiveness

In 2024 we did not take specific actions to assess our effectiveness in preventing and reducing risks of forced labour and child labour.

Approval and Attestation

This report was approved by the Company's Board of Directors on April 16, 2025, pursuant to paragraph 11(4)(b)(ii) of the *Modern Slavery Act*.

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 reporting entities herein. 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 have the legal authority to bind Transwest Airway LP, operating as Rise Air and Snowbird Aviation Services.

Full name: Derek Nice

Stephen Smith

Title: President and Chief Executive Officer

Chair, Rise Air Board of Directors

Date: April 30, 2025

Signature:



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Full name: Derek Nice

Stephen Smith

Title: President and Chief Executive Officer

Chair, Rise Air Board of Directors

Date: April 30, 2025

Signature: _____



Appendices

Appendix A – Principles of Procurement

Appendix B – Principles of Conduct

Principles for Procurement

Introduction

Rise Air recognizes that every purchase can be leveraged to create economic, environmental and social impacts. The purpose of this policy is to ensure Rise Air's procurement practices are open, fair and transparent and contribute to building and maintaining a healthy, prosperous and climate-resilient community.

Scope

This policy applies to all purchasing of goods and services at Rise Air and Snowbird Aviation Services, including the procurement of services provided by consultants and contractors/subcontractors.

Guiding Principles

The following principles for purchasing activities undertaken by Rise Air will be utilized:

- **Accessibility.** Rise Air supports the federal government's social and economic objectives by ensuring where possible the goods and services we purchase are accessible by design, so that all individuals with disabilities can use them without adaptation.¹
- **Ethical Standards.** Rise Air expects consultants, suppliers and contractors/subcontractors to adhere to ethical business practices. These ethical standards are inclusive of the minimum standards in provincial and federal legislation related to labour standards, employee treatment, wages and benefits, working conditions, and ethics standards. All suppliers entering into a procurement agreement with Rise Air will agree to the terms of the company's code of conduct as may be amended by Rise Air from time to time.
- **Environmental Sustainability.** Rise Air integrates environmental sustainability requirements into purchasing decisions and supply chain management processes to support our goal of achieving carbon net zero by 2050, through reduced emissions, reduced pollution, greater energy efficiency and waste reduction.
- **Indigenous Procurement.** Rise Air's procurement policies create positive pathways for Indigenous businesses and the Indigenous community at-large by reducing barriers that limit participation of Indigenous-owned businesses.
- **Social Value Considerations.** Rise Air considers social value when making purchasing decisions, provided such social value considerations are consistent with the Company's

obligations under applicable contracts and/or agreements. We value positive social impact outcomes related to employment, training and skills development, social value supply chain, and community development.

¹ *The procurement of goods, services and facilities can include purchasing equipment, e.g., lifts, wheelchairs, or aircrafts and rail cars; putting contracts or arrangements in place for the provision of services, e.g., ground staff who package, load and unload mobility aids; ground transportation service providers, such as taxi and bus drivers, who provide service to and from terminals; and for specifications and requirements related to newly built or renovated terminals and any related facilities.*

Rise Air is expected to include accessibility as a key criteria during the procurement process when evaluating goods and services that will be used by, or to assist, persons with disabilities.

Rise Air will:

- *Develop and implement a procurement plan by 2024 that includes accessibility as a criteria or a requirement for proposals of goods, services, and facilities.*
- *Consult persons with disabilities prior to investing in new purchases to evaluate accessibility from the perspective of a person with a disability.*

Employee Acceptance of the Principles of Conduct

A code of conduct is established for employees that outlines the rules of expected behaviour to prevent noncompliance with all applicable laws, rules and regulations, conflict of interest, inappropriate acceptance of gifts, improper advantage, unfair competition, inappropriate use of company property, and information and responsibility to report violations or suspected violations in accordance with operational policy.

Principles guide the creation of and support for a positive and progressive organizational culture and the professional conduct of all employees. Related processes are designed to effectively manage employee relations and employee conduct including conflict of interest and confidentiality to protect the legitimacy, integrity, trust and credibility of Rise Air and its employees in the exercise of their delegated authorities and performance of their administrative duties.

