



Fighting Against Forced Labour and Child Labour in Supply Chains Act **Annual Report for the Fiscal Year Ending October 31, 2024**





SECTION 1 –
ENTITY STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

1.1 Corporate Structure, its activities and entities

De Havilland Aircraft of Canada Limited (formerly Longview Aviation Capital Corp.) is a corporation constituted under the laws of the Province of Alberta (hereafter referred to as “DHC”). DHC engages in a variety of operations related to aircraft manufacturing, maintenance, repair & overhaul services, aircraft sales & resale, aftermarket spare parts and product support. DHC’s financial reporting year is from November 1 to October 31.

As of August 1, 2024 (the “Amalgamation Date”); DHC has successfully amalgamated into a single corporate entity with certain of its former subsidiaries.

DEFINITIONS

In this report the definition terms in upper case shall be defined terms throughout this report as follows:

“Entity” refers De Havilland Aircraft of Canada Limited in this report.

“FLCL” means forced labour and/or child labour.

“FLCL Act” means reference to S211: *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada).

“Supplier” means any supplier, contractor, or consultant conducting business in its supply chain with DHC.

1.2 JOINT REPORT OF DHC AND ITS CONTROLLED ENTITIES (not applicable)

This report includes DHC only because its controlled entities do not meet the minimum requirements of reporting as a standalone entity as stipulated in subsection 11(2) of the Act.

1.3 SUPPLY CHAIN ACTIVITIES OF THE ENTITY

With respect to the supply chain related to DHC; a non-exhaustive and general description related to all the suppliers, resources, activities, production, materials related to aircraft manufacturing, maintenance, repair & overhaul activities, spare parts sales, flight training services, warehousing and avionics.

ACTIVITY TYPE	(YES/NO)
Producing goods (Including manufacturing, extracting, growing and processing)	Yes
in Canada	Yes
outside Canada	No
Selling goods	Yes



in Canada	Yes
outside Canada	Yes
Distributing goods	Yes
in Canada	Yes
outside Canada	Yes
Importing into Canada goods produced outside Canada	Yes
Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada	Yes

Figure 2– DHC supply chain activities

SECTION 2 –

POLICIES & DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR/ CHILD LABOUR

3.1 POLICIES RELATED TO FLCL

Supplier Code of Conduct

DHC has existing corporate policies set forth in its *Supplier Code of Conduct* related to forced labour for its activities. This policy states that any Supplier who engages in forced labour or has been found to be engaged in forced labour by DHC shall have their business or contract immediately suspended or cancelled. The policy states that DHC reserves the right to terminate and cease all operations and business relations with any Supplier if they are determined to have engaged in activities defined as FLCL.

Regarding child labour policies, DHC continues to maintain its *Supplier Code of Conduct* to include anti-child labour policies as obligations upon all Suppliers who conduct business or seek to conduct business with DHC.

Code of Ethics & Business Conduct

DHC has additional corporate policies set forth in its *Code of Ethics and Business Conduct*. The *Code of Ethics and Business Conduct* policy sets forth the standards of behavior that DHC expects of the employees, officers and directors DHC. Our code applies to all employees, officers and directors of DHC. Our goal is to demonstrate the best practices regarding ethics and integrity in all our dealings with customers, suppliers, governments and other stakeholders.

Procurement Contracts, RFP Documents, PO Terms & Conditions, Various policy provisions

Additionally, DHC generally includes anti-forced labour clauses in its procurement contracts and purchase order terms and conditions (PO T&C's) for all Suppliers or contractors seeking business with DHC. FLCL provisions expressly state that any Supplier that engages in FLCL shall be disqualified from any RFP award. If a contract has been awarded and already executed during which FLCL activities are discovered, DHC has the right to conduct further due diligence and reserves the right to suspend the contract or elect to terminate all business dealings with that specific Supplier.



External facing website – Policies posted online

DHC has posted its *Supplier Code of Conduct* and its *Code of Ethics & Business Conduct* to its website so that these policies are available to its employees, the public, and to all Suppliers working with DHC. These policies are posted on DHC's website www.dehavilland.com/portal.

3.2 DUE DILIGENCE PROCESSES RELATED TO FLCL

Although DHC has policies and governance surrounding FLCL in place, there are positive actions taken towards identifying and addressing FLCL in its supply chain. As a layered approach, the process for onboarding Suppliers (new suppliers, the RFP award process, new supply chain procurement activities and new contract awards) and the contract document awards (new contract provisions updated with anti-FLCL obligations) are all part of the due diligence process before any Supplier is approved to work with DHC.

Ethixbase360 – third-party FLCL due diligence reporting service provider

To address ongoing due diligence after a Supplier has been awarded a contract, DHC has implemented a monitoring and audit process by issuing a mandatory Annual Form Report ("Report") to our Suppliers. The administration of the Report is automated through our third-party service provider ("**Ethixbase360**").

Due diligence with annual reporting on FLCL

To conduct due diligence of its Supplier base, DHC has contracted the services of Ethixbase360.

