

Executive Flight Centre LTD.

2025 Modern Slavery Report

Prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Financial Year Ended September 30, 2025

Executive Flight Centre LTD. has a zero-tolerance approach to modern slavery and is fully committed to preventing forced labour and child labour in our operations and supply chains.

1. Introduction

This Report is produced by Executive Flight Centre LTD. (“**EFC**”, the “**Company**”, “**our**” or “**we**”) for the financial year ending September 30, 2025 (the “Reporting Period”) and sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This Report constitutes the third annual report prepared by the Company pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. We place the utmost importance on acting with integrity, responsibly and in compliance with the law in the conduct of our business activities, towards our employees, customers and suppliers, and in all our interactions with the communities in which we operate. We expect the same of our business partners.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person of liberty and dignity for another’s gain. EFC has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operations and supply chain. As a company, we are committed to protecting our organization and all people at risk from exposure to slavery or human trafficking in our supply chain.

The Company underwent a transition in senior management during the reporting period, which affected the pace of implementation of certain initiatives identified in prior reports. The Company is committed to meaningfully advancing its compliance program during the 2025–2026 financial year, as described in this Report.

2. Structure, Activities and Supply Chains

2.1. Corporate Overview and Operations

EFC is a corporation based in Calgary, Alberta and founded in 1991. EFC operates out of 19 locations throughout Western Canada and is a Canadian business with approximately

460 employees as of September 30, 2025. EFC strives to create a diverse and inclusive culture everywhere it operates.

EFC’s product and service offerings include:

- Aviation fuel supply and distribution;
- Airport and aerodrome services, including customer service, ground handling, fueling and de-icing services;
- Hangar and warehousing services
- Aviation ground service equipment maintenance services; and
- Custom-built fuel systems.

EFC also participates in a joint venture with the Mikisew Group in Mikisew Landing LP, an entity based in Alberta, Canada that specializes in aerodrome operations management. Mikisew Landing LP follows the same steps to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada.

2.2. Supply Chain

All of EFC’s operations, employees and direct contractual relationships are located in Canada, which reduces jurisdictional risk compared with supply chains that traverse higher-risk geographies. EFC’s principal supply-chain categories and a high-level risk assessment of each, based on our methodology described in Section 4, are set out below.

Supply Chain Category	Risk Assessment
Aviation fuel	Low – major Canadian/international suppliers mostly with published human rights and modern slavery policies
Ground service equipment and parts	Low-to-Medium – primarily North American manufacturers; country-of-origin monitoring ongoing
Custom-built fuel system components	Low-to-Medium – specialized industrial goods; supplier screening applied
Indirect goods and services (IT, office supplies, uniforms)	Low – standard commercial market; anti-forced-labour clauses to be phased in

3. Policies and Due Diligence Processes

EFC has a number of internal policies in place to help us conduct our business in an ethical and transparent manner. We seek to embed responsible business conduct (RBC) into policies and management systems. These policies address issues such as ethical conduct, harassment and violence in the workplace, occupational health and safety, and airport security. These policies are

consistently being reviewed and adapted. In particular, we expect to update our internal policies over the current year.

3.1. Key Supplier Commitments

During the reporting period, EFC reviewed once again the published modern slavery, human rights or supplier conduct policies of its principal fuel and product suppliers. Relevant commitments of these suppliers include (i) prohibition on child labour, forced labour and the payment of recruitment fees by workers, and requiring compliance with laws on working hours, freedom of association and collective bargaining, and wages at or above national legal standards; (ii) inspiration from the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Declaration on the Rights of Indigenous Peoples and the UN Guiding Principles on Business and Human Rights; (iii) engagement of third-party consultants to conduct independent supply-chain risk assessment.

3.2. Code of Conduct / Code of Ethics

EFC's Code of Conduct continues to apply to all members of the EFC community, including the Board of Directors, management and employees at every level. It addresses ethical conduct in EFC's work environment, business practices and relationships with external stakeholders. The principles set out in the Code reflect EFC's belief that honesty and integrity foster a positive work environment that strengthens the confidence of all stakeholders.

In particular, the policy against harassment and violence in the workplace allows for the confidential reporting and denunciation of situations, so that employees know they can raise concerns about how they or their colleagues are being treated, or about company practices, without fear of reprisal.

3.3. Employment Policies

Our Human Resources Department is extremely diligent in its recruitment efforts. Our recruitment process is mainly internal, including identity and criminal record checks to ensure that employees are authorized to work in compliance with applicable provincial and federal legislation. EFC's Human Resources Department also oversees compliance with all applicable employment standards legislation, equity-in-hiring requirements, minimum wage rules and working-hour limits.

In addition, we occasionally hire students aged 16 and over, especially during the summer months, to work in our facilities and offices. These students are duly trained to perform their tasks. We also ensure that their work schedule does not interfere with their studies, and that their working conditions comply with applicable laws at all times.

EFC's Employment Handbook includes a Code of Ethics and provides reporting, investigation and documentation mechanisms for employees to report ethical or legal violations, including any concerns regarding forced labour or child labour.

