



StarFlight
AUSTRALIA



Modern Slavery Statement

2020-2021

Our Values

Safety	We prioritise our safety and that of our customers, our partners and our communities above all else, and we embrace safety continuous improvements to our assets, our systems and our processes.
Respect	We uphold the dignity and rights of those inside and outside of StarFlight, and have regard for their views, well-being and dignity.
Dependability	We make and keep realistic promises, and we step up to help those in need.
Courage	We willingly confront challenging and difficult situations to deliver our commitments and provide critical aviation services and care.
Integrity	We follow our principles, no matter the situation, and we share an uncompromising commitment to honest interactions.

1 About StarFlight

StarFlight Australia Pty Ltd and StarFlight Victoria Pty Ltd (“StarFlight” or “Company”) are fully integrated service providers of law enforcement, search and rescue (SAR) and emergency response aviation services. StarFlight was established by two iconic Australian organisations, LifeFlight Australia (LifeFlight) and Fox Aircraft Services, part of the Linfox Group. StarFlight Australia and StarFlight Victoria share a common Board of Directors.

StarFlight is committed to treating its workers, suppliers and joint venture owners with dignity and respect, ensuring safe working conditions and conducting environmentally responsible, ethical operations. Our commitment reflects the Company’s dedication to the highest air transport safety standards in the world, to realise our Vision and Mission.

Our Vision

Deliver aviation solutions for law enforcement, defence and emergency response services, that save lives.

Our Mission

Provide tailor-made solutions for complex aviation challenges across Australia.

This Statement is made on behalf of StarFlight Australia Pty Ltd (ABN 67606170414) and its affiliate StarFlight Victoria Pty Ltd (ABN 96623868315), under the Modern Slavery Act 2018 (Cth). It covers the financial year from 1 July 2020 to 30 June 2021 and is StarFlight’s first Statement under the Act.

This Statement is made voluntarily. It sets out the actions taken by StarFlight during the period to establish systems and internal awareness to prevent, detect and respond to modern slavery within our business and supply chains.

Throughout this Statement we refer to ‘Modern Slavery’ which includes slavery, servitude, forced or compulsory labour and human trafficking. Where the Statement refers to ‘we’, ‘us’ and ‘our’, it is a reference to StarFlight.

StarFlight does not tolerate any forms of slavery and human trafficking in our business or supply chain.

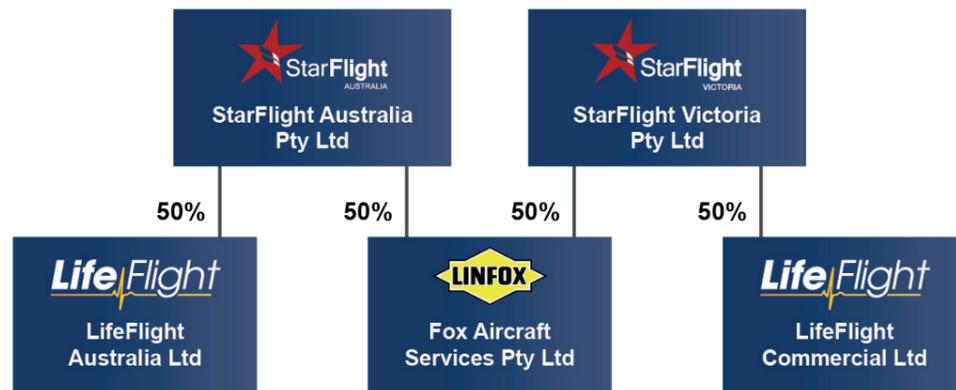
2 Our structure and our operations

StarFlight provides law enforcement, search and rescue and emergency response aviation services in Australia.

StarFlight is a company domiciled in Australia and owned equally by Shareholders LifeFlight and Fox Aircraft Services. StarFlight Australia is owned equally by LifeFlight Australia Limited (ABN 45010316462) and Fox Aircraft Services Pty Ltd (ABN 85627090813), part of the Linfox Group of Companies. StarFlight Victoria is owned equally by LifeFlight Commercial Limited (ABN 91627081930) and Fox Aircraft Services. StarFlight brings together the aviation experience, expertise and infrastructure of the LifeFlight companies and the unequalled aviation logistics supply and support capability of the Linfox Group.