The Ethixbase360 platform conducts ongoing annual FLCL questionnaire and reporting from the Suppliers that will assist in determining if there is a risk of those activities in their supply chain. The questionnaire report encompasses many risk factors in its questionnaire that includes, but not limited to:

- a. Geographical location of supplier, and the risk of FLCL in that region;
- b. Sector or industry of raw material mining, or processing;
- c. Political regions where FLCL have been known to occur;
- d. Countries or organizations that have been deemed to have conducted FLCL activities; and
- e. Other metrics offered by Ethixbase360 as selected by DHC.

Ethixbase360 has conducted the same application in other similar and common-law jurisdictions related to FLCL such as Australia, United Kingdom, United States, and various EU member countries. The service provided includes a reporting requirement upon the Supplier, and an attestation document.

All Suppliers currently conducting business will be required (mandatory) to complete this Report and submit it to DHC. The 3rd party reporting service analyzes and determines a risk score to the Supplier, based on the score metrics above from the responses provided in their report.



ELEMENTS OF DUE DILIGENCE CONDUCTED	Completed Action (Yes/No)
Embedding responsible business conduct into policies and management systems	Yes
Identifying and assessing adverse impacts in operations, supply chains and business relationships	Yes
Ceasing, preventing or mitigating adverse impacts	Yes
Tracking implementation and results	Yes
Communicating how impacts are addressed	Yes
Providing for or cooperating in remediation when appropriate	Not yet (ongoing)

Figure 3 – Elements of Due Diligence conducted

DASHBOARD SUMMARY OF SUPPLIERS AT RISK FOR FLCL BASED ON ANNUAL FORM RESPONSES	Risk Detection Value
Low risk of FLCL	Less than 2%
Moderate risk	0%
High Risk	0%

Figure 3.1 – Summary of Key risk metrics of DHC Suppliers that participated in the Annual Form based on Ethixbase risk matrix collated and summarized from Supplier Annual responses.

SECTION 3 –

PARTS OF DHC BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FLCL, AND STEPS TAKEN TO MANAGE THIS RISK

3.1 PARTS OF DHC BUSINESS & SUPPLY CHAINS THAT CARRY A RISK OF FLCL ACTIVITY

Due to the nature of DHC’s business with international suppliers that include raw materials and components that may be sourced in various jurisdictions imported into Canada for production, or used for distribution to other aircraft operators, there are potential areas that may have a higher risk of FLCL activities.



The following areas have been assessed by DHC as to whether they potentially carry a risk of FLCL activities (non-exhaustive list):

AREAS OF RISK FOR FLCL	FLCL identified in supply chain? (Yes/No/ Ongoing)
The sector, or industry it operates in	No
The types of products it produces, purchases or distributes	No
The locations of its activities, operations or factories	No
The types of products it sources	No
The raw materials or commodities used in its supply chains	No
Tier one (direct) suppliers	No
Tier two suppliers	No
Tier three suppliers	No
Suppliers further down the supply chain than tier three	Ongoing
The use of outsourced, contracted or subcontracted labour	No
The use of migrant labour	No
The use of forced labour	No
The use of child labour	No
Comments – Additional Information The process to review and analyze responses from all Suppliers is currently underway at the time of this report, but the results and information gathered from the Suppliers has not yet been completed by all the Suppliers, and the results have not been compiled into a summary report.	Yes

Figure 4 – Areas of risk for FLCL identified

DHC is committed to reviewing and monitoring the above areas of risk in its business and supply chain. As of the date of submission of this annual report, DHC has engaged with its Suppliers to complete the Report to address all the above areas of risk. DHC is currently analyzing and monitoring the findings. We have submitted a requirement to all Suppliers to provide their information through our third-party service (Ethixbase360).

3.2 STEPS TAKEN TO MANAGE RISK OF FLCL IN SUPPLY CHAINS

Reporting requirement of Suppliers

As of the date of this report, DHC has initiated its due diligence in reporting areas of the business and supply chain that may carry a risk of FLCL activities. Our reporting and monitoring metrics are derived from Ethixbase360’s reporting for the reporting period of May 31, 2024 to May 20, 2025.

Non-compliant Suppliers

Those Suppliers who have not yet responded to completing their report have been reminded several times to comply with this due diligence report, including with several notifications throughout the year if required. The notification will also remind the Suppliers that if they do not complete the report, that DHC reserves the right to suspend or terminate business with the non-compliant Suppliers.



DHC ACTIONS FOR IDENTIFYING FLCL RISKS	(YES/ NO)
We have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.	Yes
We have started the process of identifying risks, but there are still gaps in our assessments.	Yes
We have not started the process of identifying risks	No
We have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.	Yes (ongoing)

Figure 5 – Summary of actions for identifying FLCL risks

SECTION 4 –
MEASURES TAKEN BY DHC TO REMEDIATE FLCL RISKS

4.1 REPORTING REQUIREMENTS UPON ALL SUPPLIERS

The first step required prior to remediating FLCL risks is to identify those metrics within the supply chain. Currently, DHC has initiated the process with its Suppliers. This reporting year, we have observed an increase in the number of Report responses from our Suppliers, although there we are still observing that some Suppliers submit their Reports and data late, or incomplete. Our automated system generates several reminders and notifications for commencing in October of 2024, and continues into early January 2025, and subsequent reminders every 3 weeks until May 20, 2025. The next reporting cycle restarts on June 3, 2025 until May 20, 2026.