3.4. Supplier Due Diligence

EFC continues to review the published modern slavery and human rights policies of its material suppliers. EFC's approach to supplier due diligence is being strengthened: the Company plans to draft and adopt a Code of Ethics specifically applicable to suppliers during the 2025–2026 financial year that explicitly prohibits forced labour and child labour and will be sent to targeted

suppliers for signature. EFC also intends to establish a confidential reporting channel through which suppliers and third parties may raise concerns.

3.5. Procurement and Contracting Practices

During the reporting period, EFC started a review of its standard contract templates with a view to introducing anti-forced-labour provisions. Implementation of anti-forced-labour clauses into supplier and service-provider contracts is a priority initiative planned for the 2025–2026 financial year.

4. Assessing and Managing Forced Labour and Child Labour Risks

EFC uses a risk-based approach to assess and manage its exposure to forced labour and child labour. The Company's methodology considers the following indicators when evaluating suppliers and business relationships:

- Country risk: whether a supplier is headquartered, or its manufacturing sites are located, in countries with a low score on the Corruption Perceptions Index or that are identified as at risk under the Global Slavery Index;
- Product or service category: whether goods or services fall within categories identified as higher risk by the International Labour Organization or similar bodies;
- Supplier tier: with primary focus on first-tier (direct) suppliers, while acknowledging that risks may exist further down the supply chain;
- Financial and operational importance of the supplier to EFC;
- Type of work performed (labour-intensive versus capital-intensive activities); and
- The supplier's existing human rights and labour policies and compliance track record.

The risk score derived from this methodology determines: (i) the level of additional due diligence required; (ii) the extent of ongoing monitoring; and (iii) the frequency of review. Suppliers assessed as higher risk will be required to attest to compliance with EFC's supplier conduct expectations.

4.1. Internal Workforce Risk

EFC assesses the risk of forced or child labour among its own workforce to be negligible. EFC recruits primarily through direct internal processes and our Human Resources Department oversees compliance with all applicable employment standards. Furthermore, our internal policies are regularly reassessed and updated to ensure that they remain fit for their purpose and evolve and improve in line with legislation, corporate priorities and values. This work has also been carried out again over the past year as part of our continuous process.

4.2. Supply Chain Risk

The predominant supply-chain activities of EFC relate to aviation fuel distribution and aviation services in Canada. Given that the majority of EFC's supply chain operates within Canada – where robust labour regulation, enforcement mechanisms and remediation pathways exist – the overall risk profile is assessed as low to moderate. EFC recognizes that indirect risk may arise through component parts, indirect goods (such as uniforms, office supplies and IT equipment) and subcontractors, and will continue to expand its monitoring accordingly.

5. Remediation Measures

During the reporting period, EFC identified no cases of forced labour or child labour in its operations or supply chains. EFC has not therefore been required to implement remediation measures.

The Company's Employment Handbook includes reporting, investigation and documentation mechanisms through which employees may raise ethical or legal concerns without fear of reprisal. Should any instance of forced or child labour be identified in future, EFC will work to develop and implement a corrective plan to address and remedy the situation, including consideration of measures to address income loss to affected vulnerable workers where relevant.

During the 2025–2026 financial year, EFC intends to establish a dedicated reporting channel to allow employees, suppliers and third parties to report any concerns related to forced or child labour on a confidential basis, without fear of reprisal.

6. Training

EFC recognizes that training is a key component of an effective forced-labour prevention program. All EFC employees receive orientation training at the time of hiring and ongoing training on company policies and procedures, including health and safety and applicable legal requirements.

EFC's 2024 report committed to providing training specifically addressing child and forced labour to targeted audiences during the reporting period. Due to a transition in senior management during the reporting period, this training was not implemented as planned. New management continues to review this commitment and is fully supportive of deploying a comprehensive training program in the 2025–2026 financial year.

7. Assessing Effectiveness

EFC has in place a number of measures – including its Code of Conduct, employment policies and supplier review process – intended to prevent and reduce the risk that forced labour or child labour is used in its activities and supply chains.

EFC's 2024 report noted that the Company had not yet taken steps to assess the effectiveness of its prevention measures and indicated an intent to do so at a later stage. However, we have not yet taken steps to evaluate the effectiveness of these actions.

We believe that the best option for our company will be to conduct a regular audit of the organization's policies and procedures relating to forced labour and child labour.

8. Conclusion

We recognize that respect for human rights is a fundamental corporate responsibility, as is acting diligently and responsibly in all our activities. We want to take the necessary actions to mobilize all suppliers in our supply chains to have a positive and sustainable social impact.

In conclusion, we are committed to continuing to monitor our company's supply chain to identify and control current and future risks. Based on this assessment, we will be in a better position to

put further actions in place in the coming financial year to ensure that we combat all forms of modern slavery.

9. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Executive Flight Centre Ltd. for the fiscal year ended September 30, 2025.

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.

I have the authority to bind Executive Flight Centre Ltd.

Per:  _____

Full Name: Ryan Albizzati

Title: President of Executive Flight Centre Ltd.

Date: May 30, 2026 _____