StarFlight has neither partially nor wholly-owned subsidiaries.

StarFlight Australia Company Structure

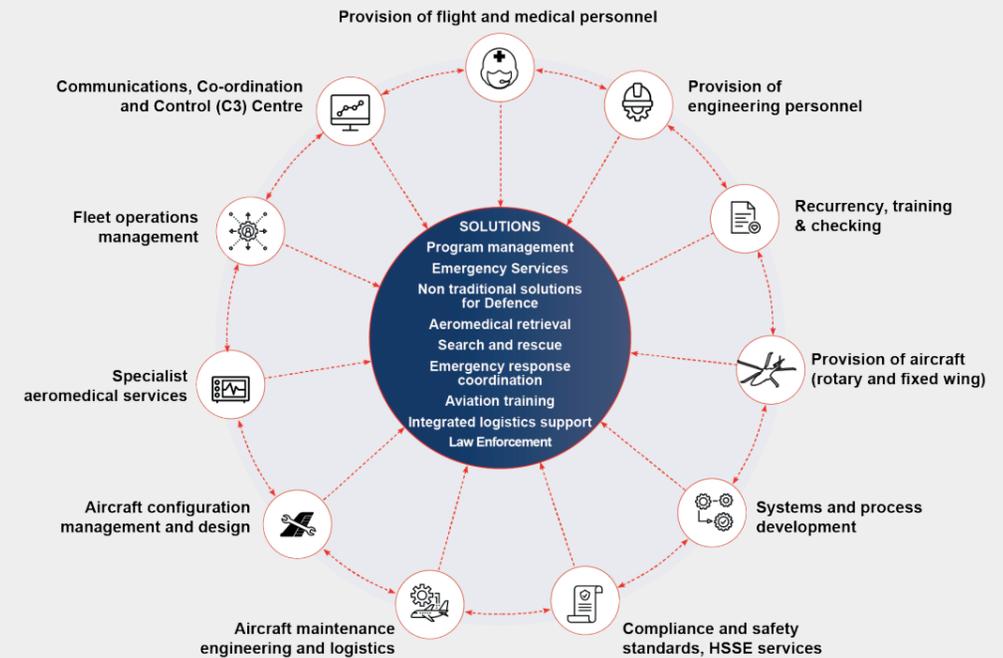


Founded in 2017 to deliver high-end aviation solutions, StarFlight, through a master supplier agreement with LifeFlight, employs some of the most qualified aviation and logistics professionals in the world including flight crews, engineering personnel, safety and systems specialists and program managers.

StarFlight's head office is located in Brisbane, with access to an extensive fleet of helicopters and fixed wing aircraft from nine established bases on the east coast of Australia.

The company draws on LifeFlight's nationally-recognised expertise as a leader in 24/7 rapid response helicopter and fixed wing support for emergency response services, providing specially configured aircraft, missions systems and engineering and maintenance support to the Victoria Police Air Wing (VICPOL) as well as access to a training academy for pilot and air crews.

Through a master supplier agreement with LifeFlight, StarFlight's capabilities, and its access to assets and bases, are shown in the following diagrams.



