

**YELLOWHEAD HELICOPTERS LTD.  
ANNUAL COMPLIANCE REPORT ON FORCED LABOUR AND CHILD LABOUR  
BILL S-211, YEAR 2024**

**OPENING STATEMENT**

It is with great pride and a deep sense of responsibility that we present this report detailing our commitment and efforts to prevent forced labour within our supply chain. At Yellowhead Helicopters Ltd. we recognize the gravity of the global challenge posed by forced labour and its impact on human rights. Our commitment to ethical business practices extends beyond just mere compliance—it is a cornerstone of our identity.

We have been in business for over 45 years and in this time, we have held fast to the belief that personal freedom is of utmost importance in perpetuating a free and just world. Our mission is to contribute to our client's success through the provision of safe, quality helicopter services delivered with openness, individual pride, and company spirit. We operate our helicopters in some of the most beautiful landscapes on the planet. Being free has enabled us to do our jobs and execute our mission in a way that has benefited multiple industries, and we desire to make sure that we are doing our part to ensure that all peoples far and wide are allowed to live in the same way.

In this report, we will share the comprehensive measures we have implemented to identify, assess, and mitigate the risk of forced labour in our supply chain. By embracing transparency, accountability, and collaboration, we aim to set a standard for responsible business conduct that goes beyond mere compliance with regulations. Our journey towards eradicating forced and child labour is not just a corporate obligation but a moral imperative that we embrace wholeheartedly.

As you delve into the pages of this report, we invite you to join us on this journey of continuous improvement and ethical leadership. We aspire to create a supply chain ecosystem that stands as a beacon of freedom, dignity, and respect for all. Thank you for your interest in our commitment to preventing forced and child labour.

**SCOPE OF REPORT**

This report is being submitted as a single report representing Yellowhead Helicopters Ltd., a limited liability corporation, whose legal name is Yellowhead Helicopters Ltd. -business number 105762884. The report is outlining activities for the most recently fully completed financial year which began on January 1<sup>st</sup>, 2023, and ended on December 31<sup>st</sup>, 2024.

**LEGAL STATUS AND BUSINESS ACTIVITIES IN CANADA**

- Yellowhead Helicopters Ltd. is the only reporting entity in Canada under the legislation found in Bill S-211 Part 2, 11, (2b and 4a). Yellowhead Helicopters Ltd. acts as the central hub for compliance and oversight for all its operations regarding the import and distribution of goods within Canadian jurisdiction.
- Yellowhead Helicopters Ltd. is responsible for all shipments into Canada and manages all inbound shipments and factory relationships related to its entities and brands.

**ACTIVITIES OF YELLOWHEAD HELICOPTERS LTD.**

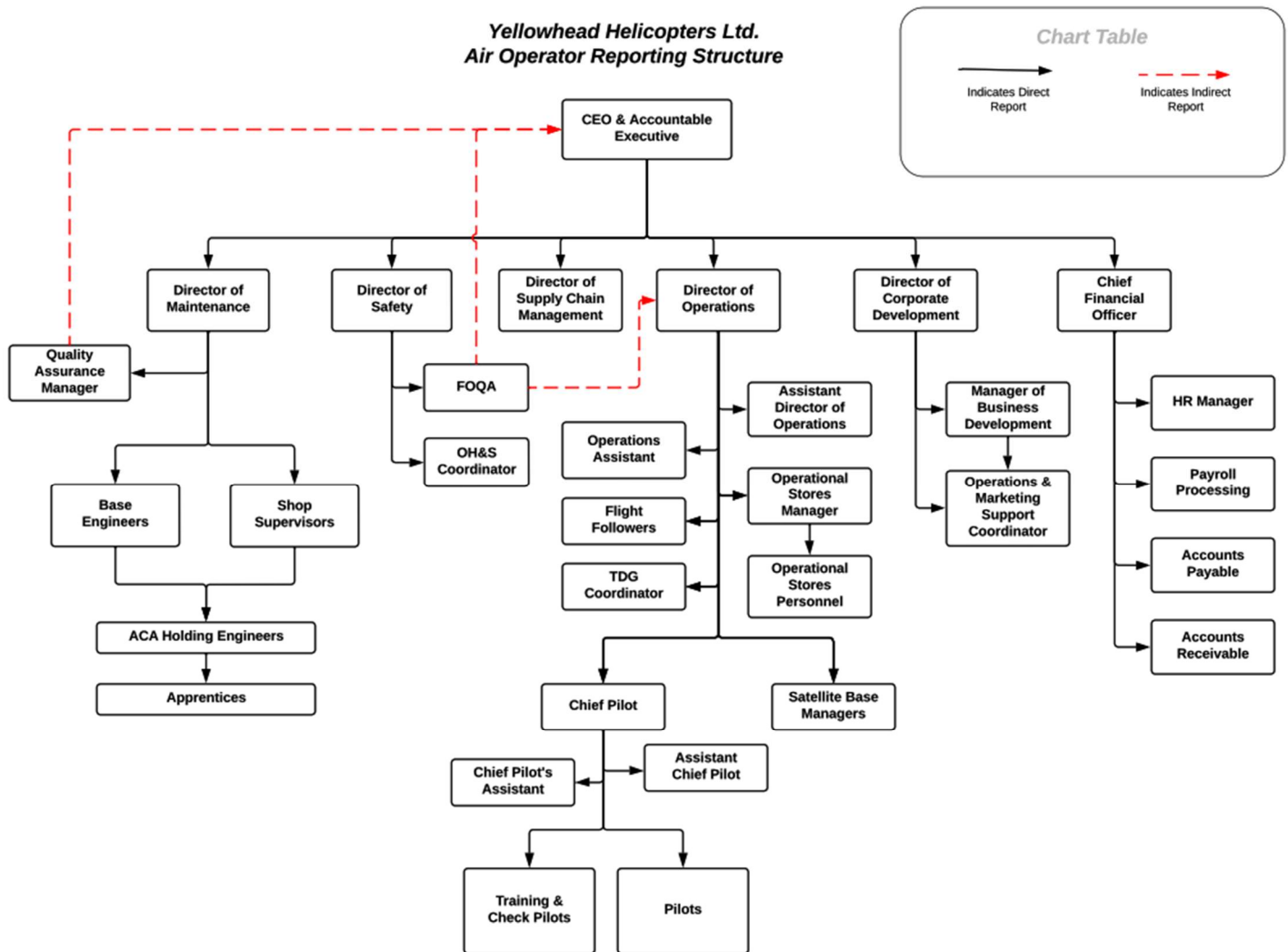
Yellowhead Helicopters Ltd. has supported the forestry, mining, petroleum, utility, and tourism industries for over 45 years. We are a privately held Canadian company that operates in British Columbia and Alberta, that has been providing commercial helicopter services and solutions to the public, various natural resource

