



FORCED LABOUR AND CHILD LABOUR REPORT

Structure, Activities, and Supply Chains

Structure:

Air North Charter & Training Ltd. (“Air North”) is a privately-owned federal corporation headquartered in Whitehorse, Yukon, Canada. We operate as an airline which is 100% owned by Yukoners. The airline employs approximately 450 staff, including pilots, cabin crew, maintenance engineers, customer service agents, ground agents, catering and grooming, cargo and administrative personnel. Air North is the managing partner of Air North Partnership.

Activities:

Air North provides a range of services in the commercial aviation sector, with the following core activities:

Passenger Transport, Cargo Services, Charter Services and Fuel Supply through an affiliate.

Over the past year, aircraft and aircraft parts were purchased from the United States.

Supply Chain:

Air North relies on a global supply chain to support its operations. Key components include:

Aircraft and aircraft parts, in-flight services, catering supplies, ground operations, fuel supplies (through an affiliate), uniforms.

Components purchased directly from countries other than Canada include one aircraft and aircraft parts.

Policies and Due Diligence

Policies:

Code of Conduct

Anti-Bribery Policy (draft)

Introduction of Acceptable Use and Cyber Security Policy Version R002

Confidential and Anonymous Reporting through our Safety Management System (SMS)

Due Diligence:

Air North is committed to upholding the highest standards of ethical behavior and integrity in all business dealings. We expect every employee to act with honesty, transparency, fairness, and professionalism in their interactions with customers, suppliers, colleagues, and other stakeholders.

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Adherence to our Code of Conduct is mandatory. All employees are required to read, understand, and formally acknowledge the Code of Conduct as a condition of their employment.

In addition to core principles of honesty and integrity, the Code addresses several critical areas, including:

- **Legal Compliance:** Fully comply with all laws and regulations (environmental, safety, health, IP, privacy, anti-discrimination).
- **Ethical Behavior:** Act with honesty, integrity, and fairness in all dealings.
- **Conflicts of Interest:** Avoid and disclose any personal conflicts with professional duties.
- **Company Assets:** Protect and use assets (physical, confidential, IP) only for legitimate business purposes.
- **Equal Opportunity:** Provide equal employment opportunity; prohibit discrimination, harassment, and retaliation.
- **Diversity & Inclusion:** Foster a diverse, inclusive, and bias-free workplace.
- **Health & Safety:** Maintain a safe work environment and report hazards.
- **Social Responsibility:** Contribute positively to communities, respect the environment and human rights.
- **Reporting Violations:** Report suspected breaches; protected from retaliation for good-faith reports.

Employees are encouraged to report any suspected violations of the Code of Conduct through established channels, with full assurance of non-retaliation. Upholding these standards is essential to maintaining the trust placed in us by our customers, partners, and the communities we serve.

We remain committed to the ongoing development and revision of our Anti-Bribery Policy for implementation in 2026.

Risk Assessment and Management

Risk Areas:

Air North assesses the risk of forced or child labour among its direct workforce as low, owing to stringent Canadian labour regulations and unionized work environments. We regularly procure components and assets, coupled with the technologically advanced and safety-critical nature of our operations, the vast majority of our suppliers are sophisticated entities.

These suppliers are typically subject to stringent regulations, such as those comparable to the Canadian legislation. Many are publicly traded, necessitating comprehensive reporting and due diligence to ensure compliance with all applicable laws.



Risk Management Steps:

- The Safety Department will advise on any SMS reports related to forced labour to enable timely implementation of mitigation actions.
- Continue to implement forced labour clauses in all contracts with suppliers.

Remediation Measures

- No confirmed instances of forced or child labour were identified in our supply chain during the reporting period.
- If forced or child labour is identified, we would suspend the supplier relationship and require remediation before reinstatement.

Reporting: All employees can report concerns through our Safety Management System (SMS) and if they choose anonymously.

Measures to remediate loss of income to vulnerable families

- No confirmed instances of loss of income to vulnerable families

Employee Training

Training Provided: Training will continue to be developed and implemented for applicable employees. Additionally, the Flight Attendant Manager is tasked with researching and evaluating specialized human trafficking training programs for inflight crew. This initiative will focus on enhancing awareness and response capabilities related to forced labour and child labour within the aviation environment.

Assessment of Effectiveness

We continuously evaluate the effectiveness of our policies as they evolve and expand. Even in the absence of modern slavery within our operations, we maintain a proactive and forward-looking approach that sustains vigilance and enables us to identify and address potential risks before they materialize.

Summary:

Air North recognizes the importance of responsible supply chain practices and is committed to working toward the prevention of forced and child labour. The Company aims to foster a culture of awareness and accountability through policy development, supplier collaboration, and continued education and oversight.



In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Chief Executive Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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 within this report. Have the authority to bind Air North, Yukon's Airline.

J Sparling

Joseph Sparling

Chief Executive Officer of Air North, Yukon's Airline

May 31, 2026

