



FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Summit Air Ltd.

Modern Slavery Report

September 1, 2024 – August 31, 2025



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1. ABOUT THIS REPORT

This Modern Slavery Report (the “**Report**”) is made on behalf of Summit Air Ltd. (collectively “**Summit**”, “we”, “us” or “our”).

This Report addresses Summit’s most recent fiscal financial period from September 1, 2024 to August 31, 2025 (“**FY25**”) and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “**Act**”).

As a leading provider of commercial passenger and cargo air charter services in Canada and the United Kingdom, Summit recognizes the important role it has in detecting and preventing instances of forced labour and child labour (as defined in the Act) in the supply chains integral to our operations and projects. This Report details the steps we have taken during FY25 and the steps we plan to take in future years to prevent and reduce the risk that forced labour and child labour is used at any step in the production of goods in Canada or elsewhere or of goods imported into Canada.

2. STRUCTURE, OPERATIONS, ACTIVITIES AND SUPPLY CHAINS

Structure, Activities, and Business:

Summit is a Canadian fixed wing air carrier that provides charter passenger and air cargo services in Canada and in the United Kingdom. Summit’s supply chain includes businesses that supply commercial aircraft, aviation-related parts and services and technological solutions. These materials and services are primarily sourced from suppliers based in Canada, the USA, the United Kingdom and western Europe. While Summit occasionally sources materials from suppliers in other countries, Summit tries not to order materials from suppliers based in countries that Canada does not have a trade agreement with. Summit does not do business with countries/regions, firms or individuals that are subject to Canadian Government import restrictions, including sanctions, anti-money laundering and other regulatory prohibitions.

As a member of the Ledcor Group (“**Ledcor Group**”), one of Canada’s largest construction companies, Summit 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, Leducor Group relies on input from stakeholders to identify and mitigate potential supply chain risks.

Further information about Summit and the Leducor Group can be found on our websites at www.flysummitair.com and www.ledcor.com.

Workforce Overview

As of August 31, 2025, Summit employed pilots, aircraft maintenance engineers and support staff for a total workforce of 300 employees.

Supply Chain Understanding (including direct and indirect suppliers)

Due to the nature of our business, Summit works with a large number of suppliers across many industries, but with a focus on suppliers operating in the aviation and aerospace sectors.

Examples of the suppliers and subcontractors we engage include businesses that provide: (i) new and used commercial aircraft, (ii) aircraft and component maintenance, repair and overhaul services, (ii) ground support equipment and vehicles; (iii) aircraft handling and resupply services (hangarage, provisioning, fuel, de-icing, etc.); and (iv) a wide array of software and other technological solutions.

These materials and services are primarily sourced from manufacturers in Canada, the United States, the United Kingdom and Europe, and while we acknowledge that no country is free from risk, these countries are ranked as low risk based on the Walk Free Global Slavery Index. As mentioned above, before purchasing goods and services, Summit first looks for any Canadian, UK or USA import restrictions, including but not limited to sanctions, anti-money laundering and other prohibitory regimes. In all cases, Summit prefers to deal with suppliers based in countries that have formal trade agreements with Canada. With regard to modern slavery, Canada's free trade agreements with the USA, UK and Europe contain prohibitions on the use of forced labour and the import of goods and services produced and provided using forced labour, child labour, etc.

Risk management governance

The identification, assessment, and response to forced and child labour risks is overseen by Leducor Group's Cross-Enterprise Modern Slavery Steering Committee (the "**Committee**"), which was established in FY25. Summit Legal is represented on the Committee. The Committee holds primary responsibility for coordinating modern-slavery-related activities across the Leducor Group's Operating Groups and Business Units, including Summit, ensuring a consistent enterprise-wide approach to risk management. The Committee's cross-functional representation



ensures that senior leaders have visibility into emerging risks, compliance obligations, and the effectiveness of the company's mitigation measures.

Information gathering

Ledcor Group gathers information to respond to legislative requirements through a structured internal consultation process. The Committee led this effort, engaging with key stakeholders across Procurement, Finance, Human Resources, Legal, Corporate Sustainability and Ledcor Group's Operating Groups. These stakeholders provided input on relevant policies, procedures, and risk assessments to advance compliance and transparency. In FY25, this collaborative approach enabled us to better align reporting with legislative obligations and identify potential opportunities for future actions.

