



## **Modern Slavery Report** **September 1, 2023 – August 31, 2024** **SUMMIT AIR LTD. and SUMMIT AVIATION GROUP LTD.**

This Modern Slavery Report (the “**Report**”) is made on behalf of Summit Air Ltd. and Summit Aviation Group Ltd. (collectively, “**Summit**”, “we”, “us” or “our”). This Report addresses our most recent fiscal financial period from September 1, 2023 to August 31, 2024 (“**FY24**”) and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) the (“**Act**”) and the Modern Slavery Act 2015 (UK) (collectively the “**Legislation**”).

### **1. Introduction**

As a leading provider of air charter services, Summit recognizes the important role that we have in ensuring that our operations and projects, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced and child labour (as defined in the Legislation) in our supply chain. This Report sets out the steps we have taken during FY24 and the steps we plan to take in future years to prevent and reduce the risk that forced and child labour is used at any step in the production of goods in Canada and the United Kingdom or elsewhere or of goods imported into Canada or the United Kingdom.

### **2. Our Business**

Summit is a leading Canadian air operator that provides charter passenger and air cargo services in Canada and in the United Kingdom under UK Company Number FC032575. Summit’s supply chain includes manufacturers that supply aviation parts and technology to our organization. These materials and services are primarily sourced from Canadian, USA, United Kingdom and European manufacturers. On rare occasions we source materials from manufacturers and suppliers in other countries, excluding those countries Canada does not have trade agreements with or which the Canadian Government has imposed import restrictions upon.

Summit is a member of the Ledcor Group of Companies (“**Ledcor Group**”) and is subject to and adopts Ledcor Group’s corporate governance policies. Ledcor Group’s supply chain management strategy is centered on engagement with employees and external stakeholders, including third parties such as partners, suppliers, subcontractors, consultants, and representatives together with anyone working for them or acting on their behalf (including their employees, independent contractors, and agents and anyone in their supply chain) (collectively “**Business Partners**”). As discussed in further detail in Sections 3, 4 and 6 of this Report, Ledcor Group relies on input from stakeholders to identify and mitigate potential supply chain risks.

Further information about our businesses can be found on our websites at [www.ledcor.com](http://www.ledcor.com) and [www.flysummitair.com](http://www.flysummitair.com).

### **3. Our Policies**

#### **Policies**

At Summit, we are committed to strong governance and clear organizational policies that reflect our values, and we actively communicate these expectations across our organization and to our Business Partners. We do not tolerate any forms of forced labour and child labour.



We are committed to maintaining the highest standards of ethical conduct in all our dealings with employees, Business Partners, and other third parties, and in accordance with all legal and regulatory requirements. We continue to evolve and improve our approach, and we abide by all applicable laws, including those related to forced labour and child labour in the jurisdictions in which we operate. Our policies expressly state that we will not tolerate forced labour and child labour in any of our operations or by any Business Partners we engage.

To monitor this expectation, Ledcor Group has developed the following due diligence policies and processes applicable to employees across the Ledcor Group, including those at Summit and its Business partners:

- Employee Code of Conduct and Ethics
- Business Partner Code of Conduct
- Respect in the Workplace
- Diversity and Employment Equity
- Safety, Health and Wellness Policy

These policies and processes are binding on all members of the Ledcor Group. Summit's Board of Directors is the body responsible for implementing Ledcor Group's risk strategy. Where Summit engages in joint ventures or partnerships with third parties, we expect our partners to adhere to similar standards of ethical conduct. Joint venture entities may develop their own policies and practices specific to the project in which they are involved although where we exercise a controlling interest in an entity or project, we may take additional action to apply Ledcor Group policies or to develop standards for that entity or project that aim to ensure an equivalent level of protection.

