



# Modern Slavery Statement 2021–2022





# About LifeFlight

LifeFlight is a world leader in aeromedical care, with a core purpose to save lives and serve the community.

For more than 40 years, the company has operated a fully integrated fleet of LifeFlight rescue helicopters and air ambulance jets with its own dedicated team of emergency medical specialists, flight crews, clinical coordination specialists and engineering and maintenance crews. Together, the team provides the people of Queensland and beyond, with the assurance that emergency medical care is available 24/7, 365 days a year, no matter where they live.

In addition to integrated aeromedical services, LifeFlight performs international air ambulance repatriation services, inter-hospital transfers, dedicated aeromedical rescue services for industry partners, and aviation training. Through its joint venture operations, the company provides law enforcement and search and rescue aviation services.

LifeFlight is committed to treating its patients, workers, suppliers and joint venture partners with dignity and respect, ensuring safe working conditions and conducting environmentally responsible, ethical operations.

Our commitment reflects a dedication to the highest aeromedical and air transport safety standards in the world to achieve our mission and vision.

## Our Mission

To save lives and serve the community through the provision of rapid response critical care.

## Our Vision

To be the first choice charity and air medical evacuation organisation.

This Statement is made by LifeFlight Australia Limited (ABN 45010316462) and its wholly-owned subsidiaries LifeFlight Retrieval Medicine Limited (ABN 83101511719), LifeFlight Commercial Limited (ABN 91627081930), LifeFlight Foundation Ltd (ABN 63618170184), Aeromed Qld Pty Ltd (ABN 32144010597) (together the “Company” or “LifeFlight”) under the Modern Slavery Act 2018 (Cth). It covers the financial year from 1 July 2021 to 30 June 2022.

This Statement sets out the actions taken by LifeFlight during the period to establish systems and internal awareness to prevent, detect and respond to modern slavery within our own operations 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 LifeFlight.

LifeFlight acknowledges transparency breeds trust. We wish to advise a delay in reporting due to an oversight. Statements were due 31 December 2022. This statement was submitted 30 June 2023.

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

# 2 Our structure and our operations

LifeFlight Australia Limited and its wholly-owned subsidiaries are 100% Australian owned. We are committed to a culture of ethical and appropriate corporate behaviour in all business activities. This includes acting with integrity, honesty and in accordance with good governance principles.

LifeFlight employs some of the most experienced and qualified aviation professionals in the world including flight crews, emergency medical teams, engineering personnel, safety and systems specialists and program managers. We have an established track record in saving lives and adhering to the highest level of compliance with all applicable civil aviation regulations and specialist medical accreditations.

Providing five air ambulance jets, 11 search and medical retrieval helicopters from 10 Australian bases, LifeFlight is one of the largest aeromedical operators in Australia with a search and rescue region of 53,000,000 km<sup>2</sup>. In addition, LifeFlight provides aeromedical and humanitarian services directly into the Asia Pacific region and, through proven international partners, around the globe. We deliver rapid-response critical care to patients in trauma situations such as motor vehicle accidents and patient retrievals from ships at sea, to neonatal and cardiac inter-hospital transfers, international medical evacuation and repatriations, and law enforcement search and rescue services. We have exceeded 74,000 missions over four decades.

LifeFlight is one of only two integrated aeromedical providers world-wide, meaning we directly recruit our own team of critical care doctors, nurses and paramedics, and our own flight crews, engineers, maintenance teams and aviation systems specialists to operate our own fleet of aircraft. To ensure a seamless, safe operation, these teams work and train together. LifeFlight has its own aviation training academy at Brisbane International Airport, and operates the LifeFlight Communications, Coordination and Control (C3) Centre where nine aviation coordinators managed 85,411 calls (in and out) for the 12 months to June 30 2022.

In 2021-2022, LifeFlight employed 150 critical care doctors, helped 1,962 patients on our community helicopters and flew 432 air ambulance (jet) missions.

Our expertise extends to telephone medical advisory services, the supply of pre-hospital medical specialists on contract to third parties, remote location medical services and tasking co-ordination.

## Structure

LifeFlight was established in 1979 for charitable purposes and remains a registered charity with the Australian Charities and Not-for-Profits Commission. LifeFlight reports to a seven-member Board.