Roles and Responsibilities

Employees are responsible for:

- Understanding the principles of conduct and acting in accordance with the principles.
- Contributing to a positive workplace culture.
- Managing their personal conduct and conflicts of interest appropriately.
- Maintaining the confidentiality of privileged or personal information.

Executive, senior leadership and managers and supervisors are responsible for encouraging a positive workplace culture, monitoring effectiveness of the work unit and teams, practicing thoughtful and accountable employee relations.

Human Resources is responsible for communicating with staff to:

- Encourage employee engagement.
- Manage the employee recognition program.
- Review, investigate, and act on the self-disclosure and reporting of any breaches of conduct.

Values

Our reputation is one of our most valuable assets and is crucial to our success. We hold ourselves to standards of behaviour that stand up to regulatory and public scrutiny. We all share this responsibility. These are the values that guide our actions:

Safety. Safety is core. Above all, we are safe.

Service. We care for each other, and we care for our customers.

Integrity. We are ethical. We are professional. We do what we know to be right. We are loyal to each other, to our communities, and to our customers.

Sustainability. We strive for long-term success. We grow by respecting the environment, generating returns for our shareholders, reinvesting in our fleet, and developing people.

Passion. We are passionate about our work. We do what we love, and we enjoy what we do.

Principles of Conduct

1. A higher standard of ethical behaviour is expected of a company entrusted with public safety. Rise Air employees maintain a high standard of ethical, moral, and legal conduct, including the professional responsibility to act with due diligence, loyalty, and care.
2. All employees are representatives of Rise Air.
3. All employees will contribute to a culture of safety, welcome, respect, learning, professional integrity, transparency, openness, empowerment, accountability, productivity, independence, respect, and trust by:
 - Assuming responsibility for and exercising whatever measures are deemed appropriate by the executive and senior leadership to ensure excellence in administering programs, services, and plans.
 - Managing their personal conduct and any conflicts of interest appropriately in accordance with the guidelines in this policy.
 - Practicing support of colleagues.
4. Executive, senior leadership, and managers and supervisors will further encourage this culture of integrity, transparency, openness, empowerment, accountability, productivity, independence, respect, and trust by:
 - Monitoring and evaluating the collective and individual participation in and effectiveness of the work of work teams and units.
 - Practicing thoughtful and accountable employee relations and administrative decision making by ensuring that:
 - Employees are provided individual and collective opportunities to be heard and informed about decisions that affect them.
 - Issues have been defined and framed appropriately.
 - Relevant facts have been sought and identified.

- Collective understanding and insight have been integrated into processes.
- Focus on identified priorities.
- Informed decision making is embedded into the process.

5. In discharging the duties and exercising the authority of their positions, all employees will:
- Act honestly and in good faith, and in accordance with applicable legislation, regulations, and policies.
 - Exercise a degree of care, skill, and diligence that a person of ordinary prudence would exercise, having regard to their skills, experience, and qualifications.
 - Employ their knowledge or skill they possess or ought to possess because of their profession or position, to all relevant circumstances in the administration of services, programs, and plans.
 - In carrying out their job duties, put the interests of the Company ahead of their own or that of any other office or position they may hold or organization of which they may be a member.
 - Represent and act in the best interests of Rise Air.
6. Employees will support, nurture and model conduct that embodies equity and inclusion, respectful relationships, and professionalism by:
- Demonstrating a keen sense of mutual obligation and respect to those they serve and with whom they work.
 - Respecting leadership and responsibility for decision making within the Company’s organizational structure.
 - Maintaining confidentiality of privileged information necessary to carry out their duties and avoiding any actual or perceived conflicts of interest.
 - Avoiding any undue influence from any individual or group within or outside the company.
 - Welcoming and cultivating different expertise, points of view and constructive criticisms.
 - Seeking to clarify, understand and respect the distinct roles and responsibilities of the executive leadership team, the board, committees, and administration.
 - Taking responsibility to bring issues and solutions to the attention of others through appropriate avenues.
 - Self-managing and self-regulating.

Declaration

- a) I have read and understand the Principles of Conduct.
- b) I agree to comply with all its terms and conduct myself in accordance with these principles and Company values.
- c) I have complied since my last declaration.

Signature

Date