

Human Rights Policy

Introduction

At NTA, respect for human rights is fundamental to the way we do business and is part of our core values across all of our business activities and operations. Consistent with that commitment, we have chosen to adopt this Human Rights Policy at the highest level of our Company.

Consistent with the framework established by the United Nations Guiding Principles on Business and Human Rights, governments owe a duty to protect human rights, and business has a duty to respect human rights.

This policy and our approach to fulfilling our commitment to respect human rights are uniquely our own. In its development, we have drawn upon a wide variety of resources to guide us. Those resources include, but are not limited to, consultation with relevant internal and external stakeholders and consideration of certain international instruments such as the United Nations Universal Declaration of Human Rights.

Our commitment to respect human rights begins with our commitment to comply with applicable national law. As per our commitment to Indigenous rights, we respect the rights and diversity of Indigenous Peoples, acknowledging the unique and important interests that they have in land, water, and environment as well as their history, culture, and traditional ways. We seek to ensure that NTA's presence fosters sound relationships and NTA respects and supports the dignity, wellbeing and human rights of its employees, their families, and the communities in which we operate.

We have developed policies that we rely upon to fulfill our commitment to comply with applicable national law and that respect our core values. These policies and practices also serve to operationalize our commitment to respect human rights, and they reflect that commitment. Finally, they provide guidance to our workforce, customers, business partners and other external stakeholders on the extent of our responsibilities and commitments, as well as our expectations from them.

Application

This policy applies to all employees, officers, and directors of NTA.

Our Workforce

We respect the human rights of our workforce. At NTA, we rely on and value the talents, ideas, diversity and commitment of our employees and other stakeholders to deliver outstanding service to our customers. Central to our relationship is the principle of mutual respect, which should be present in everything we do. We also value dialogue and engagement as part of this relationship. NTA prohibits all types of unlawful discrimination, including harassment, whether directed against an individual or group, including employees, customers, and shareholders. This specifically includes discrimination based on any status protected by law, including race, national or ethnic origin, colour, religion, age, sex (including pregnancy or childbirth), sexual orientation, gender characteristics, identity or expression, marital status, family status, physical or mental disability or a conviction for which a pardon has been granted (all of which are subject to any exceptions provided by law).



Our Operations

We commit to respecting human rights as an aviation service provider. As an airline, we operate in a highly regulated environment. Compliance with those regulations is paramount. Within the context of that regulatory environment, we have put into place policies and processes to assess actions we take in connection with the delivery of airline services that offer us a better understanding of our business relationships and provide good governance. These policies and processes also help us to identify relevant risks, including material human rights, Indigenous, social, environmental, climate change and health and safety risks.

Our Business Partners

We are committed to respecting human rights as a business partner. We have a large and diverse network of suppliers, customers, business partners and other external stakeholders, and recognize the critical roles they play to help us to fulfill our commitment to respect human rights. We also recognize that each entity in that network bears its own responsibility to undertake efforts to address human rights issues. To that end, we are committed to working with them in connection with their own efforts on this subject.

Our Communities

Our goal has always been to help create a better life for people in the communities where we operate.

We strive to be a contributing member of the communities where we operate. We are dedicated to investing in our communities and supporting important community projects.

We have an environmental footprint and recognize the need for meaningful environmental policies and programs to help protect the planet. We strive to work independently and in collaboration with stakeholders on a range of initiatives aimed at reducing the environmental impacts of our business and promoting responsible actions.

Modern Slavery

Modern slavery can take various forms, such as slavery, debt bondage, servitude, forced and compulsory labour, child labour, deceptive labour recruiting, and human trafficking. Modern slavery is a tragic global phenomenon that we all must work together to eradicate. It is contrary to good business and destroys lives and communities.

We do not tolerate modern slavery in any form.

As part of our efforts to fulfill our commitment to respect the human rights of our stakeholders, we reference a wide variety of internal guides, policies and governance documents which include, but are not limited to, the following: Code of Conduct/Ethics, Anti-Discrimination & Harassment Policy, Diversity and Inclusion Policy, Anti-Bribery and Corruption Policy, Anti-Money Laundering Policy, Supplier Code of Conduct, Environmental Policy.

Concerns

We encourage stakeholders to raise issues they see as concerns, including reporting activities they suspect may contravene the intentions we express in this policy. There exist a variety of mechanisms available to address concerns in this area. In addition to those offered by governments through various regulatory structures, we have also developed our own mechanisms that enable employees, business partners and other stakeholders to raise concerns, including concerns arising out of human rights impacts. These mechanisms are listed



in our Whistleblower Policy and Procedures and include a wide variety of complaint and escalation mechanisms. Employees can use internal support mechanisms to raise concerns and get them resolved.

NTA will protect from retaliation any party who raises legitimate concerns in good faith. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to continuously improve our efforts and recognize that our commitment to human rights is an evolving process.

To raise any concerns, please contact the Compliance Department at dispatch@ntair.ca