LifeFlight has five wholly-owned subsidiaries, three of which have charitable status:

**LifeFlight Retrieval Medicine Limited** – provides the medical workforce (doctors, nurses and paramedics) into Queensland's aeromedical retrieval network through a contract with Queensland Health. It provides medical crews for both fixed wing and rotary wing aeromedical retrievals.

**LifeFlight Commercial Limited** – is the entity through which LifeFlight undertakes commercial opportunities to raise funds, including air ambulance jet missions for national and international repatriation, aviation training and aeromedical services to other commercial and public sector organisations.

**LifeFlight Foundation Ltd** – is the charitable community fundraising arm of LifeFlight.

**LifeFlight Singapore Pte Ltd** – established to provide international jet air ambulance and emergency humanitarian services, including services for the United Nations. LifeFlight Singapore does not have charitable status.

**Aeromed Qld Pty Ltd (Aeromed)** – established for the leasing of air ambulance jets into the LifeFlight commercial business. Aeromed does not have charitable status

LifeFlight Australia has commercial interests in two joint ventures:

**StarFlight Australia Pty Ltd** – established jointly with Fox Aircraft Services (part of the LinFox Group of Companies) to provide domestic aviation solutions for emergency services, defence and industry clients.

**MediFlite Ltd** – established jointly with the Royal Flying Doctor Service (RFDS) Queensland to provide additional aeromedical services into regional Queensland.

LifeFlight Commercial Ltd has a 50 percent interest in:

**StarFlight Victoria Pty Ltd** – established jointly with Fox Aircraft Services (part of the LinFox Group of Companies) to provide law enforcement and emergency search and rescue services to the Victorian Government.

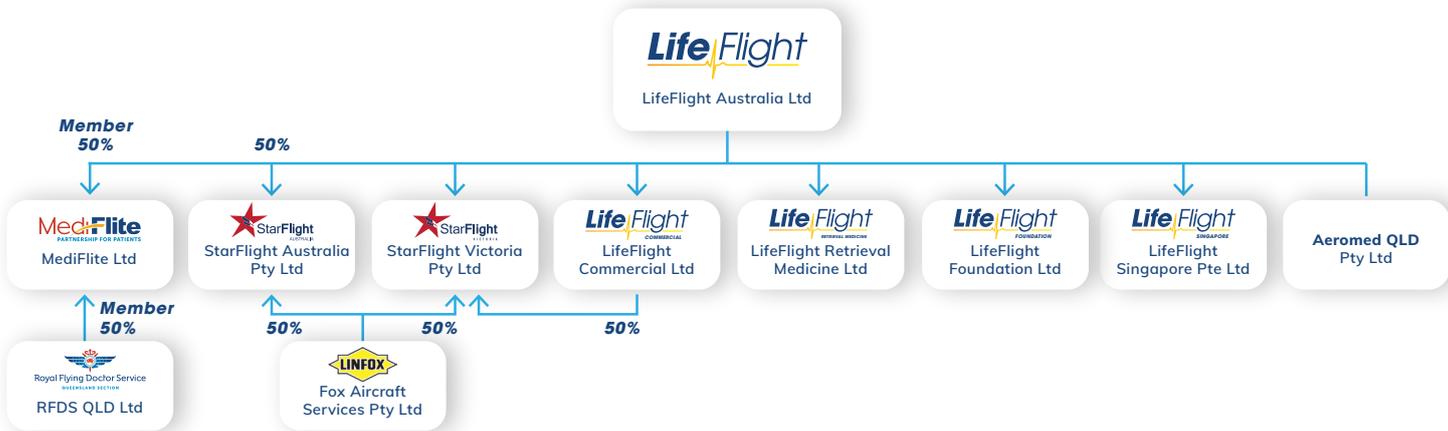
LifeFlight Australia also provides air training services to its group of companies and other air operators through the LifeFlight Training Academy. It provides world class aviation engineering and maintenance services to all the LifeFlight companies and to its joint venture partners StarFlight Australia and StarFlight Victoria.