### **Employee Code of Conduct & Ethics**

We are committed to the highest standards of integrity in all our activities and to always conducting ourselves in an open, ethical, and fair manner. Ledcor Group's Employee Code of Conduct & Ethics (the "**Employee Code**") is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, employees, independent contractors, and agents (collectively "**Representatives**") should always act lawfully, adhere to high ethical standards and act in the best interests of Ledcor, including Summit. The Employee Code requires our Representatives to comply with laws by including the following language:

#### **"COMPLIANCE WITH LAWS**

Representatives will comply with all laws and professional standards applicable to our business in the countries, provinces, states, cities, and local communities where we operate. If you have questions about specific laws, please contact Ledcor's Legal department."

Since 2024, the Employee Code includes the following additional language:



## **"FORCED AND CHILD LABOUR**

Ledcor recognizes that slavery and trafficking, in all forms, represent a violation of fundamental human rights and are prohibited by law. Ledcor does not tolerate the use of any form of child or forced labour, slavery, or human trafficking in any of its operations or facilities.

Ledcor recognizes the importance of implementing appropriate measures to mitigate the risk of slavery and human trafficking in its operations. The production, purchasing, importation or distribution of goods that in any way involve the use of human trafficking, slavery, indentured, forced or child labour ("modern slavery") is strictly prohibited. If employees become aware of or suspect any modern slavery activities by co-workers, clients, vendors or anyone else they encounter in the workplace, they must report this immediately to their manager, Human Resources, or Ledcor's Legal department."

### **Business Partner Code of Conduct**

Our Business Partner Code of Conduct (the "**Partner Code**") is an extension of the Employee Code and provides further guidance for our Business Partners. We expect our Business Partners to comply with all applicable legal requirements in the jurisdictions in which they operate by including this obligation in all Business Partner onboarding processes and contracts. We also request that:

- our Business Partners comply with our Partner Code and consistently monitor and enforce it in their own operations and supply chain; and
- in addition to a similar section on compliance with laws as exists in the Employee Code noted above, our Business Partners are specifically required to comply with the following regarding forced labour and child labour:

#### **"Forced And Child Labour**

Ledcor recognizes that slavery and trafficking, in all forms, represent a violation of fundamental human rights and are prohibited by law. Ledcor does not tolerate the use of any form of child or forced labour, slavery, or human trafficking in any of its operations or facilities.

Ledcor recognizes the importance of implementing appropriate measures to mitigate the risk of slavery and human trafficking in its operations, either directly or through its Business Partners. Ledcor is committed to sourcing products, labour and services from Business Partners with impeccable human rights records. Business Partners must not participate in the production, purchasing, importation or distribution of goods that in any way involve the use of human trafficking, slavery, indentured, forced or child labour ("**modern slavery**").

Ledcor's Business Partners are expected to have anti-modern slavery guidelines, policies and practices in place that are communicated throughout their organization, upheld by all levels



of management, and that are applied to their own supply chain activities.”

The Partner Code also sets forth our values and guiding principles. We use reasonable efforts to engage with Business Partners that are committed to these same principles and who commit to these standards as a condition of doing business with us. We are committed to reviewing our Partner Code on a regular basis to ensure that this policy is in line with current best practices.

### **Whistleblower Policy**

Within the Employee Code is our Whistleblower policy (in effect during the reporting year) which states the following:

#### **“Whistleblower**

We want you to report complaints or concerns about our business and operations including, but not limited to any accounting, audit, procurement, contract or other violation of this Code or other business practice or conduct that appears to be illegal, unethical, or improper (each a “**Violation**”).

Each complaint will be treated as confidential and the anonymity of the complainant, if requested, will be preserved to the fullest extent reasonably possible in light of Ledcor’s need to investigate the complaint, the requirements of applicable law and Ledcor policies. Retaliation against any Representative who has made a complaint in good faith regarding an alleged Violation, or who has cooperated in the investigation of such complaint, is prohibited.

It is the expectation that all Representatives will cooperate with any investigations regarding complaints related to alleged Violations.”

Additionally, the Partner Code, encourages our Business Partners in our supply chain to report complaints or concerns and contains specific language on how these parties can report. We provide multiple channels to report complaints or concerns such as reporting:

- to a Ledcor or Summit representative or Ledcor Legal Department;
- to Ledcor’s Ethics Officer; and
- anonymously to Ledcor’s Ethics Hotline.