3. POLICIES IN RELATION TO MODERN SLAVERY, FORCED LABOUR AND CHILD LABOUR

Ledcor Group's values are the bedrock of our company. These values shape our policies and how we do business.

Values:

Safety:	Zero accidents through best practices
Quality:	Continuous measurements and improvement
Integrity:	Ethical, honest, consistent, highly regarded
Sustainability:	Balancing People, Planet, and Profit
Success:	Client and employee satisfaction, shareholder value

Guiding Principles:

Collaborative:	Collaboration is what we are known for. We actively seek out and pursue opportunities to collaborate with our customers, clients, and colleagues in all business units.
Credible:	We strive to maintain unequaled credibility with our customers, clients, shareholders/employees and the communities in which we conduct business.
Ethical:	Our business will be conducted in an open, ethical, fair and forward-thinking manner.
Safe:	We are committed to always operating in a safe manner (including all our employees and anyone on our sites).
Sustainable	Ledcor Group is committed to integrating the principles of sustainability into our business operations. We continually encourage practices of sustainability to support our objective of responsible growth.



Accountable	We are proud to be part of Ledcor Group, with a sense of family, accountability, empowerment and ownership in our business.
Values Driven	We value quality, diversity, teamwork, creativity, open communication, continuous improvement and disciplined execution in all that we do.
Leadership	We attract and develop talented, energetic people by giving them challenging career options; providing inspiring leadership and giving access to opportunities and resources to continually develop their knowledge, expertise and skills so they can make a difference.
Brand Value	We actively promote and defend our brand as a company with diverse products and services to meet the needs of a diverse marketplace. We highly value our diversity while making it easy for our customers to do business with us.
Consistency	We strive for efficiency, simplicity and consistency by developing and implementing common processes and programs wherever possible.

At Ledcor Group and 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 are committed to maintaining the highest standards of ethical conduct in all our dealings with employees, Business Partners, and third parties. 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.

Internal operating policies

To monitor this expectation, Ledcor Group has developed the following due diligence policies and processes applicable to employees across the enterprise:

- Employee Code of Conduct & Ethics
- Prevention of Harassment and Violence Policy
- Inclusion and Diversity Statement
- Employment Equity Policy
- Health, Safety & Environment Policy

In addition to these policies, the Ledcor Group ensures that all employment offers are written in clear language to support worker understanding of their rights and obligations. Employees retain the unrestricted right to resign from their employment at any time and may initiate this process



independently through our employee platform, Workday. This approach reinforces our commitment to ensuring that employment with the Ledcor Group is freely chosen.

The Ledcor Group is implementing processes when engaging recruitment agencies to ensure that no forced labour, child labour, or other unethical recruitment practices are present in our hiring processes. Consistent with international labour standards, the Ledcor Group does not retain worker passports, identification or travel documents and requires all recruitment agencies acting on our behalf to confirm that they do the same. This safeguard ensures workers maintain personal control over their identity documents and are not subject to practices that could restrict their freedom of movement.

The Ledcor Group's Board of Directors is the body responsible for setting and implementing the enterprise risk strategy. These policies and processes are binding on all members of the Ledcor Group, including Summit. Where entities of the Ledcor Group engage in joint ventures or partnerships with third parties, it expects its 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 a project, we may take additional action to apply the Ledcor Group's policies or to develop standards for that project that aim to ensure an equivalent level of protection.

A. Employee Code of Conduct & Ethics

We are committed to the highest standards of integrity in all our activities and strive to conduct ourselves in an open, ethical, and fair manner. Our 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, the Ledcor Group employees, independent contractors, and agents (collectively "**Representatives**") should always act lawfully, adhere to high ethical standards and act in the best interests of the Ledcor Group.

All our employees are required to review and acknowledge the Code annually. The Employee Code requires our Representatives to comply with 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.

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 Legal department.

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 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.

Supplier policies

The Ledcor Group has a [Business Partner Code of Conduct](#) (the “**Partner Code**”) that is publicly available to our Business Partners on the Ledcor Group’s primary website.

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 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.



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:

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.

Reporting Violations

We want you to report complaints or concerns about Ledcor's and/or its Business Partner's business and operations including, but not limited to any accounting, audit, procurement, contract or other violation of this Business Partner Code or other business practice or conduct that appears to be illegal, unethical, or improper (each a "Violation").

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. Where a report is false and malicious, appropriate action will be taken against the reporting Business Partner.