LifeFlight has a number of service agreements with significant commercial and public sector entities for the provision of aeromedical and search and rescue services, which are funded by government, public fundraising and commercial service provision. These include:

1. Aeromedical and retrieval services for Queensland Health;
2. Aeromedical services to a consortium of gas companies in Queensland's Surat Basin;
3. Consultant level medical advice to Australian Maritime Safety Authority;
4. Aircraft provision for Tasmania Department of Health aeromedical services (Rotor-Lift Aviation);
5. Commercial repatriation services (governments and commercial companies);
6. Dedicated jet air ambulance services into Asia Pacific; and
7. Law enforcement and search and rescue services for the State Government of Victoria.

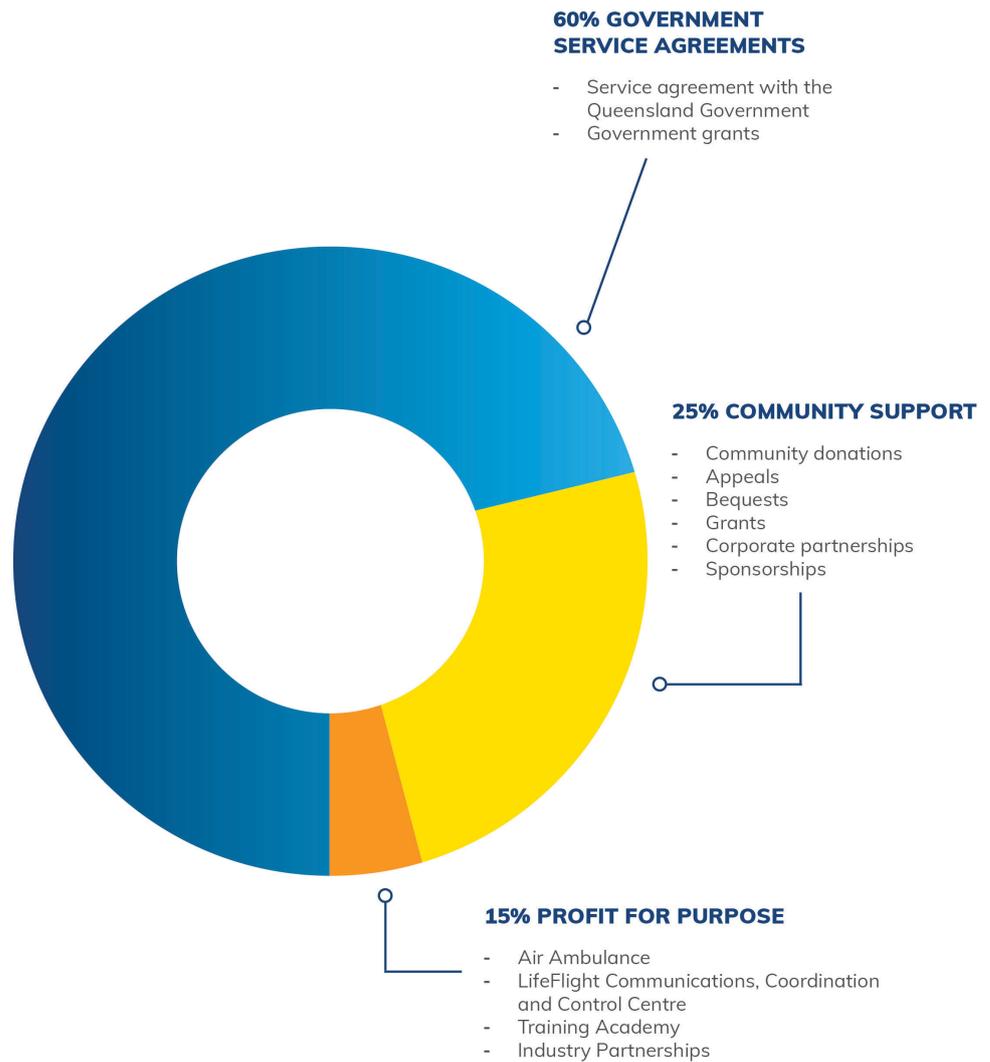
The following diagram describes the relationship between LifeFlight and its subsidiaries, and affiliate companies.

