



# Wasaya Group Inc.'s Annual Report for the Fiscal Year ended December 31, 2023 on the Prevention and Reduction of Risks of Forced Labour or Child Labour

May 30, 2024

## Wasaya Group Inc.'s Structure, Activities, and Supply Chains

Wasaya Group Inc. ("Wasaya") and its subsidiaries are focused on operating in compliance with all applicable laws and in a socially responsible way. We strive to do business with suppliers who share these values and commitments. Wasaya's report is a joint report by Wasaya and the legal entities listed below which are controlled by Wasaya (collectively, the "Reporting Entities," "we" or "us"):

Wasaya General Partner Ltd.  
Wasaya Airways LP  
Wasaya Petroleum General Partner Ltd.  
Wasaya Petroleum LP  
Wasaya Airways Leasing Ltd.  
Wasaya Petroleum Leasing Ltd.

### *Organization, Structure and Activities*

Wasaya, incorporated in Ontario, is an air transportation provider to Northern Ontario. Wasaya's business plan is to be a provider of quality air services and its head office is located in Thunder Bay, Ontario, Canada. Wasaya strives for success and growth by focusing on the needs of its guests/customers, shareholders and employees, while supporting its communities and protecting the great lands.

### *Supply Chains*

The Reporting Entities rely on a supply chain primarily located in North America. The procurement team engages suppliers of all sizes. Wasaya has categorized its suppliers as strategic, core and other suppliers primarily based on spend and size. Goods and services purchased include fuel, aircraft parts, consumables (such as limited life parts), maintenance, and facility management.

## **Policies and Due Diligence Processes**

Each of Wasaya and the companies it controls are subject to a variety of policies, including the Wasaya Code of Ethics, which specifically addresses its commitment to compliance with all applicable laws in any jurisdiction in which it and its subsidiaries do business.

Wasaya has a framework in place to assess and address risks, mitigation strategies and reporting requirements as part of its control environment. Forming part of that framework is its due diligence and remediation processes, and policies that underpin those processes.

[Due diligence processes](#)

The following are key elements in the Reporting Entities' effort to prevent forced labour and child labour in their respective operations and supply chains:

- The Reporting Entities provided Wasaya's Supplier Certification - Modern Slavery to their strategic and core suppliers (identified as described above). This certification described forced labour and child labour consistent with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and required the supplier to certify the following:
  - o The supplier read and understood the certification;
  - o The supplier has and will maintain sufficient diligence in its operations and supply chains to identify the use of forced labour and child labour and will make such diligence information available upon request;
  - o The supplier will report any incidents of forced labour or child labour identified; and
  - o The supplier will also take appropriate remedial action if any instances of forced labour or child labour are identified.

Furthermore, the suppliers were asked to acknowledge that a Reporting Entity could terminate its business relationship with the supplier in the instance that the supplier provides false information or if the supplier were to breach any of the undertakings in the certification.

Wasaya sent out 21 certifications to strategic and core suppliers and achieved a 100% compliance rate.

### **Parts of Business and Supply Chain that Carry a Risk of Forced Labour and Child Labour**

No specific parts of the Reporting Entities' businesses or supply chains carry an increased risk of forced labour or child labour. The Reporting Entities operate in, and a majority of the Reporting Entities' suppliers are from, geographies that have modern slavery or similar regulations in place, thereby substantially mitigating geographic / country risk. Further, the Reporting Entities operate in industries that are highly regulated with sophisticated supply chains, further mitigating the risk of forced labour and child labour.

### **Remediation, if applicable**

Not applicable. We have not identified any forced labour or child labour in our activities or supply chains.

### **Remediation of Vulnerable Family Loss of Income, if applicable**

Not applicable. We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains.

### **Training of Employees**

Wasaya's management developed mandatory organization-wide internal web-based training for identified employees with procurement and/or finance responsibilities. The web-based training was developed by a related entity and was monitored for completion internally using a training platform. The length of the training was approximately one hour and covered both child labour and forced labour. 12 employees have completed the training to date, which represents 100% compliance for those assigned to the training.

### **Effectiveness**

In preparing this Report, Wasaya engaged a cross-functional working group with individuals responsible for the oversight of operations and procurement, legal, and finance across the businesses and related entities. Wasaya executive management team members with specific operational responsibility for the Reporting Entities were also asked to provide feedback on this Report prior to it being approved by Wasaya's Board of Directors.

Based on the procedures performed, including supplier certifications and additional diligence, as required, no child labour or forced labour has been identified in any Reporting Entities or any of their supply chains. We intend to continue monitoring for indicators of child labour or forced labour in our supply chain, including performing diligence on new vendors, performing additional diligence on existing vendors to the

extent we learn of material changes in their circumstances (e.g., a change of control; they utilize new sources in their supply chain, especially from locations with higher risk of child labour or forced labour); and including anti-child labour and forced labour representations in new material supply agreements with vendors.

**Approval**

This Report has been approved by Wasaya's Board of Directors pursuant to Section 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the 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 period listed above.

I have authority to bind Wasaya Group Inc.



Paul Disley, President/CEO, on behalf of Wasaya Group Inc.



Luke Reynolds, on behalf of the Board of Directors of Wasaya Group Inc.

May 30, 2024