




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

2024 Modern Slavery Report

Rise Air and Snowbird Aviation Services
April 2025



Contents

Introduction2

Corporate Structure, Activities and Supply Chains2

 Our Organization2

 Activities2

 Airline Services Division2

 Supply Chains3

Policies and Due Diligence3

Forced Labour and Child Labour Risks3

Remediation Measures4

Remediation of Loss of Income4

Training4

Effectiveness5

Approval and Attestation6

Appendices7

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: _____

Appendices

Appendix A – Principles of Procurement

Appendix B – Principles of Conduct