



**HEICO CORPORATION**

**CONSOLIDATED ANNUAL REPORT PURSUANT  
TO CANADA'S FIGHTING AGAINST FORCED  
LABOUR AND CHILD LABOUR IN SUPPLY  
CHAINS ACT**

**Dated May 31, 2024 for Fiscal Year 2023**

**1. What steps has the entity taken in the previous financial year 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 by the entity or of goods imported into Canada by the entity?**

- ✓ Mapping activities
- ✓ Mapping supply chains
- ✓ Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- ✓ Developing and implementing an action plan for addressing forced labour and/or child labour
- ✓ Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- ✓ Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- ✓ Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- ✓ Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- ✓ Monitoring suppliers
- ✓ Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

**2. Please provide additional information describing the steps taken (if applicable).**

At HEICO Corporation (including each of its subsidiaries), labor and human rights are a top priority, and those who work at or with HEICO Corporation are treated equally and with respect and dignity. We explicitly prohibit human trafficking, unlawful child labor, and involuntary labor.

HEICO Corporation is committed to adherence with all applicable laws, and requires and otherwise expects that each person or entity with whom HEICO Corporation does business also do the same. In each appropriate instance, HEICO Corporation expects and encourages that those with whom it does business agree to also abide by certain other guidelines and principles, including the UN Guiding Principles on Business and Human Rights.

As an example, HEICO Corporation's work in the United States is subject to compliance with regulations set by the Department of Labor's Occupational Safety and Health Administration, which includes adherence to requirements on minimum employment ages, and restricts the work which may be performed by certain workers under the age of 19.

HEICO Corporation also has a Policy Against Human Trafficking which expressly prohibits the company, its subcontractors, vendors, suppliers, or others doing business with HEICO Corporation from engaging any form of human trafficking, or any other unethical activities in their recruitment,

hiring, or employment practices such as such the use of forced labor, or engaging in misleading or fraudulent practices in the recruitment of candidates.

**3. Which of the listed options accurately describes the entity’s structure?**

Corporations

**4. Which of the listed options accurately describes the entity’s activities?**

- ✓ Producing goods (including manufacturing, extracting, growing and processing)
  - in Canada
  - outside Canada
- ✓ Selling goods
  - in Canada
  - outside Canada
- ✓ Distributing goods
  - in Canada
  - outside Canada
- ✓ Importing into Canada goods produced outside Canada
- ✓ Controlling an entity engaged in producing, selling or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

**5. Please provide additional information on the entity’s structure, activities and supply chains.**

Structure: HEICO Corporation through its subsidiaries is a manufacturer of Federal Aviation Administration (“FAA”)-approved jet engine and aircraft component replacement parts. HEICO Corporation also manufacturers various types of electronic equipment for the aviation, defense, space, medical, telecommunications and electronics industries. Connect Tech is a hardware design and manufacturing company specializing in rugged, small form factor solutions.

Activities: We market our products and services to approximately 125 countries. Our Flight Support Group designs and manufactures jet engine and aircraft component replacement parts and also repairs, overhauls and distributes jet engine and aircraft components. Our Electronic Technologies Group designs and manufactures various types of electronic, data and microwave, and electro-optical equipment products. Connect Tech is part of HEICO Corporation’s Electronic Technologies Group.

Supply Chain: We purchase a variety of raw materials, primarily consisting of high temperature alloy sheet metal and castings, forgings, pre-plated metals, electrical components and advanced composite materials from various vendors.

**6. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?**

Yes

**6.1 If yes, which elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour?**

- ✓ Embedding responsible business conduct into policies and management systems
- ✓ Identifying and assessing adverse impacts in operations, supply chains and business relationships
- ✓ Providing for or cooperating in remediation when appropriate

**7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable).**

In addition to the other responses, HEICO Corporation has a robust human resources department that reviews each new hire to ensure, among other things, that they have appropriate work authorizations and are of a legal age to accept work.

HEICO Corporation routinely conducts supplier/vendor reviews, which includes business and financial investigations. As stated in [HEICO Corporation's Code of Business Conduct](#), ethical conduct and integrity is fundamental to who we are as a company. HEICO Corporation expects ethical conduct of all who may be involved in the production of goods manufactured, assembled, distributed, sold, or used in HEICO Corporation's business operations. Many of HEICO Corporation's customers and vendors require that we certify or agree to abide by contractual provisions or the customer/vendor's own codes of conduct, which often include provisions related to complying with applicable law regarding child and forced labor.

Some HEICO Corporation subsidiaries are required to comply with aspects of the U.S. Federal Acquisition Regulations (FAR) or Defense Federal Acquisition Regulation Supplement (DFARS). FAR/DFARS provisions which many HEICO Corporation subsidiaries regularly certify compliance with include prohibitions on the use and/or purchase products mined, produced, or manufactured with forced or child labor. HEICO Corporation subsidiaries are often required to make a good faith effort to ensure that no forced or child labor was used in its end products.

**8. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

- ✓ Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

**8.1 If yes, has the entity identified forced labour or child labour risks related to any aspects of its activities and supply chains?**

- ✓ The sector or industry it operates in

**9. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the listed sectors and industries?**

- ✓ None of the listed options

**10. Please provide additional information on the parts of the entity’s activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable).**

HEICO Corporation has adopted a [Responsible Mineral Sourcing Policy](#) which specifically aims to ensure that HEICO Corporation’s sourcing of minerals is done “in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain.” HEICO Corporation commits to identify and mitigate risks in our supply chain from the sourcing of relevant minerals, which includes a principal area of risk for forced and child labor in our supply chain.

This policy makes clear that HEICO Corporation does not directly source conflict minerals from mines, smelters or refiners, and is in most cases several or more levels removed from the Democratic Republic of the Congo (“DRC”) or any other conflict-affected and high-risk areas (“CAHRAs”) worldwide. Further, HEICO Corporation expects its suppliers who supply or manufacture components, parts or products containing conflict minerals to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict. Without limiting the foregoing, suppliers are expected to directly and indirectly source conflict minerals only from sources that do not directly or indirectly support armed conflict in the DRC or other CAHRA.

Additionally, HEICO Corporation Team Members are expected and encouraged to promptly report alleged illegal or unethical behavior within the company or with respect to business dealings with any customer or suppliers.

**11. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

- ✓ Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

**12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable).**

See previous responses

**13. Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?**

- ✓ 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 and supply chains.

**14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable).**

Not applicable

**15. Does the entity currently provide training to employees on forced labour and/or child labour?**

No

**16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).**

Not applicable

**17. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?**

Yes

**17.1 If yes, what method does the entity use to assess its effectiveness?**

- ✓ Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- ✓ In certain circumstances, obtaining supplier acknowledgements regarding adherence to organizational policies and procedures

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable).**

N/A

**Approval and Signing for the Canadian Fighting Against Forced Labour and Child  
Labour in Supply Chains Act**

**Governing Body Approval.**

This report was approved by the Finance/Audit Committee of HEICO Corporation, the control company for the entities listed in this report pursuant to Section 9 of the Act.



Name: Frank Schwitter

Title: Committee Chair and Member, HEICO Corporation Finance/Audit Committee

Date: 05/28/2024

**Signature of Member of Governing Body.**

In accordance with the requirements of the Act, and in particular section 11(4)(b)(ii) 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 year listed above.



I have the authority to bind HEICO Corporation with respect to this Report.

Name: Frank Schwitter

Title: Committee Chair and Member, HEICO Corporation Finance/Audit Committee

Date: 05/28/2024