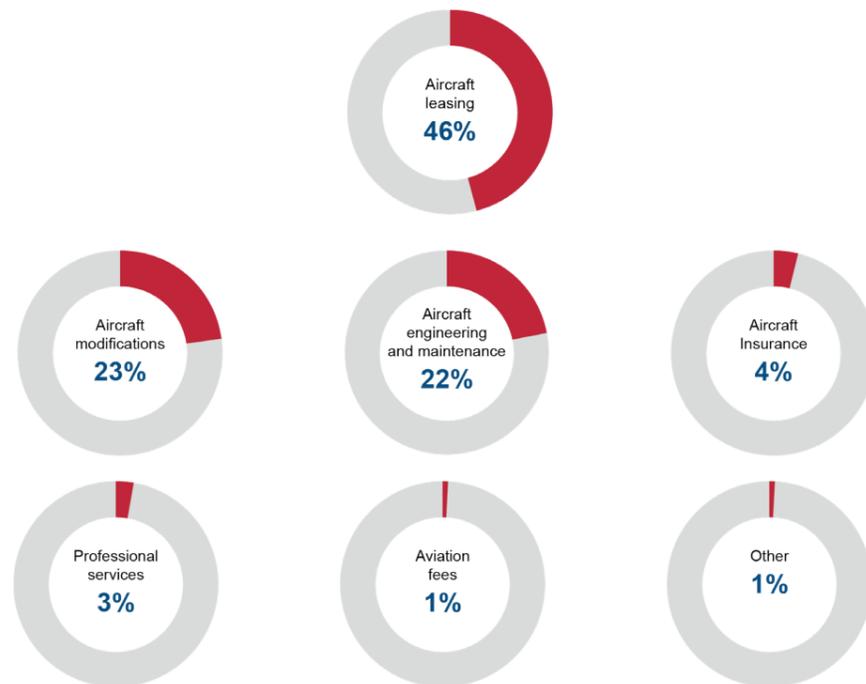
Serving Australia, StarFlight is a private company with a strong community focus. Fifty percent of all StarFlight profits are directed back into LifeFlight Australia to fund its emergency aeromedical rescue and retrieval services to communities in Australia.

3 Understanding our supply chain

Our value chain consists of suppliers who provide services directly to StarFlight such as the leasing of specialist helicopters, aircraft modifications, aircraft mission systems, surveillance technologies, aviation engineering and maintenance, and flight training.

StarFlight's 2020-2021 spend profile by supply category is shown in the following diagram. Aircraft leasing is the single largest supply category, representing 45% of the company's total spend in the past 12 months. Aircraft modifications, such as specialist aircraft fit outs for defence operations, is the second largest supply category at 23%, and aviation engineering and maintenance is third highest at 22%.

Percentage 2020-2021 spend by contract categories



StarFlight had five Tier 1 and Tier 2 suppliers in 2020-2021. Tier 1 suppliers are defined as those who provide the highest proportion (by value) of engineering, assets, logistics and corporate services annually; Tier 2 suppliers provide the second highest proportion (by value) of goods and services annually. The single largest contract category is aircraft leasing, through an Australian based leasing organisation. However, reflecting the spirit of the Modern Slavery Act, and for the purposes of this Statement, we have included the international aircraft manufacturer in our reporting and due diligence processes. Aircraft manufacturer Leonardo Company is also identified as provider of engineering and maintenance services to StarFlight. All five Tier 1 and Tier 2 suppliers have in place published Modern Slavery Statements applicable to their jurisdictions and governing their procurement of goods and services.

Tier 1 supplier

1. **GE Capital Aviation Services Australia** – is part of the largest commercial aviation financing and leasing company in the world, through which StarFlight leases rotary wing aircraft. General Electric (GE) Company has a published Modern Slavery Statement under the Australian Commonwealth Modern Slavery Act 2012. (www.ge.com)

Tier 2 suppliers

2. **Leonardo Company** – designs, builds and maintains high performance commercial aircraft, at operations based in Italy. The company supplies aircraft services direct to StarFlight, and is the manufacturer of a number of helicopters in LifeFlight's fleet. Leonardo has a published Modern Slavery Statement commensurate with European laws. (www.leonardocompany.com)
3. **LifeFlight Australia** – one of the world's leading aeromedical and retrieval companies and joint owner of StarFlight. LifeFlight provides aircraft engineering and maintenance, flying operations training checking services, flying operations support services, HSSE support and professional services to StarFlight. LifeFlight has a published Modern Slavery Statement under the Modern Slavery Act 2018 (Cth). (www.lifeflight.com.au)
4. **Pratt & Whitney** – is a Canada-based aircraft engine manufacturer that provides aircraft engine maintenance for StarFlight. Pratt & Whitney's parent company Raytheon Systems Ltd has a published Modern Slavery Statement under UK modern slavery legislation. (www.raytheon.com)
5. **Helimods** – provides all aircraft modification requirements and missions systems for StarFlight. It designs, manufactures, installs and supports a range of law enforcement, emergency medical, search and rescue and tactical mission system aircraft configurations. Helimods is based in Caloundra, Queensland (www.helimods.com)



4 Our position on Modern Slavery

StarFlight is committed to safe workplaces and to limiting the risk of modern slavery within our business and supply chain.

