

Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act”)

INTRODUCTION

This Report constitutes The Winnipeg Airports Authority’s (“**Winnipeg Airports Authority**”, or “**WAA**”) second Report prepared under *the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“**Act**”). It covers WAA’s most recently completed financial year ending December 31, 2024 (“**Reporting Period**”). The Report outlines the steps the WAA has taken during the Reporting Period to prevent and reduce the risk that forced labour or child labour is used at any step of the import of goods in Canada or elsewhere by Winnipeg Airports Authority.

The WAA’s Board of Directors approved this report on April 24, 2025.

STEPS TAKEN IN THE PREVIOUS FINANCIAL YEAR TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

Winnipeg Airports Authority is committed to operating with responsible business practices and to ensuring that forced and child labour risks are identified, prevented, mitigated and remediated (if identified) within our organization, including applicable subsidiaries and supply chains. We are committed to responsible business practices and to treating our employees, partners, contractors, and stakeholders with respect. Further, we are committed to upholding responsible business practices that align with the United Nations Universal Declaration of Human Rights. This second report builds on last year’s report, published pursuant to the Act and explains the steps taken to prevent and reduce the risk of forced labour and child labour in our business

and throughout our supply chain.

We took the following steps during the Reporting Period to prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- included a statement in WAA policies and procedures, and specifically in our Procurement Policy & Procurement Procedure, that the WAA commits to prevent and mitigate risks of forced labour and child labour along with a reference to our Supplier Code of Conduct;
 - developed and instituted a Supplier Code of Conduct in which WAA commits to prevent and mitigate risks of forced labour and child labour along its supply chains, and which includes provisions consistent with WAA’s commitment to human rights;
 - appointed a WAA executive with oversight and overall responsibility for preventing and mitigating risks of forced labour and child labour in WAA’s operations and supply chain;
 - developed and rolled out training on preventing and mitigating risks of forced labour and child labour in WAA’s operations and supply chains for WAA employees with delegated authority to undertake procurement activities and those employees with assigned responsibilities in these matters; and
 - established a public-facing mechanism for reporting public concerns regarding WAA’s suppliers’ conduct.
- Details of the above actions are set out in this Report.

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OUR STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Winnipeg Airports Authority Inc.

WAA is a Canadian Airport Authority and is a corporation without share capital under the *Canada Not-for-profit Corporations Act*.

WAA enables the safe and seamless movement of people and goods through our airport facilities and, in doing so, contributes to connecting Manitoba to the world. We take pride in having a positive economic and social impact through our airport operations at Winnipeg Richardson International Airport (the “**Winnipeg Airport**”) and other affiliate businesses. This includes responsible land development on the airport campus, managing and operating Iqaluit International Airport (the “**Iqaluit Airport**”), and providing aviation services at other airports across the country. WAA has a total of 232 employees in Canada.

WAA’s Board of Directors is committed to transparency and governance best practices. Our Board of Directors recognizes the pivotal role that independent oversight plays in our operational integrity.

Winnipeg Airports Authority Inc. (WAA)

Incorporated under the *Canada Not-for-profit Corporations Act*, WAA is responsible for operating, maintaining and managing the Winnipeg Airport. It has multiple functional responsibilities, which collectively support the safe, secure and efficient operations of the airport.

Nunavut Airport Services Limited

Incorporated under the *Corporations Act of Manitoba*, the Iqaluit Airport, which is managed and operated by Nunavut Airport Services Limited under the WASCO umbrella, plays a critical role in connecting people and transporting goods. The single-runway airport is a hub of activity serving all two million square kilometers of the vast northern territory.

Winnipeg Airport Services Corp.

Incorporated under the *Canada Business Corporations Act*, WASCO focuses on seeking opportunities to provide aviation services and solutions not only across Canada but also globally. Its primary focus revolves around assisting other airports in operating safely and efficiently in the areas of airport management, airport operations, regulatory programs and facility management.

Airport City Winnipeg Ltd.

Incorporated under the *Corporations Act of Manitoba*, ACW coordinates and manages commercial activities to help strategically develop the Winnipeg Airport. This subsidiary focuses on real-estate development, property and facility management, and unlocking airport lands to reach their full potential. ACW also works closely with stakeholders and airport tenants to strategically expand airport operations, enhance operational efficiency and explore innovative opportunities for the future.

Business Activities

The Winnipeg Airports Authority has been operating for over 25 years in Winnipeg (Manitoba, Canada). In 1997, the Winnipeg Airport was transferred to the WAA from the federal government which created the basis for local decision-making, and which established the WAA’s oversight over the Winnipeg Airport.

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Supply Chains

WAA is committed to making responsible decisions regarding the procurement of goods and services. Through our Procurement Policy and Procedures framework, we select our suppliers with due consideration to environmental, social, economic and governance matters and strive to make objective, fair, ethical, unbiased and transparent procurement decisions. This includes public procurement for purchases over a prescribed dollar threshold, with full transparency with respect to process and evaluation criteria, in accordance with Public Accountability Principles for Canadian Airports.

