Unifi Aviation Canada Report on Supply Chain

Introduction

This report has been prepared by Unifi Aviation Canada, Inc. in accordance with Section 11 of Bill S-211 for the financial year ending December 31, 2024. Unifi Aviation Canada qualifies as a Reporting Entity under the Act, having a place of business in Canada, conducting business activities within Canada, and meeting the specified Entity employee count and asset thresholds.

While there have been no historical indications of modern slavery risks within our operations and supply chain, we acknowledge the global imperative to eliminate child labour and forced labour. In accordance with Section 11 of Bill S-211, this report outlines the measures Unifi Aviation Canada has implemented to identify potential modern slavery risks and highlights our efforts to strengthen prevention mechanisms in the future.

Section A: Structure, Activities and Supply Chains

Unifi Aviation Canada is a leader in delivering aviation services to airlines and airports. The scope of our services includes, but is not limited to:

- Aircraft Services: Cabin cleaning, fueling, ramp handling, cargo handling, catering provisioning
- Passenger Services: Passenger check-in, wheelchair services, queue management, lobby management, baggage handling, customer service
- Security: Access control, perimeter guarding, cargo screening, CCTV monitoring, concierge services, temperature checks
- Transportation: Employee shuttle services
- Airport Services: Custodial services, guard services, landscaping, property inspection

Unifi Aviation Canada is dedicated to upholding a responsible supply chain, adhering to strict safety protocols, ethical sourcing of materials, and promoting environmental sustainability. All our procurement is exclusively handled through suppliers located in Canada and the US. Our commitment includes partnering with suppliers who maintain fair labour standards, comply with all regulatory guidelines, and utilize green technologies. Additionally, Unifi Aviation Canada values transparency and strives to cultivate enduring, cooperative relationships with all suppliers. By adhering to these core principles, Unifi Aviation Canada enhances safety, minimizes environmental impacts, and earns the trust of our customers and stakeholders.

Section B: Policies and Due Diligence Processes

To date, Unifi Aviation Canada has detected no instances of child labour or forced labour within our operations or supply chains. We uphold a firm commitment to operating in complete accordance with all applicable laws and regulations. Given that our suppliers are located solely in Canada and the US, regions known for their fair labour laws and standards, we have evaluated the risk of modern slavery in our activities and supply chain as low. Consequently, we have not developed specific policies or due diligence processes focused on child labour and forced labour over the past fiscal year. Nonetheless, we acknowledge the significance of sustaining ethical and responsible business practices. We remain alert

and are prepared to modify our policies and procedures should there be any significant changes in our risk profile in the future, particularly concerning our procurement portfolio.

Looking ahead, we continue to assess the need to plan and implement a comprehensive supplier code of conduct. This code will ensure that all suppliers adhere to our ethical standards and comply with applicable laws and regulations. We intend to distribute this document to all suppliers once it has been finalized and approved.

Section C: Forced Labour and Child Labour Risks

In May of 2024, we initiated a process to assess potential risk areas within our supply chain that might involve forced or child labour. This assessment utilized insights from the Walk Free Global Slavery Index and the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour. Our analysis did not identify any instances or risks of such labor issues within our procurement supply chain.

It is essential to note that the results of this risk identification effort do not indicate the actual presence of forced or child labour within our operations or supply chain. Instead, the objective of this assessment is to anticipate potential situations where such risks might arise, enabling us to develop and implement proactive prevention strategies. We acknowledge that no industry is entirely free from the risks of forced and child labour, especially in supply chain segments operating in areas with less stringent regulatory environments and enforcement.

Our risk analysis included a geographic evaluation based on the Walk Free Global Slavery Index, pinpointing regions at increased risk of forced and child labour practices. This geographic focus was combined with an analysis of at-risk goods categories, enhancing our overall risk assessment approach.

Our findings suggest that the risk of forced or child labour within our supply chain is low, as all our suppliers are located in Canada and the US, countries recognized for low prevalence of forced and child labour.

Despite this low risk, we are committed to ongoing vigilance and evolving our risk management practices and policies. The low risk does not diminish our determination to effectively manage and mitigate potential risks in the future.

Section D: Remediation Measures

To date, we have not uncovered any cases of forced or child labour within our operations or supply chains, and therefore, no corrective actions have been necessary. Nonetheless, we understand the critical need for well-prepared remediation strategies should such issues be detected in the future. We are presently considering the development of a response plan that may incorporate the following actions:

- Immediate Action and Remediation: In the event that any instances of forced or child labour are discovered within our operations or those of our suppliers, we will act immediately. Our initial steps will involve direct engagement with the affected individuals and communities to assess the impact and formulate suitable remediation strategies.
- Engagement with Suppliers: Acknowledging the complexities inherent to supply chains, we are dedicated to collaborating with our suppliers to ensure that remediation measures are successfully implemented. This may involve offering guidance, educational resources, and other support to our suppliers.

- Stakeholder Communication: Consistent with our commitment to transparency and accountability, we will keep stakeholders informed about our remediation actions and their results, while adhering to necessary privacy and confidentiality standards.

Section E: Remediation of Loss of Income

Although Unifi Aviation Canada has not encountered instances of child or forced labour within its operations or supply chains, thus eliminating the need for remediation measures for the loss of income, the importance of readiness for effective intervention in the future is acknowledged. To this end, we are enhancing our initial response protocols as described in Section D. Should our efforts to eliminate forced or child labour inadvertently impact the income of vulnerable families, we commit to implementing robust remediation measures. Our strategy emphasizes engagement over withdrawal, underscoring our dedication to using our influence for positive change.

Section F: Training

In the previous financial year, we did not conduct specific training on forced or child labour, reflecting our assessment that the risks of modern slavery are minimal in our operations. Nonetheless, we remain alert and are prepared to adjust our employee training programs as needed should our risk profile evolve.

Section G: Assessing Effectiveness

We did not perform a formal effectiveness assessment of our prevention strategies for forced and child labour during the past financial year. However, we will continue to evaluate our risk profile. Should the risk of modern slavery increase, we are prepared to implement mechanisms to assess the effectiveness of our initiatives more formally.

Conclusion

We are steadfast in our commitment to uphold the highest standards of ethical conduct and compliance with Bill S-211. Despite assessing the risk of child labour and forced labour as low in our activities and supply chains, we remain dedicated to ongoing monitoring of these risks. We will adapt our risk mitigation strategies as necessary should changes in our risk profile warrant.

Attestation

Following 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.

By: _____

Name: Andy Shin

Title: Assistant Secretary

Date: 5-31-24

I have the authority to bind Unifi Aviation Canada, Inc.