The company seeks to do business only with those suppliers and partners, regardless of their global location, that have similar values, ethics and sustainable business practices, including a commitment to eliminating modern slavery and upholding human rights.

StarFlight is committed to modelling our own values in the way we work (as shown below) and also in the way we work with our partners and suppliers to prevent or eradicate modern slavery practices in their operations and supply chains.



Our Non-Negotiable Principles

To ensure that we align our risk management activities with the company's values, StarFlight refers to overarching Non-Negotiable Principles in its Risk Framework. These principles help to set StarFlight's expectations not just for what work needs to be delivered, but how we expect business to be conducted. They are:

- we are committed to safety as our first priority
- we comply with laws and regulations
- we treat people with respect
- we act with honesty and integrity, upholding ethical standards
- we are committed to true and fair financial reporting
- we are committed to environmental sustainability
- we have a responsibility to safeguard LifeFlight's reputation, brand, property, assets and information
- we proactively manage risk

5 Potential risks within our operations and supply chain

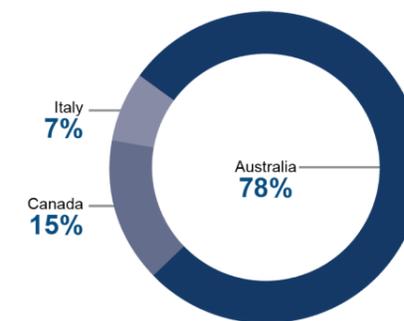
During 2020-2021, StarFlight assessed its potential supplier risks across its highest spend categories (Tier 1 and Tier 2 suppliers were reviewed and prioritised).

Potential risks for modern slavery were assessed according to:

- geographic location of services and suppliers
- industry sector
- product or service

Geographic location of services and suppliers

All StarFlight's workforce is employed in Australia. In addition, where StarFlight accesses the specialists of LifeFlight, they are sourced from existing Australian workforces. Almost 80% of StarFlight's supply spend is within Australia. The single largest category by percentage of supply spend is aircraft leasing, through Australian based leasing organisations.



The second largest category is aircraft modifications for the defence force, performed by aircraft manufacturer Leonardo Company in Italy and Australian company Helimods.

StarFlight's aircraft engineering and maintenance services (the third largest percentage spend by supplier category) are provided by LifeFlight Australia and Canadian aircraft engine manufacturer Pratt & Whitney.



Industry sector and product or service

As a leading aviation and emergency services provider, StarFlight operates under a Quality Management System which is accredited with the provision of International Standard ISO 9001: 2015. StarFlight endeavours to continually improve services which meet or exceed this International Standard, in addition to all relevant Australian Standards.

This Quality Assurance requirement on aviation manufacture, engineering, parts and maintenance support, requires highly skilled service provision. Products and services are subject to regular internal and independent reviews, inspections and tests to verify that safety and quality assurance requirements have been met. This is done before aircraft are released or services are delivered and is a continuous process to ensure quality improvement as well as compliance.

StarFlight considers that because our suppliers deliver professional high-end equipment and proprietary technology and services, that must meet the same international quality management systems, they pose a low risk to StarFlight from modern slavery practices.

Such practices include (but are not limited to) reliance on unskilled labour, exploitation of female, seasonal and child workers, underpayment of wages, or excessive working hours.

Nonetheless, we appreciate that our relationship with suppliers could, in turn, impact how we might cause, contribute or be associated with the risk of modern slavery practices.

As such, StarFlight's Risk Assessment Framework, through its master supplier agreement with LifeFlight has been updated to incorporate Modern Slavery risks. A new Modern Slavery Risk Management Plan and Modern Slavery Partner and Supplier Questionnaire will assist in identifying modern slavery risks in our own operations and in our supply chain. A Modern Slavery Working Group will oversee the monitoring and review of modern slavery risks. Causes and controls will be identified in the Corporate Risk Register for quarterly review by the StarFlight Management Committee.

Further, the StarFlight Code of Conduct and the Contracting and Procurement Policy have been updated to help staff (and where appropriate, partners and customers) to proactively recognise any part of the supply chain that may be vulnerable to Modern Slavery risk, to avoid any exposure by StarFlight (and our Shareholders and customers) to modern slavery practices.

