



2025 Modern Slavery Report

De Havilland Aircraft of Canada Limited

Fighting Against Forced Labour and Child Labour in Supply Chains Act

1. Introduction

This report is produced by De Havilland Aircraft of Canada Limited ("**DHC**", "**De Havilland**", "**we**", "**us**" or "**our**") for the financial year ending October 31, 2025 (the "**2025 Reporting Period**"). It sets out the steps taken during the 2025 Reporting Period to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada by DHC or of goods imported into Canada and integrated in aircraft manufactured and supported by DHC.

This report is prepared pursuant to *Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**"). This is a single entity report for DHC and does not constitute a joint report. Unless otherwise indicated, references in this report to forced labour and child labour have the meanings given to those terms in the Act.

DHC continued to mature its modern slavery compliance and supplier monitoring program during the 2025 Reporting Period. DHC expanded supplier outreach, continued to use a third-party due diligence platform to support supplier questionnaires and risk review, identified opportunities to improve supplier data quality and supplier categorization, and began aligning future monitoring more closely with the goods-related focus of the Act.

2. Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

DHC considers ethical business conduct, responsible sourcing and respect for human rights to be important elements of its business practices. In general terms, during the 2025 Reporting Period, DHC took the following steps to prevent and reduce the risk of forced labour and child labour in its business and supply chains:

- Maintained and applied corporate policies, including the Code of Ethics and Business Conduct (the "**Code of Ethics**") and Supplier Code of Conduct (the "**Supplier Code**"), which set standards of conduct for DHC employees and requirements for suppliers;
- Continued to communicate anti-forced labour and anti-child labour requirements to its supply base through (i) the Supplier Code, which was updated in 2025 to include specific provisions on forced labour and child labour; and (ii) where applicable, specific compliance-related obligations in supplier-facing documents, including procurement contracts, request-for-proposal materials, purchase order terms and supplier representations;
- Distributed modern slavery questionnaires through DHC's third-party due diligence platform to suppliers on DHC's master supplier list; and
- Reviewed supplier questionnaire activity, due diligence alerts and supplier risk indicators through the third-party platform, and continued to issue reminders to suppliers that had not completed requested questionnaires.

These actions built on DHC's prior reporting cycle and were reviewed and refined to better align supplier monitoring with DHC's goods-related activities and risk profile. This continuous improvement process will remain a priority for the 2026 reporting period.

3. Structure, Activities and Supply Chains

DHC is a corporation constituted under the laws of the Province of Alberta, with a financial reporting year that runs from November 1 to October 31.

DHC engages in a range of aviation-related activities, including aircraft manufacturing, maintenance, repair and overhaul (MRO) services, aircraft sales and resale, aftermarket spare parts, product support, flight training services, warehousing and avionics support. DHC's activities include the production of goods in Canada, the sale and distribution of goods in Canada and outside Canada, and the importation into Canada of goods produced outside Canada.

DHC's supply chain includes suppliers of raw materials, aircraft components, aircraft systems, spare parts, tooling, manufacturing inputs, MRO support, logistics and other business support. DHC's supplier records include suppliers located primarily in Canada and the United States, with additional suppliers located in the United Kingdom, Europe, Australia, Asia and other jurisdictions relevant to DHC's aviation operations.

Supplier location information is based on DHC's supplier records and may not always reflect the country of origin of goods, components or raw materials. DHC continues to improve its visibility into supplier categories and source geographies, including through supplier questionnaires, ERP-related improvements and ongoing supplier data validation.

Given the nature of aerospace manufacturing and aftermarket support, potential forced labour and child labour risks may arise in relation to internationally sourced materials and components, certain raw materials and commodities, lower tiers of the supply chain, outsourced or subcontracted labour, and suppliers operating in or sourcing from jurisdictions with heightened human rights, labour or governance risk indicators.

4. Policies, Governance and Due Diligence Processes

Governance and internal accountability

DHC's modern slavery compliance work is supported by relevant internal functions, including legal, procurement, supply chain, finance and other business teams involved in supplier onboarding, contracting, payment records, supplier data management and compliance reporting. DHC continues to mature its governance and documentation processes year over year, including by improving the quality of supplier data used for modern slavery monitoring and reporting.

Code of Ethics and Business Conduct

DHC's Code of Ethics sets out standards of conduct for DHC employees, officers and directors. The Code of Ethics is intended to promote ethical conduct, integrity and responsible dealings with customers, suppliers, governments and other stakeholders. DHC provides Code of Ethics-related training through its employee onboarding process and requires participants to acknowledge the Code of Ethics.

Supplier Code of Conduct

DHC's Supplier Code sets out standards and requirements for suppliers that conduct business, or seek to conduct business, with DHC. The Supplier Code includes provisions relating to forced labour and child labour. DHC reserves the right to suspend, terminate or cease business relationships with suppliers that engage in forced labour or child labour, or that fail to address identified concerns to DHC's satisfaction.

Procurement terms and supplier representations

DHC communicates anti-forced labour and anti-child labour requirements through its Supplier Code and, where applicable, through supplier-facing documents such as procurement contracts, request-for-proposal materials, purchase order terms and supplier representations. These requirements support DHC's ability to conduct further due diligence, request information from suppliers and assess suppliers' compliance with DHC's standards and requirements.

Third-party due diligence platform

During the Reporting Period, DHC used Ethixbase360, a third-party due diligence and monitoring platform, to administer supplier questionnaires and support supplier risk review. The questionnaire process requests information regarding suppliers' operations, sourcing, workforce practices, modern slavery policies, supplier controls, remediation frameworks and supplier acknowledgements. The platform also supports risk scoring, due diligence alerts, response tracking and monitoring of supplier completion status.