### **Due Diligence**

We expect third parties with whom we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, if we have a concern about a Business Partner’s ability to meet our values expectations, we will take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

Furthermore, we embed specific language in our contracts and our purchase orders with Business Partners requiring compliance with all applicable laws and our policies concerning expectations of conduct and actions. As of FY25, we will include contractual language specifically affirming Business Partners’ compliance with laws related to forced labour and child labour.



#### 4. Assessing Our Risk

Summit acknowledges potential risks of forced labour and child labour that may exist in our supply chain.

With most of our Business Partners operating locally in Canada, the USA, the United Kingdom and Europe, our risk and exposure to forced labour and child labour continues to be minimized. Nevertheless, we remain committed to continuously evolving our approach to supply chain transparency.

To assess the risk of forced labour and child labour in our supply chain, Ledcor Group relies on relevant input from internal and external stakeholders, including employees and Business Partners, obtained through our vetting processes and grievance programs.

The Ledcor Group committed significant funds, time and effort in FY24 to the design of a Shared Procurement function and the purchase and implementation of a Procurement System (Coupa) to provide us with the tools and additional scrutiny to develop effective strategies to better identify, report and mitigate the risks of forced labour and child labour in our supply chains. As discussed in further detail in Section 5 of this Report, we anticipate this improved procurement system and process to be fully integrated in FY26.

#### 5. Our Commitments

Summit is committed to implementing strategies and processes to better identify and prevent the risks of forced and child labour within its operations and supply chains.

##### Steps to Prevent and Reduce Risks of Forced and Child Labour

Examples of steps we are taking to prevent and reduce risks of forced and child labour include:

- Implementing contractual clauses that require subcontractors and suppliers to comply with all laws in the jurisdictions in which they operate and which include, as of 2025, compliance with anti-forced and child labour laws.
- Implementing codes of conduct that cover compliance with laws and whistleblower policies as well as creating multiple channels to report complaints and concerns.
- In FY24, Ledcor Group senior leadership began exploring ways to improve its employee training programs, particularly as it relates to supply chain risks. In particular, Ledcor Group is exploring the possibility of including interactive training modules and improving assessment methods, which will be implemented in FY26.

##### Remediation Measures

Our Employee Code and our Whistleblower Policy require all Representatives of Summit to report actual or possible misconduct. Similarly, our Partner Code requires that our Business Partners report complaints and concerns about Summit's and/or its Business Partner's businesses and operations. We also will undertake diligence efforts (as further described in this Report) to ensure that the risk of forced and child labour is mitigated in our business. No instances of forced or child labour in our operations or supply chains were identified during the reporting period and, therefore, we did not take any measures to remediate any forced and child labour arising from such measures.

Although we are not currently aware of any forced and child labour in our business and supply chains, if we were to discover any forced and child labour in our business and supply chains, we would consider taking any or all of the following measures to immediately remediate such forced and child labour:





- Suspension or termination of a supplier, sub-supplier, or subcontractor.
- Take action to prevent forced and child labour and associated harms from reoccurring.

### Training

Every year, Summit employees at all levels are required to complete a mandatory certification process to ensure that our Employee Code is understood and properly applied to our activities. Every new employee of Summit must complete mandatory online training on our values and policies, including our Employee Code, and is informed of how to report wrongdoing under our Whistleblower Policy. We provide employees with ongoing and periodic training opportunities to ensure that all employees stay current on our expectations and the law.

### 6. Our Progress and Effectiveness

As part of our governance processes, we review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. To date, no concerns or complaints regarding forced and child labour in our supply chains have been identified. We also assess the effectiveness of our policies by reviewing all of the organizations' policies on a regular basis.

### 7. Approval & Signature

This Report was approved by the Board of Directors of Summit on May 30, 2025, and has been submitted to the Minister of Public Safety and Emergency Preparedness for Canada. This Report is also available on our company website at [www.flysummitair.com](http://www.flysummitair.com).

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the entities 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.

Name: Lane Zirnhelt

Title: Chief Operating Officer

I have the authority to bind Summit Air Ltd. and Summit Aviation Group Ltd.