### LifeFlight Australia Company Structure

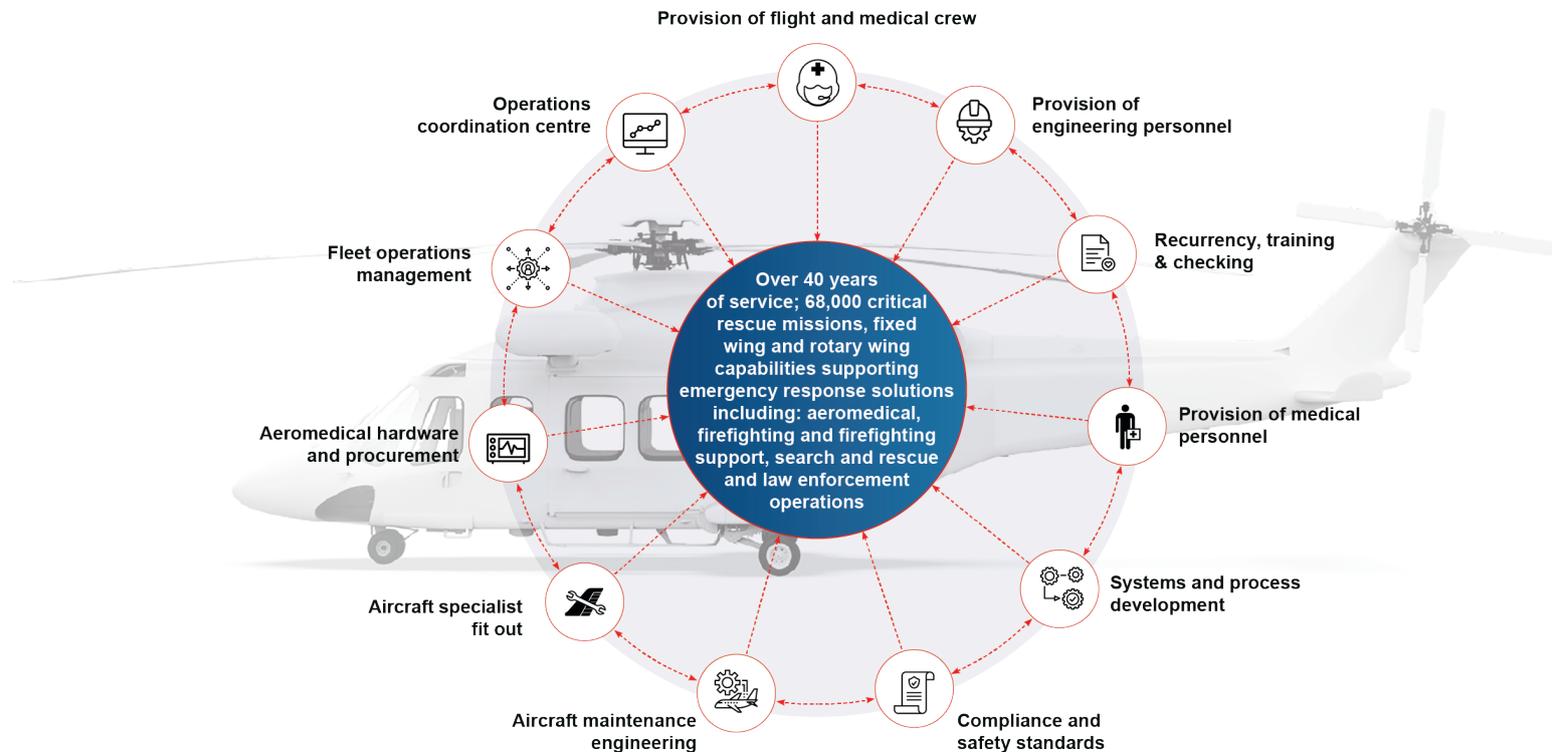


## Funding Model

LifeFlight operates a 'profit for purpose' funding model with a single objective to sustain vital life-saving services to Australian communities. All profits created by LifeFlight companies, including LifeFlight's interests in commercial joint ventures, government contracts, international jet retrievals and its training and engineering services, are directed back into LifeFlight Australia to fund its emergency aeromedical rescue and retrieval services.



## Capabilities



Our capabilities include:

- medical repatriation and evacuation
- pre-hospital and inter-hospital critical medical care
- aeromedical tasking and coordination
- emergency medicine specialist personnel, training and hire
- aircraft mission systems
- law enforcement
- specialised training for the aeromedical and aviation industries
- telephone medical advisory services
- remote area medical and retrieval services to the resources industry
- search and rescue
- aircraft engineering and maintenance
- firefighting support
- safety and assurance.