The company's risk assessment recognises that the legal and reputational consequence of any Modern Slavery practice in our supply chain is a serious matter.

6 Actions Taken in 2020-2021

StarFlight has updated its Code of Conduct to reflect the company's expectations of staff, contractors and partners with regard to Modern Slavery and other human rights matters, unethical or illegal conduct. A new Contracting and Procurement Policy highlights the company's expectations of its suppliers with respect to ethical sourcing and fair dealings in the procurement process. These expectations will be included in supplier arrangements going forward.

Additionally, during 2020-2021, StarFlight focused on improved corporate governance and updating and/or developing the following documents:

- Code of Conduct
- Corporate Risk Register
- Modern Slavery Risk Management Plan
- Contracting and Procurement Policy
- Modern Slavery Policy
- Modern Slavery Partner and Supplier Questionnaire
- Whistleblower Policy
- Anti-Fraud Policy
- Anti-Bribery and Corruption Policy
- Anti-Discrimination, Harassment and Bullying Policy
- Grievance Policy.

This policy suite will ensure that StarFlight sources equipment, services and supplies in a manner which meets not only our legal obligations and the standards set by our owners, but the expectations of our customers and partners, and the communities we assist.

Appropriate training will be delivered by the HR team to ensure every employee understands the company's commitment to our values, the standards of behaviour expected by StarFlight, our Shareholders and our external stakeholders, and the support available to them should they need to take action under these policies.

In addition to governance improvements, StarFlight has initiated several important actions during the period.

A Modern Slavery Working Group – under our master supplier agreement, a Working Group has been convened by the LifeFlight HSSE Department and includes key senior staff from Risk and Assurance, Commercial and HR teams.

Going forward this group will meet every six months to review and report to the StarFlight Management Committee on progress in the following:

- training and education to achieve internal awareness of Modern Slavery prevention, the commitments within StarFlight's Modern Slavery Statement and potential risks in StarFlight's supply chain
- include in the formal induction for new staff, awareness of Modern Slavery risks and commitments
- assess all existing supplier and partner arrangements for Modern Slavery risks, and identify and act on any areas of potential exposure
- ensure new supplier contracts set out our expectations with regard to Modern Slavery
- ensure all commercial contracting staff can identify industries or locations which may pose greater Modern Slavery risks and should be targeted for immediate attention
- implement the Contracting and Procurement Policy (including ethical sourcing, fair dealing and Modern Slavery clauses)
- by 30 June 2022, ensure all suppliers are aware of StarFlight's expectations of its own representatives, and its expectations of those it does business with, in terms of combatting Modern Slavery risks in their own operations and supply chains.

Additional Due Diligence Process – While StarFlight maintains its suppliers and partners do not operate in high-risk industry sectors or locations, a comprehensive due diligence process is being undertaken.

An initial action of the Working Group was to commission a Modern Slavery Partner and Supplier Questionnaire. This will be distributed to StarFlight's Tier 1 and Tier 2 contractors in Q4 2021 to provide valuable data and information for StarFlight's ongoing supplier management, supply chain risk analysis and reporting.

This additional due diligence will gather, document and review the following supplier information to assess and mitigate Modern Slavery supply chain risks and maintain a responsible and transparent supply chain going forward.

- Supplier details
- Parent company details
- Modern Slavery Statement "Y/N"
- Approach to dealing with Modern Slavery
- Visibility of supply chain - by types of goods and services and country of origin
- Due diligence in screening suppliers
- Due diligence/governance checks undertaken by supplier.

Results will be provided in StarFlight's Modern Slavery Statement 2021-2022.

7 Authorisation

The Board of StarFlight has authorised and approved the publication of this inaugural Modern Slavery Statement. StarFlight is pleased to publish this voluntary Statement.

Given the company's growth, we envisage future Statements will be a legal requirement and we believe this document to be a strong foundation for us to track, trend and improve upon our progress in combatting all forms of Modern Slavery in our supply chain, in line with Board, Shareholder and community expectations.

StarFlight is focused on the safety and welfare of people. We are dedicated to upholding the commitments made in this Modern Slavery Statement.



Dennis Richardson AC
Chair of StarFlight Australia
Chair of StarFlight Victoria



Modern Slavery Statement 2020-2021