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



The Partner Code requires Business Partners to report complaints or concerns and contains specific language on how these parties can report to the Ledcor Group. The Ledcor Group provides multiple channels to report complaints or concerns such as reporting:

- to a Ledcor Group representative or the Ledcor Legal Department;
- to the Ledcor Group's Ethics Officer; and
- anonymously to the Ledcor Group's Ethics Hotline.

We expect our Business Partners to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. We review our Partner Code on a regular basis to ensure that this policy is in line with current best practices.

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. Since FY24, we are including contractual language specifically affirming Business Partners' compliance with laws related to forced labour and child labour. New engagements and renewals are used as natural opportunities for adding terms expressly addressing the requirements of the Act.

Continuous improvement

People: Responsible governance is an essential step to helping prevent and reduce forced labour and child labour-related risks. As such, in FY25, we established the Committee to coordinate and oversee efforts to meet the ongoing requirements of the Act. This includes assessing and addressing forced labour and child labour-related risks in our operations and supply chain by, for example, recommending the establishment of new policies and processes and the enhancement of existing frameworks and measures. Bringing together representatives from across the Ledcor Group enables a comprehensive and coordinated approach to future initiatives, including our reporting obligations.

Process: As part of strengthening our contractual and governance framework, we have also updated our subcontractor purchase orders and agreement templates to ensure alignment and compliance with the Act within the subcontractors' own supply chains. A breach of any of these obligations will give us the right to terminate the applicable contract.

These planned steps reflect our ongoing commitment to implement additional protections against forced labour and child labour. Further policy updates will continue to be guided by risk assessment findings, legislative developments, and industry best practices.



4. RISK MANAGEMENT PROCESSES TO ADDRESS THE RISK OF MODERN SLAVERY, FORCED LABOUR AND CHILD LABOUR PRACTICES

Risk assessment frequency and governance

With the support of the Ledcor Group, we plan to conduct risk assessments of Summit's supply chain annually starting in FY26.

Identifying and assessing risks

With most of Summit's Business Partners operating in Canada, the USA, the United Kingdom and western Europe, our risk and exposure to forced labour and child labour continues to be low, based on the Global Slavery Index. Nevertheless, we remain committed to continuously evolving our approach to supply chain transparency when necessary.

To assess the risk of forced labour and child labour in our supply chain, the Ledcor Group relies on desk-based research (including the Global Slavery Index and Bureau of International Labor Affairs) and relevant input from internal and external stakeholders, including employees and Business Partners, obtained through our vetting processes.

The Ledcor Group will always consider improving or evolving its strategies and processes to better identify and prevent the risks of forced labour and child labour within its operations and supply chains.

Continuous improvement

The Ledcor Group continuously assesses how we can strengthen our approach to address any forced labour and child labour in our operations and supply chains. Beginning in FY24, we have made a series of strategic decisions to improve our focus on identifying and preventing potential risks. Each of the following decisions were the result of research, analysis and engagement with the Ledcor Group's senior leadership.

Additionally, we have and will continue to explore complementary tools to further strengthen our ability to assess supplier practices and expand our understanding of risk indicators across our supply chain.



5. DUE DILIGENCE PROCESSES AND MEASURES TAKEN TO REMEDIATE ANY FORCED LABOUR OR CHILD LABOUR

Prevention and mitigation

To mitigate the specific risks of forced labour and child labour in our supply chain, the Ledcor Group has implemented the following programs and initiatives:

- Distribution of a Temporary Foreign Workers Rights poster to temporary workers in Canada since October 2022. This poster informs foreign workers of their rights and protections while working in Canada.
- Established a Hiring Individuals Under the Age of 18 procedure in April 2015 emphasizing that individuals must be hired in accordance with jurisdictional labor legislation.

We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced labour and child labour is mitigated in our business.

Human rights due diligence approach

The Ledcor Group's Prevention of Harassment and Violence Policy prohibits discrimination against all protected groups and reinforces our commitment to maintaining a safe, respectful, and inclusive workplace. We respond promptly to any allegation of discrimination, undertaking investigations where necessary to ensure concerns are addressed thoroughly and appropriately. By upholding a workplace free from discrimination and ensuring that any reported issues are actively investigated, we help reduce the likelihood that marginalized or vulnerable groups experience unsafe conditions, coercion, or exploitation. These safeguards contribute to minimizing situations that could escalate into modern slavery risks and support our broader commitment to protecting the rights and well-being of all workers across our operations.