Availability of policies and codes

DHC has made its Code of Ethics and its Supplier Code available through its external website at <https://dehavilland.com/portals>. Employees may also access these documents through DHC's internal intranet resources. These resources help employees, suppliers and other stakeholders understand the standards of conduct and supplier requirements that support DHC's approach to ethical business conduct and responsible sourcing.

5. Assessing and Managing Risk and Verification of Supply Chains

DHC uses a risk-based approach to assess and manage forced labour and child labour risks. Relevant risk indicators include the type of goods or services supplied, the supplier's role in DHC's production of goods or importation of goods, supplier jurisdiction, sourcing geography, sector and raw-material risk, due diligence alerts, questionnaire responses, and whether the supplier is a direct or indirect supplier to DHC.

For the 2025 reporting cycle, DHC distributed questionnaires through Ethixbase360, DHC's third-party due diligence platform, using DHC's master supplier list. This broad distribution included goods-related suppliers as well as a broader population of service-only providers. DHC took this approach to increase visibility across its supplier base and to support year-over-year improvement in supplier monitoring. DHC received and reviewed completed questionnaire responses through the platform. DHC uses questionnaire completion and response data directionally to support supplier risk review and program improvement, recognizing that platform data may include multiple questionnaire records for a single third-party ID and records associated with more than one questionnaire issuance cycle.

DHC implemented a new company-wide ERP system for broader business and operational purposes during the 2025 Reporting Period. Because multiple ERP systems were in use during portions of the 2025 Reporting Period, supplier data collection, supplier categorization and response tracking were more complex than anticipated. While some transitional challenges may remain, DHC expects the new ERP system to improve data consistency, supplier visibility and reporting capabilities in future years, including the 2026 reporting cycle.

DHC reviews questionnaire responses and due diligence alerts to identify potential risk indicators, including incomplete responses, inconsistent information, adverse responses, sanctions or watchlist alerts, and suppliers that do not confirm adherence to the Supplier Code or other applicable supplier requirements. DHC uses this information to support supplier risk review and ongoing program improvement.

Based on information available through DHC's supplier review and report preparation process, DHC did not identify any confirmed instances of forced labour or child labour in its own operations or supply chains during the 2025 Reporting Period. DHC continues to monitor supplier responses and risk indicators and to improve the underlying processes used to assess supplier risk.

6. Remediation Measures and Remediation of Loss of Income

DHC did not identify any confirmed instances of forced labour or child labour in its own operations or supply chains during the 2025 Reporting Period. Accordingly, no specific remediation measures were taken for confirmed forced labour or child labour incidents during the 2025 Reporting Period.

Because DHC did not take measures to eliminate confirmed forced labour or child labour during the 2025 Reporting Period, DHC did not identify any related loss of income to vulnerable families and did not take measures to remediate such loss of income.

7. Training

DHC provides an online training course on its Code of Ethics as part of new employee onboarding and requires participants to acknowledge the Code of Ethics. The Code of Ethics supports DHC's standards for ethical conduct and integrity in dealings with customers, suppliers, governments and other stakeholders.

DHC did not provide a stand-alone modern slavery training module to all employees during the 2025 Reporting Period. DHC continues to evaluate opportunities to provide more targeted modern slavery training and awareness to employees whose roles are most closely connected to supplier onboarding, procurement, supply chain management, contracting, compliance and supplier data management. DHC expects future training and awareness activities to be informed by the supplier list refinement, contact validation work and ERP-related process improvements described in this report.

8. Assessing Effectiveness and Continuous Improvement

DHC assesses the effectiveness of its modern slavery risk management activities through a combination of policy review, supplier questionnaire tracking, third-party due diligence monitoring, review of supplier risk indicators, and internal review of supplier data quality and process gaps. DHC also uses the annual reporting cycle to assess year-over-year progress and identify opportunities to strengthen its program.

During the 2025 Reporting Period, DHC made meaningful progress relative to the 2024 reporting cycle by broadening supplier outreach, identifying service-only suppliers that may be removed from or deprioritized in future monitoring under the Act where appropriate, identifying supplier contact data issues, and mapping the impact of the ERP transition on supplier data collection and tracking. These improvements are expected to help DHC focus future supplier monitoring on suppliers that present the most relevant goods-related risk and to improve the reliability of questionnaire completion and risk-reporting data.

DHC's priorities for the next reporting cycle include:

- Refining and narrowing the supplier monitoring population to align with the Act and DHC's risk profile;
- Validating supplier contact information and improving questionnaire delivery data before questionnaires are distributed;
- Leveraging the new ERP system to improve supplier categorization, consistency of supplier records and visibility into supplier activity;
- Continuing to track questionnaire completion, incomplete responses and potential risk indicators through the third-party due diligence platform; and
- Considering updates to employee training and awareness for functions involved in supplier onboarding, contracting, procurement, supply chain and compliance reporting.

DHC expects these measures to further strengthen compliance processes and external reporting quality in 2026 and beyond.

9. Approval and Attestation

This report was approved pursuant to paragraph 11(4)(a) of the Act by the Executive of De Havilland Aircraft of Canada Limited. The undersigned officer has been authorized to sign this attestation on behalf of De Havilland Aircraft of Canada Limited.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

The undersigned makes the above attestation in his capacity as General Counsel of De Havilland Aircraft of Canada Limited and has been authorized to sign this report on behalf of De Havilland Aircraft of Canada Limited. I have the authority to bind De Havilland Aircraft of Canada Limited.

Per:	
Full Name:	Jake Hoepfner
Title:	General Counsel, De Havilland Aircraft of Canada Limited
Date:	May 29, 2026