4.2 REMEDIAL ACTIONS FOR NON-COMPLIANT SUPPLIERS

For Suppliers that refuse to participate or complete the Report, DHC has stated that it reserves the right to suspend and/or terminate work with any Supplier to be non-compliant. This message has been included in our *Supplier Code of Conduct* and will be an obligation upon all Suppliers through DHC’s policies, and documents. This will also include portions of the Supplier’s Representations provisions in DHC’s contracts whereby the activities of FLCL shall be a breach of their contractual obligations. For more accuracy, DHC has updated and filtered Suppliers that are exempt from the Report (such as IT and professional/ consulting services). Originally, DHC had required all Suppliers to submit a report, but understood that not all Suppliers qualify or have any FLCL risks based on their services.



4.3 REMEDIAL ACTIONS FOR SUPPLIERS THAT ARE DEEMED HIGH-RISK FOR FLCL

It is DHC's policy that Suppliers deemed high-risk for FLCL in their supply chains shall be reviewed; and if the Supplier's do not remediate or clarify and justify why their status should be perceived as high-risk; then DHC shall take remedial actions such as immediately suspending and/or termination of contracts or working with that Supplier to reduce their risk profile.

If the Supplier has been flagged in other jurisdictions for violating FLCL laws, DHC will review and potentially deem that Supplier as perceived high-risk for FLCL. For this reporting period, DHC has detected zero high risk Suppliers, and less than 2% are low risk Suppliers based on our dashboard metrics.

SECTION 5 –

MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO MOST VULNERABLE FAMILIES RESULTING FROM MEASURES TAKEN TO ELIMINATE FLCL

5.1 ACTIONS TAKEN TO REMEDIATE LOSS OF INCOME TO VULNERABLE FAMILIES

As of the date of this annual report, DHC is not able to identify any FLCL activities, and its impact on vulnerable families. Therefore, there have been no action taken to remediate loss of income to those affected vulnerable families as of the date of this annual report.

SECTION 6 –

TRAINING PROVIDED TO DHC'S EMPLOYEES FOR FLCL

6.1 TRAINING RELATED TO FLCL

DHC provides an online training course for its *Code of Ethics & Business Conduct (the "Code")* as part of every new employee's onboarding and certification of course completion, and an acknowledgement to be bound by the *Code* is required from all participants. While our *Code* does not specifically address issues of modern slavery, it affirms our goal of demonstrating the best practices regarding ethics and integrity in all dealings with customers, suppliers, governments and other stakeholders. It is anticipated that education and training related to FLCL will become part of future policy training in the future.



SECTION 7 –
ASSESSING THE EFFECTIVENESS IN ENSURING THAT FLCL IS NOT USED IN ITS BUSINESS AND SUPPLY CHAINS

7.1 ASSESSING EFFECTIVENESS THAT FLCL IS NOT BEING USED

Ethixbase360: Third-party organization to conduct independent review

There have been initial measures undertaken by DHC to assess the effectiveness that FLCL is not being used in its business and supply chains. DHC has improved the compliance from Suppliers for this current reporting period to encourage participation in the Annual Response Form and submitting them in time for the annual report. This has been achieved by increasing the number of electronic reminders, the frequency of the notices to Suppliers, and removal of exempt Suppliers.

Annual internal review of Effectiveness

Based on the analysis and reports derived from Suppliers who have completed their Reports, DHC will be able to assess its effectiveness in addressing the high-risk actions of its business and supply chains. It is the intent that DHC will be able to conduct an annual year over year (“YoY”) review of the progress made related to enforcing its measures against those Suppliers that are high-risk of engaging in FLCL in their business, and the actions that DHC has taken in response. The following table outlines DHC’s actions taken to assess its effectiveness to date.

METHOD TO ASSESS EFFECTIVENESS	YES/ NO
Setting up a regular review or audit of the organization’s policies and procedures related to forced labour and child labour	Yes Bi-annually
Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses	No (in development)
Partnering with an external organization to conduct an independent review or audit of the organization’s actions	Yes
Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators	Yes

Figure 7 – Dashboard Metrics measured regarding FLCL in supply chain



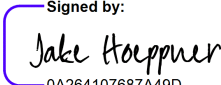
APPROVAL AND ATTESTATION OF ANNUAL REPORT

Fighting Against Forced Labour and Child Labour in Supply Chains Act

This annual report has been approved by authorized officers of **De Havilland Aircraft of Canada Limited** for the financial year ending **October 31, 2024**.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”), and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for 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 above.

I hereby have the authority to bind **De Haviland Aircraft of Canada Limited**:

Per:	<div>Signed by:  0A264107687A49D...</div>
Name:	Jake Hoepfner
Title:	General Counsel
Date:	May 30, 2025 4:19 PM MDT