## Our Assets and Bases

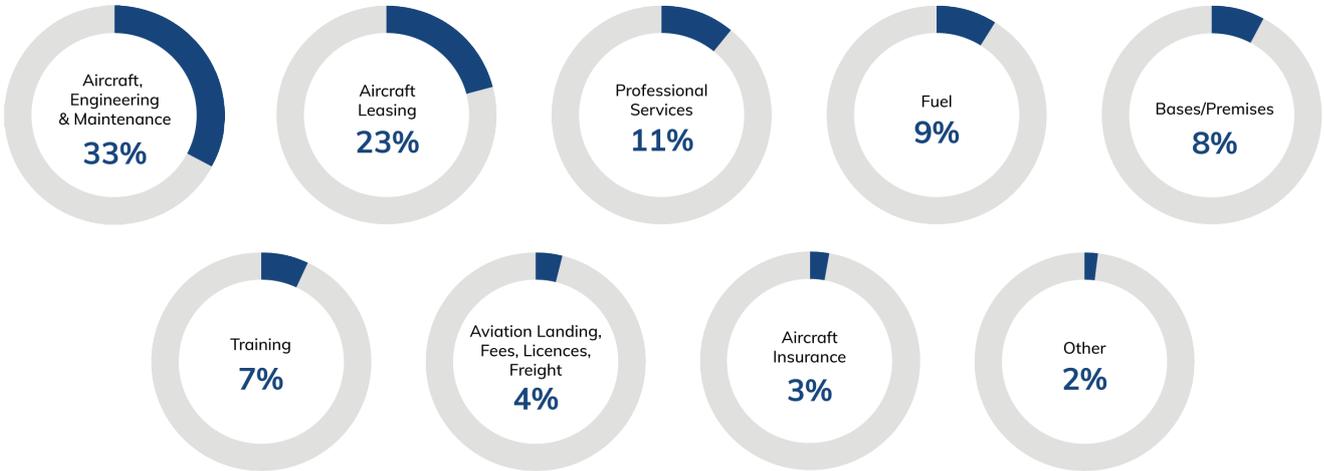
LifeFlight has an extensive fleet of helicopters and fixed wing aircraft which operate from 10 bases throughout Australia – eight in Queensland, one in Victoria and one in Tasmania. LifeFlight’s emergency medical crews are deployed from those eight Queensland bases, and from three additional Queensland bases (Cairns, Mackay and Rockhampton) where they are contracted to third party aeromedical and emergency rescue providers.



# 3 Understanding our supply chain

Our value chain consists of suppliers who provide services directly to LifeFlight such as the leasing of specialist fixed and rotary wing aircraft, aircraft mission systems, medical and surveillance technologies, engineering and maintenance support, training and aviation-related construction (hangars and accommodation).

Our 2021–2022 spend profile by supply category is shown in the following diagram. By far our largest area of supplier spend relates to aircraft engineering and maintenance and aircraft leasing.



Aircraft engineering and maintenance and aircraft leasing account for just over half of our supply chain in terms of supply category and percentage spend, sourced through Canadian, Italian, USA and Australian companies. These companies are identified in LifeFlight’s Tier 1 and Tier 2 suppliers for the provision of services to LifeFlight.

## Tier 1 suppliers

LifeFlight's Tier 1 suppliers are defined as those who provide the highest proportion (by value) of LifeFlight's engineering, assets, logistics and corporate services annually.

In 2021-2022, Tier 1 suppliers comprised Leonardo Company, GECAS Australia and Thales Australia, who provided aircraft leasing, engineering and maintenance services, and avionics and simulation services to LifeFlight.

1. **Leonardo** – designs, builds and maintains high performance commercial aircraft, at operations based in Italy. The company supplies aircraft engineering and maintenance services direct to LifeFlight, 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.leonardo.com/en/](http://www.leonardo.com/en/)).
2. **GE Capital Aviation Services Australia (acquired by Aercap in Nov 2021)** – the world's largest owners of commercial aircraft and leader in aviation leasing, through which LifeFlight leases rotary wing aircraft. GECAS have published a Modern Slavery Statement under the Australian Commonwealth Modern Slavery Act; however AerCap has not. While there is a relatively low business sector risk, we are committed to increasing supplier engagement and assessment of modern slavery risk.
3. **Thales Australia** – specialises in avionics and aerospace electronics and is the major maintenance, spares and systems supplier to the Australian Defence Force. Thales Australia provides flight simulation services to LifeFlight as part of the LifeFlight Training Academy for specialist aviation crews. Its parent company Thales UK has a published Modern Slavery Statement under UK legislation ([www.thalesgroup.com](http://www.thalesgroup.com)).

