

Crown Aviation Holdings Inc.  
(the “Company”)

Modern Slavery Act Policy  
(adopted by the Board as of October 10, 2024)

**1. Purpose**

This Modern Slavery Policy (the “Policy”) establishes the Company’s strong stance against forced labor and child labor aligning with both legal obligations and our ethical values. The Company is committed to conducting business with the highest ethical standards and this Policy outlines our stance against forced labor (“modern slavery”) and the use of child laborers in compliance with international legislation.

**2. Scope**

This Policy applies to all employees, contractors, suppliers, and business partners of the Company and its subsidiaries, regardless of their location.

**3. Our Commitment**

The Company is committed to acting with integrity in all our business dealings and to implementing and enforcing effective systems to ensure that modern slavery and human trafficking do not take place anywhere within our operations or supply chain. We also prohibit the use of child labor and demand compliance with all applicable international standards on this issue.

**4. Definition of Modern Slavery**

Modern slavery encompasses slavery, servitude, forced and compulsory labor, and human trafficking. These practices deprive individuals of their liberty for the personal or commercial gain of others.

**5. Supplier Expectations**

We expect our suppliers and business partners to uphold these same high standards by:

- Ensuring no use of forced labor, including bonded or involuntary prison labor, within their operations.
- Prohibiting child labor, with compliance to the International Labour Organization (“ILO”) minimum age standards.
- Upholding safe and humane working conditions, including fair wages, working hours, and respecting workers’ rights to join labor unions or other worker representative organizations.
- Conducting due diligence to assess risks of modern slavery in their own supply chains.

## 6. Due Diligence Process

The Company is committed to taking steps to identify, assess, and address modern slavery risks, including, but not limited to:

- Conducting risk assessments of our supply chain to evaluate potential areas of risk,
- Including clauses in contracts with suppliers and business partners that reflect our zero-tolerance stance on modern slavery and child labor,
- Engaging in supplier audits and monitoring compliance where necessary, and
- Providing training to staff on identifying and preventing modern slavery in supply chains.

## 7. Reporting and Whistleblowing

We encourage all employees, contractors, suppliers, and other business partners to report any concerns regarding potential or suspected instances of modern slavery or child labor. Reports can be made in accordance with our confidential whistleblower Policy or other designated reporting mechanisms and will be taken seriously and investigated thoroughly.

## 8. Accountability and Continuous Improvement

The Company will review this Policy annually to ensure its continued relevance and effectiveness and will take corrective action if any instances of modern slavery or child labor are identified in our operations or supply chain, up to and including terminating relationships with offending suppliers and notifying the authorities as such instances may be, among many other things, criminal in their nature.

## 9. Governance

The Company, its executive team and Board of Directors is responsible for ensuring the implementation of this Policy and its application to the business and affairs of the Company. As such, all employees and partners must comply with this Policy and in doing so uphold our commitment to ethical business practices without limitation of any kind or in any way whatsoever.

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Crown Aviation Holdings Inc. | A growth by acquisition company