The Winnipeg Airports Authority supply chain encompasses a mix of product and service procurement for internal use (not for re-sale), as follows:

Some of the broad categories of spend include:

Products	Services
Vehicles	Construction Services (Capital Projects)
Fuel and Lubricants	Contractor Services (Ongoing Maintenance)
Airfield Chemicals	SaaS (Software as a Service)
Hardware, Tools and Replacement Parts	Security Services
Mechanical and Electrical Supplies	Customer Services
Common Use Materials	Janitorial and Building Maintenance
Computer Hardware and Software	Professional Services
Safety Supplies	Financial Services

Broadly speaking, in the WAA's 2024 reporting year:

- 89% of purchases (by value) were for services;
- 98% of purchases (by value) were from Canadian Tier 1 suppliers; and
- fewer than 1% of goods (by value) were imported directly by WAA as importer of record

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POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

WAA remains committed to the highest levels of ethical conduct and integrity throughout our organization. We have incorporated principles of responsible business conduct and addressed the risks of forced labour and child labour through our Supplier Code of Conduct, Ethical Business Conduct Policy, Workplace Harassment and Violence Prevention Policy, Whistleblower Policy, Procurement Policy and Sustainable Procurement Procedure. All WAA procurement contracts require suppliers to adhere to all applicable laws, including all federal, provincial, municipal, local or other applicable laws.

The following is a description of relevant policies which support the WAA’s efforts to identify and reduce the risk of unethical or unlawful activity within WAA operations:

Supplier Code of Conduct

The Supplier Code of Conduct (the “Code”) affirms WAA’s commitment to a safe, respectful, and sustainable environment for our employees, customers and airport stakeholder organizations and outlines its expectations with respect to its suppliers. Suppliers wishing to respond to WAA public requests must acknowledge and accept the Code prior to accessing solicitation documents. Contracts with suppliers require them to confirm ongoing compliance with the Code.

Ethical Business Conduct Policy

The Ethical Business Conduct Policy outlines that WAA is committed to ensuring ethical business practices are understood, applied and integrated across the organization. The policy applies to all current full time, part-time, casual, contract, permanent and temporary employees working for the WAA. The policy details that employees must act in good faith, avoid conflicts of interest and act candidly and, equitably. Additionally, the policy describes the reporting procedures for any breach of the policy or misconduct and references the C.A.R.E system which is detailed in the Whistleblower Policy below.

Respectful Workplace and Violence Prevention Policy

WAA’s Respectful Workplace and Violence Prevention Policy is applicable to all current employees of WAA including full time, part-time, casual, contract and permanent and temporary employees. The Respectful Workplace and Violence Prevention Policy emphasizes that WAA is committed to providing a discrimination and harassment free workplace, and details that no one shall be discriminated against or harassed contrary to the *Canadian Human Rights Act* (the “**Human Rights Act**”). Further, the Respectful Workplace and Violence Prevention Policy was developed with a view to the rights and obligations under the Human Rights Act and the Occupational Health & Safety Regulations in the Canada Labour Code. It should be noted that there is no mention of child and forced labour risk mitigation in this policy.

Whistleblower Policy

WAA’s Whistleblower Policy is applicable to all WAA staff, directors, officers, committee members, contractors, suppliers, and business partners. The Whistleblower Policy articulates that WAA is committed to integrity and ethical behaviour in all aspects of its operations and to fostering a safe environment where people can express concerns without fear of retaliation. The policy also details the use of C.A.R.E., a third-party grievance reporting system that employees can use to report matters of misconduct anonymously.

Sustainable Procurement Policy and Procedure

WAA is committed to responsibly procure goods and services that result in the best value for WAA by balancing the environmental, social, economic, and governance outcomes. These policies define our commitment to being accountable and transparent to our stakeholders, including suppliers, employees, customers, and the community among other guiding principles. NASL has its own procurement policy and procedures which are substantially similar to those of the WAA.

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TRAINING AND AWARENESS

In 2024, we began rolling out mandatory awareness training modules to all leaders (i.e. managers, directors, and executives) as well as optional training for employees who are not directly involved in procurement, on child and forced labour, as well as the Supplier Code of Conduct. This training was completed in early 2025. In addition, all new employees are required to pass training modules on these topics as part of their initial orientation.

REPORTING ISSUES AND ADDRESSING POTENTIAL CONCERNS

We provide a monitored channel for reporting non-compliances with WAA’s Supplier Code of Conduct on our external facing website [Supply chain - Winnipeg Airports Authority](#). Employees, contractors, suppliers and any other person may report a concern of potential or actual misconduct through the website.

MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

To date, we have not identified instances of forced and child labour in our business and supply chains. As such, we have not had occasion to take steps to remediate any impacts associated with forced labour or child labour. Complaint mechanisms, such as WAA’s Whistleblower Policy and through WAA’s external facing Supply Chain website are available in the event that forced and child labour concerns need to be reported. If forced or child labour were alleged, WAA would take swift action by investigating the report and would remedy the situation accordingly.

MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES

To date, we are not aware of any instances in which Winnipeg Airport Authority’s efforts to mitigate forced labour and child labour in its business and supply chains may have contributed to a loss of income for the most vulnerable families. As such, we have not taken any steps to remediate the loss of income to the most vulnerable families.

ASSESSING OUR EFFECTIVENESS

We are committed to developing a monitoring system that will allow us to review the effectiveness of our actions for the prevention and mitigation of forced labour and child labour in our business and supply chains. We plan to engage in fulsome risk assessments of our suppliers and will evaluate a variety of risks, including those related to preventing forced and child labour.

ATTESTATION STATEMENT

“In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that this report was approved by the Winnipeg Airports Authority’s Board of Directors on April 24, 2025. 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.”



Susan Dawes, Chair of the Board

I have the authority to bind
Winnipeg Airports Authority Inc.