## Tier 2 suppliers

LifeFlight identified six Tier 2 suppliers, defined as those who provided the next highest proportion (by value) of services to support its operations in 2021-2022. Please note, the sixth supplier, Milestone Aviation was acquired mid-year and for this purpose has been included as a Tier 2 supplier.

1. **Aeromed** – a wholly owned LifeFlight entity, based in Australia, through which LifeFlight leases a number of jet air ambulances for its commercial aviation business.
2. **Bombardier** – a global manufacturer of commercial jets including the Learjet, Challenger and Global, based in Canada. It supplies aviation engineering and maintenance services to LifeFlight and is the manufacturer of a number of jets in the LifeFlight fleet. Bombardier has a published Modern Slavery Statement under the United Kingdom Modern Slavery Act 2015 ([www.bombardier.com](http://www.bombardier.com)).
3. **Lease Corporation International (LCI) Helicopters** – a helicopter leasing company based in Ireland. LCI leases Airbus, Leonardo, Boeing and Bombardier rotary and fixed wing aircraft to major airlines and emergency and rescue organisations worldwide. LifeFlight leases a number of its helicopters through LCI.
4. **Pratt & Whitney** – a Canada-based aircraft engine manufacturer that provides aircraft engine maintenance for LifeFlight. Pratt & Whitney's parent company Raytheon Systems Ltd has a published Modern Slavery Statement under UK modern slavery legislation ([www.raytheon.com](http://www.raytheon.com)).
5. **IOR Aviation (IOR)** – owned by IOR, one of Australia's largest energy and infrastructure providers. IOR supplies fuel and fuel management technology to LifeFlight. IOR has a published Modern Slavery Statement under the Australian Commonwealth Modern Slavery Act 2022 ([www.ior.com.au](http://www.ior.com.au)).
6. **Milestone Aviation (GECAS company acquired by Aercap Nov 2021)** - a subsidiary of the world's largest owners of commercial aircraft and leader in aviation leasing, through which LifeFlight leases rotary wing aircraft.

# 4 Our position on Modern Slavery

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

## Our Values

LifeFlight aims to model our own values in the way we work (as shown in the diagram 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, LifeFlight refers to overarching Non-Negotiable Principles in its Risk Framework. These principles help to set LifeFlight's expectations not just for what work needs to be delivered, but how we expect business to be conducted.

- 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 2021-2022, LifeFlight assessed its potential supplier risks across its highest spend categories (Tier 1 and Tier 2 suppliers were reviewed and prioritised).

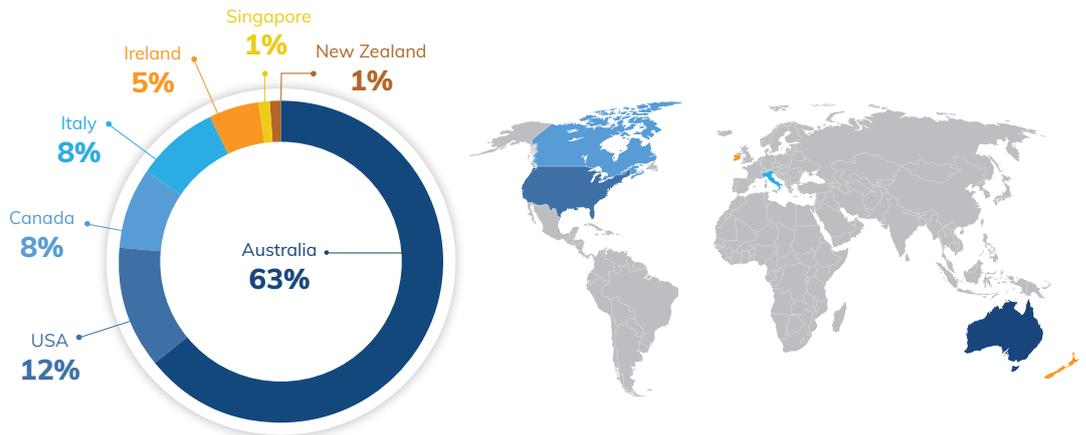
Potential risks for modern slavery were assessed according to:

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

## Geographic location of services and suppliers

Almost 65% of LifeFlight’s supply spend is within Australia and almost 100% of its staff are domiciled here.