industries, and government since 1975. Our management philosophy is focused on integrity, quality of service, and safety. We are also a proud member of the Helicopter Association of Canada (HAC).

Yellowhead Helicopters Ltd. has formed partnerships built around mutual trust and respect and aimed at engaging in various joint ventures. The purpose of these joint ventures is to provide helicopter service for various indigenous entities to service their surveying and access needs. The entities are listed below:

- a. Simpcw Resources Group Joint Venture
- b. Nisga'a Territory Premier Helicopter Operator
- c. Tahltan Territory Premier Helicopter Operator

## ORGANIZATIONAL STRUCTURE



## **SUPPLY CHAIN OVERSIGHT AND LABOUR PRACTICES**

Our supply chains originate exclusively in the United States, Australia, New Zealand, and Canada. We do not procure goods that originate from any other country. Our supply chain oversight is managed internally by our Director of Supply Chain Management who oversees all shipments of helicopters parts and other items into our facilities in Canada. We are responsible for the carriage of goods from the factory or distributor's door in the countries that we import from to our facilities here in Canada. We are also responsible for all customs clearances, payment of duties and taxes, and customs compliance pre and post import for all goods we import.

All our supply chain is managed through an audited Approved Vendors List (AVL) that requires an extensive process for approval. We review this list and conduct interviews for various quality and ethical standards. Forced and child labour are subjects that we screen our vendors for who are listed on our AVL. Yearly screening for forced and child labour amongst the vendors in our Approved Vendors List is conducted via an interview by our Supply Management Team. Our terms and conditions on our purchase orders state that as a condition of sale forced and child labour shall not be utilized in the production of the items listed on the commercial invoice. However, if forced and child labour were to be discovered amongst our vendors an immediate review would be triggered and we would begin the processes of investigation and correction which could result in terminating our relationship with the vendor in question.

## **WORKFORCE COMPOSITION**

Yellowhead Helicopters Ltd. employs a diverse and dedicated workforce that reflects our commitment to excellence and ethical business practices. There are approximately 150 employees employed by Yellowhead Helicopters Ltd. in our operations in British Columbia and Alberta.

## **REMEDATION MEASURES FOR THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES**

Currently, we have no remediation measures in place that would provide income for those who have suffered under forced and child labour.

## **REGULAR REVIEW AND POLICY UPDATE**

Our remediation strategies and policies will be reviewed regularly to ensure they remain practical and relevant to the needs of the communities we impact. This will include updating our risk assessments and remediation plans as part of our ongoing commitment to ethical practices.

## **TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR**

Yellowhead Helicopters Ltd. has trained its procurement department and supply chain employees on forced and child labour legislation as it appears in Bill S-211 via a presentation. We did this after Bill S-211 passed Parliament on May 3<sup>rd</sup>, 2023. Every employee in our Procurement Department has read and signed a forced and child labour compliance statement that we have placed on file. Adherence to the ethics and instructions on the forced and child labour compliance statement is compulsory and will be monitored closely by senior management and the executive members of Yellowhead Helicopters.

Yellowhead Helicopters Ltd. will administer an annual class on how best to identify and report forced and child labour with its Procurement and Supply Chain Management teams. The forced and child labour compliance statement will be reviewed and adjusted as necessary depending on changing regulations regarding Bill S-211.

The members of the Procurement and Supply Chain Management teams will be expected to sign the forced and child labour compliance statement annually after training.

### **ASSESSING THE EFFECTIVENESS OF OUR PLAN IN FIGHTING FORCED AND CHILD LABOUR**

Yellowhead Helicopters Ltd. does not have any in-depth assessment process save for our AVL assessment process. We will be exploring if a different assessment process is a better fit going forward as we await further changes to regulations regarding Bill S-211 in response to further developments in forced and child labour.

### **CLOSING STATEMENT**

At Yellowhead Helicopters Ltd., we remain steadfast in our commitment to ethical sourcing and supply chain integrity. Through rigorous monitoring, supplier engagement, and continuous improvement initiatives we are committed to advancing our standards to eliminate forced labour and child labour within our supply chain.

Furthermore, we recognize the importance of transparency and accountability, which is why we are dedicated to openly sharing our progress and challenges in combating forced labour. We remain committed to this cause and will continue to work tirelessly to uphold the dignity and rights of all workers throughout our supply chain.

## ATTESTATION

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 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.

Full name: Rob Parsons

Title: Director, Supply Chain Management

Date: May 20, 2025

Signature:



"I have the authority to bind Yellowhead Helicopters Ltd."