Grievance mechanisms

Our Employee Code requires all Representatives to report actual or possible misconduct. They can do this through their manager, their HR Business Partner, or through an anonymous Ethics hotline. Similarly, our Partner Code requires our Business Partners to report complaints and



concerns about the Ledcor Groups' and/or its own businesses and operations through an anonymous whistleblowing hotline.

Remediation policies and processes

Although Summit is not currently aware of any forced labour and child labour in our business and supply chains, if instances of forced or child labour are identified in our business or supply chains, we would take immediate and decisive action to remediate the situation. Actions may include:

- Suspension or termination of a Business Partner contract.
- Identifying root cause and implementing corrective measures to prevent recurrence.

Incidents of modern slavery

No instances of forced or child labour in Summit's operations or supply chains were identified during FY25 and, therefore, we did not take any remediation measures.

Summit did not identify any instances of forced or child labour in its activities and supply chains during FY25, and, as such, there is no loss of income to remediate.

6. TRAINING PROVIDED TO EMPLOYEES ON MODERN SLAVERY, FORCED LABOUR AND CHILD LABOUR

Internal and external training

Internal Training:

We provide employees with ongoing and periodic training opportunities to ensure that all employees stay current on our expectations and the law.

Internal training is mainly administered through the Workday application, which allows the Ledcor Group to monitor and confirm employee participation.

A. Employee Code of Conduct & Ethics

Every year, all Ledcor Group employees at all levels, including Summit and its employees, 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 Ledcor Group online training on our values and policies, including our Employee Code, and is informed of how to report wrongdoing under our Whistleblower section.



In FY25, 99.9656% of the Ledcor Group's employees completed the mandatory training. The completion rates among specific employee groups are as follows:

- Human Resources staff – 100%
- Executive-level staff – 100%
- Procurement staff – 100%
- Other staff (including frontline staff) – 99.9627%

B. Respect in the Workplace

In February 2025, the Ledcor Group delivered its Respect in the Workplace training to all employees. This training is designed to help employees foster and maintain a respectful work environment by presenting practical scenarios and knowledge tests that build awareness of how to recognize and report harassment and violence. New employees also receive this training as part of their onboarding to ensure consistent understanding of expected workplace behaviours from the outset.

The training was developed by an external organization (Frame & Associates), ensuring that the content reflects current best practices and acknowledges the diverse needs of our workforce. Through this training, we reinforce our commitment to creating safe and respectful workplaces, reducing vulnerabilities that could contribute to conditions associated with forced and child labour risks.

In FY25, 100% of the Ledcor Group's employees completed this training. The completion rates among specific employee groups are as follows

- Human Resources Staff – 100%
- Executive-level staff – 100%
- Procurement staff – 100%
- Other staff (including frontline staff) – 100%

Continuous improvement

In FY24, the Ledcor Group began exploring ways to improve its employee training programs, particularly as these programs relate to the risks of forced and child labour in supply chains. In FY26, we plan to introduce an interactive training module on our Employee Code, thereby improving its effectiveness.

Looking ahead, we also plan to introduce and implement tailored training for our procurement team who interact with suppliers to ensure their awareness and understanding of the Act. The training will include requirements of the Act, steps we are taking to improve compliance in our



supply chains, how to mitigate risks of forced labour or child labour when engaging with suppliers and the steps to take when non-compliance is suspected. Equipping our procurement team with this knowledge will lead to stronger due diligence across our organization.

7. ASSESSING THE EFFECTIVENESS OF THE ACTIONS TAKEN TO PREVENT AND RESPOND TO MODERN SLAVERY, FORCED LABOUR AND CHILD LABOUR

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 labour and child labour in our supply chains have been identified and we have not been the subject of any investigation or been convicted of any offence under any laws concerning forced labour and child labour. We also assess the effectiveness of our policies by reviewing policies annually.

Furthermore, the use of contractual language specifically addressing the issues of forced labour and child labour in supply chains has become standard practice in our new commercial agreements with Business Partners.

8. APPROVAL & SIGNATURE

This Report was approved by the Board of Directors of Summit Air Ltd. in accordance with section 11(4)(b)(ii) of the Act on 27 May 2026 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at 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 within this Report.

Lane Zirnhelt, Director and Chief Operating Officer

27 May 2026

I have the authority to bind Summit Air Ltd.