

AVMAX REPORT ON
FORCED LABOUR AND CHILD LABOUR
IN SUPPLY CHAINS

2024

Avmax Group Inc.
Avmax Aviation Services Inc.
Avmax Aircraft Leasing Inc.

Fighting Against Forced Labour and Child Labour in Supply Chains Act

GENERAL

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) imposes obligations on Avmax to report on the measures taken to prevent and reduce the risk that forced labour or child labour is used by suppliers in Avmax’s supply chains.

This report has been prepared to report on Avmax’s efforts to address the obligations specified by the Act.

AVMAX STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Avmax (including Avmax Group Inc., Avmax Aircraft Leasing Inc., and Avmax Aviation Services Inc.) has approximately 250 Canadian employees spread across five locations in Calgary, Alberta, plus locations in Winnipeg, Manitoba, and Vancouver, British Columbia. Avmax Aircraft Leasing Inc., and Avmax Aviation Services Inc. are wholly-owned subsidiaries of Avmax Group Inc.

Avmax purchases aircraft and aircraft parts from suppliers around the world and imports some of these aircraft and aircraft parts into Canada. Avmax qualifies as an entity that is subject to the Act.

Much of Avmax’s business is subject to Transport Canada regulation and oversight. Avmax’s supply chains are managed by personnel primarily in Calgary, Alberta.

Concerns about forced labour or child labour can be referred to Avmax by any of the following means:

- hr@avmax.com
- legal@avmax.com
- Dwayne Dupuis, Senior Vice President, Human Resources and Corporate Services, dwayne.dupuis@avmax.com or
- Bruce Nysetvold, Senior Legal Counsel, bruce.nysetvold@avmax.com

Avmax has also established a confidential whistleblower hotline administered by a third party that can be accessed at:

- 1-866-921-6714
- Avmax.group@integritycounts.ca,
- <https://www.integritycounts.ca/org/Avmax.Group>

POLICIES AND DUE DILIGENCE PROCESSES

In order to comply with the Act, Avmax has implemented additional safeguards in its Know Your Customer (“**KYC**”) surveys. Beginning in May, 2024 Avmax now asks all suppliers (regardless of their jurisdiction of origination):

- Do you or any of your suppliers employ persons under 18 years of age under circumstances that are dangerous, that prevent them from attending school, or that are otherwise contrary to the *Worst Forms of Child Labor Convention*, 1999, adopted at Geneva on June 17, 1999?
- Do you or any of your suppliers employ persons under circumstances contrary to the *Forced Labor Convention*, 1930, adopted in Geneva on June 28, 1930?

In addition, Avmax added the following representations and warranties to its Purchase Order and (“**PO**”) Replenishment Order (“**RO**”) contract templates and thus requires all suppliers to make such representations and warranties:

- Seller or any of the seller’s suppliers do not employ persons under 18 years of age under any circumstances that are dangerous, that prevent them from attending school, or that are otherwise contrary to the *Worst Forms of Child Labor Convention*, 1999, adopted at Geneva on June 17, 1999
- Seller or any of the seller’s suppliers do not employ persons under any circumstances contrary to the *Forced Labor Convention*, 1930, adopted in Geneva on June 28, 1930.

SUPPLY CHAIN SEGMENTS AT RISK

Avmax sources aircraft and aircraft parts from around the world and imports many of them to Canada. All goods purchased by Avmax relate to the aerospace industry and are governed by rigorous industry standards. Avmax requires its suppliers to declare their compliance with the *Worst Forms of Child Labor Convention*, 1999, adopted at Geneva on June 17, 1999, and the *Forced Labor Convention*, 1930, adopted in Geneva on June 28, 1930, and will not contract with any supplier that is unwilling or unable to make such a declaration.

REMEDIATION MEASURES

Avmax is confident that by requiring its suppliers to certify that they are compliant with the Act it has remediated the risks of forced labour and child labour in its supply chains. In addition, the manufacture of aircraft and aircraft parts is highly technical and subject to

tight governmental regulation in each jurisdiction of manufacture. Avmax therefore has no reason to believe that further remediation efforts are necessary.

TRAINING

Avmax trains its supply chain personnel to use approved KYC forms and approved PO and RO templates. Avmax also has annual training that highlights for employees the availability of the whistleblower hotline noted above.

EFFECTIVENESS ASSESSMENT

Avmax continues to monitor its compliance with the Act and to ensure that its KYC process includes measures to prevent forced labour and child labour in its supply chains. Avmax has discovered no reason to suspect that the Act is not being complied with in its supply chains.

ATTESTATION:

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 entity or entities 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.



Bruce Nysetvold

Senior Legal Counsel and Corporate Secretary

October 31, 2024

I have the authority to bind Avmax Group Inc., Avmax Aircraft Leasing Inc., and Avmax Aviation Services Inc.