




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

Rise Air's Policy Response to
the Requirements of the
Modern Slavery Act

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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 our supply chains.

At Rise Air, we are steadfast in our commitment to cultivating robust frameworks and processes aimed at mitigating the risk of modern slavery within our business operations and supply chain. It is our unwavering belief that a proactive stance against modern slavery is fundamental to ethical business practices.

Modern slavery manifests in various insidious forms, including but not limited to slavery, servitude, human trafficking, forced marriage, forced labor, debt bondage, child labor, and deceptive recruiting for labor or services. We acknowledge the comprehensive scope of these issues as defined in the *Act*.

Our dedication to responsible business practices extends across Rise Air. We not only acknowledge our moral obligation but also understand the critical role we play in fostering an environment free from exploitation. Therefore, we adamantly adhere to the highest ethical standards in all our operations. We will not tolerate any forms of slavery within our business. This commitment is ingrained in our values, and we continuously strive to ensure that our entire business operates ethically and responsibly.

Our Values

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.

Purpose

This statement reflects our pledge to transparency and accountability in the fight against modern slavery. By outlining our approach and principles, we aim to reinforce our commitment to eradicating these heinous practices from our operations and supply chain.

Together, as a responsible corporate entity, we stand against modern slavery, advocating for positive change within our sphere of influence.

Policy Application

This policy applies to any individual or entity who work with or for Rise Air including but not limited to:

- Employees.
- Directors and other officers of the corporation.
- Independent Service Contractors.
- Contractors (including contractor's employees).
- Consultants engaged by the Company.
- Suppliers (including employees of suppliers).
- Corporate customers (including employees of corporate customers).
- Relatives, dependants, and spouses.

Our Organization

Rise Air employs over 280 personnel in locations ranging from Saskatoon to Fond-du-Lac, serving the north and working and living alongside valued customers and community partners. 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.

By taking advantage of the efficiencies unique to our broad spectrum of expertise and experience, and a variety of aircraft types to provide flexibility, Rise Air offers high-quality tailored aviation solutions, which serve, support, and promote the growth and success of Saskatchewan.

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.

Structure, Activities, and Supply Chains

Scheduled commercial flights, with larger aircraft equipped with washrooms and flight attendants, serve the communities of Saskatoon, Prince Albert, La Ronge, Stony Rapids, Fond-du-Lac, Uranium City and Wollaston Lake. Rise Air also has decades of experience providing contract charter flights, including workforce and provincial court party transportation. Several accredited maintenance bases across the province means that Medevac services, corporate and charter travel, and freight hauling are just a few of the many services Rise Air provides safely, efficiently, and reliably, 365 days a year.

Rise Air is a 100 per cent Indigenous-owned company. We work hard to deliver long-term value to our shareholders — the First Nation communities who share ownership of Rise Air through Athabasca Basin Development (ABD) and Prince Albert Development Corporation (PADC). Our profits are re-invested into the communities we serve through dividends paid to ABD and PADC.

Rise Air's operations provide funding for community development initiatives in the places we call home. We partner with local organizations to develop training and employment opportunities for First Nation community members. These initiatives create new pathways for members of First Nation communities to work in the aviation industry as pilots, flight attendants and maintenance engineers, and in our corporate areas too.

Rise Air contracts with a broad range of reputable suppliers and contractors to ensure the safety of our employees and passengers. In addition to corporate needs such as financial, human resources and technology consulting and providers; uniforms; ground services; and aviation support services, our supply chain includes manufacturers and others involved in the operation of fixed-wing aircraft and aircraft parts. All suppliers and contractors are expected to recognize and comply with Rise Air's policy on Principles for Procurement [Appendix A].

Workforce and Due Diligence Commitment

As a provider of commercial aviation services, the foundation of our operations lies in the expertise and proficiency of our ground workforce, encompassing roles such as pilots, maintenance engineers, and ground service personnel. The intricacies of aircraft components demand a workforce that is not only highly skilled but also deeply knowledgeable, ensuring safety and precision in every aspect of our services.

Equally vital to our operations are our supply-chain partners, who, like us, rely on a capable and experienced workforce. Recognizing the critical function they play in maintaining the integrity of our services, Rise Air is committed to fostering partnerships with entities that share our dedication to excellence.

Central to this commitment is our adoption of a risk-based approach in conducting due diligence with our business partners. This strategic methodology allows us to comprehensively assess potential risks and ensures that our partnerships align with the high standards of safety, precision, and proficiency that define Rise Air.

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 a 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.