The largest service, by percentage spend, is for aircraft engineering and maintenance services. The maintenance of aircraft, and aircraft engines, is a highly regulated industry and in instances like engine maintenance, are part of a maintenance program directly with the aircraft manufacturer. LifeFlight sources its maintenance services directly from the aircraft manufacturer at its global operational site, or in Australia where the manufacturer has a subsidiary.

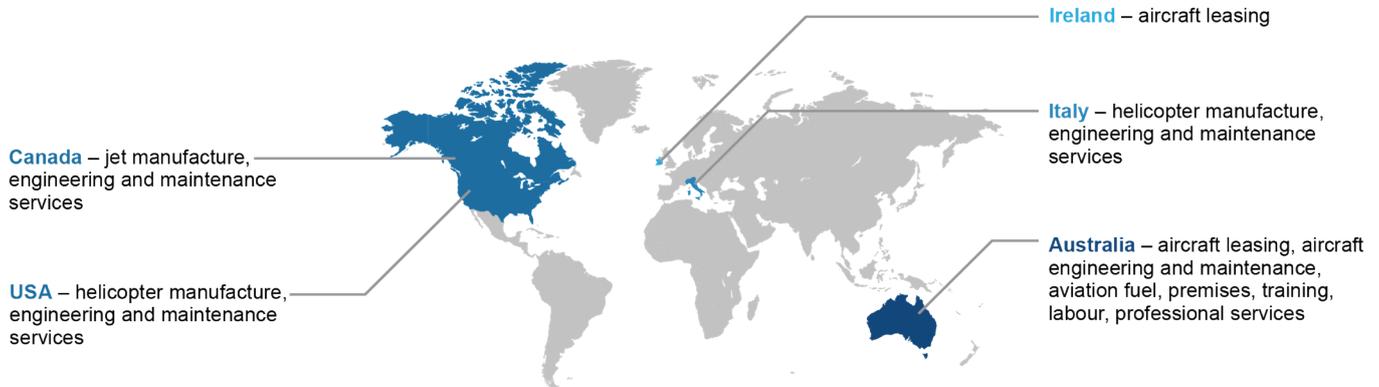


LifeFlight’s second supplier, by country of origin, is the USA followed by Canada. Milestone Aviation are the largest USA supplier (Tier 2). Pratt & Whitney and Bombardier, both in Canada, have also been identified as Tier 2 suppliers.

LifeFlight also sources aircraft engineering and maintenance services directly from Leonardo Company, the global helicopter manufacturer based in Italy, Europe and a Tier 1 supplier to LifeFlight. Italy is the fourth largest supplier, by country of origin, to LifeFlight.

The category ‘Other’, at 1%, largely consists of aircraft landing fees payable in 2021-2022 to airports in New Zealand, Singapore, Indonesia, Malaysia and UAE.

Six of nine of LifeFlight's identified Tier 1 and Tier 2 suppliers have registered Modern Slavery Statements applicable to their jurisdictions and governing their procurement of goods and services.



## Industry sector and product or service

As a leading aviation and emergency services provider, LifeFlight operates under medical aviation and quality and governance accreditation, including International Standard ISO 9001: 2015. LifeFlight 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 aeromedical services are released or services are delivered and is a continuous process to ensure quality improvement as well as compliance.

LifeFlight 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 LifeFlight 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.

However, 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, LifeFlight's Risk Assessment Framework incorporates Modern Slavery risks. A Modern Slavery Working Group oversees the monitoring and review of modern slavery risks. Causes and controls are identified in the Enterprise Risk Register. Quarterly review of Enterprise Risk Register by ARMC. 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.

Further, the LifeFlight Code of Conduct, company inductions and the Contracting and Procurement Policy 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 LifeFlight to Modern Slavery practices.