Remediation Measures

At Rise Air we are resolute in our commitment to upholding the highest ethical standards across our operations, and we recognize the grave implications of forced labor and child labor. We confirm our compliance with the *Canadian Human Rights Act* and the Canadian Charter of Rights and Freedoms, and our policies and processes ensure an inclusive, diverse, equitable and accessible workplace, and include specific policies on non-discrimination, health and safety, anti-bribery and whistleblowing as well as a corporate code of conduct. We are dedicated to eradicating these practices from our business operations, and we take decisive measures to address any identified instances.

The risk of modern slavery within Rise Air and its supply chain is assessed by the Board's Human Resources, Governance and Risk Committee, with a 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.

- **Rigorous audits and assessments:** We conduct regular and rigorous audits of our operations and supply chain to identify and assess any potential risks related to forced labor or child labor. These assessments are comprehensive and extend to all levels of our business.
- **Education and training:** All employees receive training on policies and procedures. Maintenance stores and logistics employees, flight and cabin crews, and ground and customer service staff receive further training to ensure awareness of the risks of modern slavery; ensure they can collaborate with suppliers to identify and reduce risks; and use the company safety management system appropriately to report incidents.
- **IT Systems and Technology:** Multiple layers of web filtering detect and prevent child labour, forced labour, and trafficking activity including directly on firewalls and through a filtering agent on each workstation.
- **Immediate action:** Upon identification of any instance of forced labor or child labor, we take immediate and decisive action. This includes the suspension of relationships with the involved parties pending further investigation.
- **Collaborative remediation:** We believe in collaborative efforts to address these critical issues. In instances where remediation is feasible, we collaborate closely with the affected parties, relevant stakeholders, and expert organizations to implement appropriate remediation measures. Our goal is not only to rectify the immediate situation but also to contribute to systemic improvements.
- **Supplier education and support:** We recognize that awareness and education are fundamental to addressing these challenges. We actively engage with our suppliers, providing educational resources and support to ensure a shared understanding of our commitment to eradicating forced labor and child labor.

- **Continuous Improvement:** Our commitment to eliminating forced labor and child labor is an ongoing process. We continually review and enhance our policies, procedures, and monitoring mechanisms to stay vigilant and responsive to emerging challenges.
- **Transparency and reporting:** Transparency is a cornerstone of our approach. We communicate transparently about our efforts, progress, and challenges in addressing forced labor and child labor. This commitment extends to our stakeholders, including customers, employees, and investors.
- **Industry organizations:** Rise Air employees are members of, and participate in, many industry organizations and working committees to raise awareness of issues facing the aviation community and develop steps and policies to mitigate.

Appendix A: Modern Slavery Checklist

Regularly checking this statement is just one way to ensure Rise Air is compliant with the *Modern Slavery Act*. We will continue to build on our commitment to ethical business practices by fostering a culture of continuous improvement and aim to set or improve the following:

1. Review the modern slavery statement
Assess what improvements need to be made to bring the statement up-to-date and more meaningful.
2. Identify modern slavery risks
Find the key risks within the business. Think about which parts of the supply chain or business areas are most vulnerable. Know which products, suppliers and services are more prone to slavery.
3. Develop organizational key performance indicators (KPIs) to assess and measure the effectiveness of our strategy including:
 - a. Number of reported suspected incidents.
 - b. Number of staff trained.
 - c. Non-compliance found through due diligence.
 - d. Number of investigations conducted by Rise Air.
4. Conduct supplier due diligence
Require suppliers to provide a copy of their modern slavery statement and conduct audits on those that fall into high-risk categories.

Ongoing focus on improving supplier profiles and ensuring supplier contracts are saved on our company library database.
5. Perform human rights due diligence
Perform human rights due diligence on our company and supply chain to better understand potential areas of exposure or key risk in our operations.
6. Review workplace modern slavery policies
Annually assess corporate policies regularly to ensure they are kept up-to-date and reflect any changing risks.
7. Appoint someone to take the lead
Appoint the occupational health and safety officer the responsibility for driving forward efforts to eliminate modern slavery and trafficking in business and supply chains.

8. Train Staff

Develop and launch new e-learning module for corporate employees to raise awareness of modern slavery and human trafficking and enhance training provided to ground and flight operations teams to help spot the signs and increase confidence in reporting suspected cases.

9. Use modern slavery best practices

Collaborate with industry partners and stakeholders to benchmark progress and best practices.

10. Ethical business

Stakeholders, investors, suppliers, customers need to prove through their statements and practices due diligence, adherence to the principles of human rights and demonstrate good governance and effective management.

By implementing these measures, we aim not only to rectify instances of forced labor or child labor promptly but also to contribute to broader industry efforts to eliminate these egregious practices. Our commitment to ethical business practices remains steadfast, and we actively strive to create an environment where every individual is treated with dignity and respect.