## Actions Taken in 2021-2022

LifeFlight's Code of Conduct reflects the company's expectations of staff, contractors and partners with regard to Modern Slavery and other human rights matters, unethical or illegal conduct. A Contracting and Procurement Policy highlights the company's expectations of its suppliers with respect to ethical sourcing and fair dealings in the procurement process. LifeFlight use best endeavors to include these expectations in supplier arrangements.

LifeFlight's policy suite incorporate the company's expectation and assist LifeFlight to source infrastructure, 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 patients and communities we assist. We will continue to review our policies and procedures to ensure that modern slavery risks are highlighted and are appropriately addressed.

Additionally, during 2021-2022, LifeFlight focused on improved corporate governance, workforce and supply chain engagement, supply chain analysis and improved reporting to prevent, detect and respond to modern slavery within our own operations and supply chains.

### Governance

Our Board is responsible for overseeing and approving the annual modern slavery statement. It receives updates from the Modern Slavery Working Group, who oversee the monitoring and review of modern slavery risk. The Group, comprising of representatives Risk and Assurance, Commercial and P&C teams, report to the LifeFlight Risk and Audit Committee.

- Biannual meetings of the Modern Slavery Working Group, convened by the Director of HSSE. LifeFlight's Risk Assessment Framework incorporates Modern Slavery risks. Causes and controls are identified in the Enterprise Risk Register. Quarterly review of Enterprise Risk Register by ARMC.
- LifeFlight's current risk assessment for modern slavery has not identified any material industry sector or location.

### WorkForce

- Training and awareness programs delivered by the People & Culture (P&C) team, and incorporation into LifeFlight's Code of Conduct and formal inductions for new staff to achieve internal awareness of Modern Slavery prevention, the commitments within LifeFlight's Modern Slavery Statement and potential risks in LifeFlight's supply chain.
- Education of commercial contracting staff to identify industries or locations which may pose greater Modern Slavery risks and should be targeted for immediate attention.

### Policies and Supply Chain Assessment

- Implementation of the Contracting and Procurement Policy.
- Communication with new and existing suppliers to ensure awareness of LifeFlight's expectations of its own representatives, and its expectations of those it does business with, in terms of combating Modern Slavery.
- New supplier contracts include our expectations with regards to Modern Slavery.

Additional due diligence is undertaken with the commencement of supplier self-assessment questionnaire ("SAQ") in Q4, 2021. The intention of the SAQ was to 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. Due to a lack of supplier engagement in Q4 2021, the SAQ will be again distributed in 2022-2023. Results will be provided in LifeFlight's Modern Slavery Statement 2022-2023.

- 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.



# 7 Strengthening our Preventative Actions

The measures outlined in this document, along with our review processes and organisational values, provides a guiding framework to reduce the risk of modern slavery in our practices and with our suppliers. In 2022-2023 LifeFlight will use best endeavours to implement the below actions to strengthen our modern slavery prevention actions.

## Supplier Engagement Strategy and Review

- Supplier self-assessment questionnaire. Collate, analyse and report on SAQ.
- Advance supplier engagement and collaboration.
- Develop and implement supplier code of conduct.
- Revision of Contracting and Procurement Policy.

## Training

- Review further opportunities to integrate e-learning modules to bring awareness to a range of stakeholders.

## Remediation

- Consider and develop remediation policies to outline actions required and carrying out those remedial steps if cases of modern slavery are identified.

## Increased Monitoring and Reporting

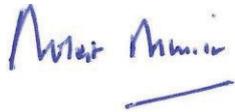
- Establish processes and KPIs to monitor the effectiveness of the steps taken to address modern slavery risk.
- Increased reporting to the Board and subcommittees to review actions taken in response to modern slavery.

# 8 Authorisation

LifeFlight is committed to ensuring our organisation and supply chain operate with integrity and without exploitative practices. We strongly oppose modern slavery in all its forms.

The Board of LifeFlight has authorised and approved the publication of the Modern Slavery Statement 2021-2022. LifeFlight is pleased to publish this Statement.

Given the company's growth plans, 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 and community expectations.



**Hon. Robert Borbidge**  
Chairman (Non-executive)  
LifeFlight Australia



**Hon. Jim Elder**  
Chairman (Non-executive)  
LifeFlight Commercial



# Modern Slavery Statement 2020–2021

