



## Modern Slavery Statement

Financial year 2022/23

# CareFlight

## Supplier Code of Conduct

CareFlight’s vision is to be the most advanced integrated aeromedical service trusted by all Australians. In keeping with this vision, we recognise the importance of managing our supply chain to ensure that the goods and services we purchase are provided to us in a manner that respects fundamental human rights, is consistent with our Code of Conduct and Ethics, and recognises our responsibility to manage the environmental impact of our operations.

The Supplier Code of Conduct (**Code**) applies to all suppliers of goods or services to CareFlight. We expect that our suppliers, whether directly or through their supply chain, conduct themselves according to the principles and standards in this Code and implement suitable management systems and processes. We also expect that our suppliers provide influence and guidance within their own supply chain to adopt the principles and standards in this Code.

### Compliance with Laws

Suppliers are required to comply with all applicable national and local laws and regulations, including but not limited to those relating to labour, health and safety, and the environment.

### Ethics and Business Conduct

CareFlight expects suppliers and their agents to behave ethically and with integrity in all business transactions.

- All forms of corruption, extortion or embezzlement are strictly prohibited.
- Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.
- Suppliers should not offer or receive gifts that could affect, or be perceived to affect, the outcome of business transactions or are not otherwise reasonable and justified.
- Financial records must be kept in accordance with all applicable accounting practices, legal and regulatory requirements.
- Suppliers will conduct their business in line with fair competition and in accordance with all applicable competition laws.

- Suppliers will not publicly disclose their supply association with CareFlight or use the CareFlight name or brand elements without CareFlight’s prior written consent.
- CareFlight’s intellectual property rights are to be respected.

### Human Rights and Labour Standards

#### Human Rights

CareFlight respects fundamental human rights. As set out in the Universal Declaration of Human Rights (UDHR), suppliers are expected to recognise and be committed to upholding the human rights of workers.

#### Forced Labour and Inhumane Treatment

- Suppliers will not use any forced, bonded or indentured labour or involuntary prison labour.
- Suppliers will not engage in, or condone, inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion of workers.
- Suppliers will ensure their activities do not contribute toward human exploitation, including human trafficking.

#### Child Labour

Suppliers must not engage in practices relating to, or subcontract with organisations, who employ child labour.

#### Wages, Benefits and Conditions

- Suppliers will compensate workers in compliance with all applicable local wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Working hours are not to exceed the legally accepted maximum set by local laws.
- Suppliers are responsible for maintaining the workplace and any living quarters used to house workers in a hygienic and safe manner.

Signed:



Mick Frewen - CEO CareFlight



**1. INTRODUCTION**

This is the third Modern Slavery Statement of CareFlight Limited (ABN 18 210 132 023) pursuant to the *Modern Slavery Act 2018* (Cth) (“Act”). CareFlight is a reporting entity under the Act and this Statement sets out the steps we have taken during our financial reporting period from 1 May 2022 to 30 April 2023 to identify and assess the risk of Modern Slavery (as defined in the Act) in our operations and supply chains, and the processes we have in place to assess and address those risks.

CareFlight is fully committed to acting ethically and operating responsibly. This commitment extends to enhancing our practices and processes to better identify and minimise the risk of Modern Slavery in our operations and supply chains and to ensure we are engaging with suppliers that share that commitment.

The reporting framework under the Act presents CareFlight with an opportunity to gain continuing deeper understanding of the supply chains that underpin the delivery of our programs and other operations. This has enabled us to continue our commitment to develop better frameworks and processes to minimise the risks of Modern Slavery in our operations and supply chain and to ensure our suppliers adhere to CareFlight’s Supplier Code of Conduct (opposite).

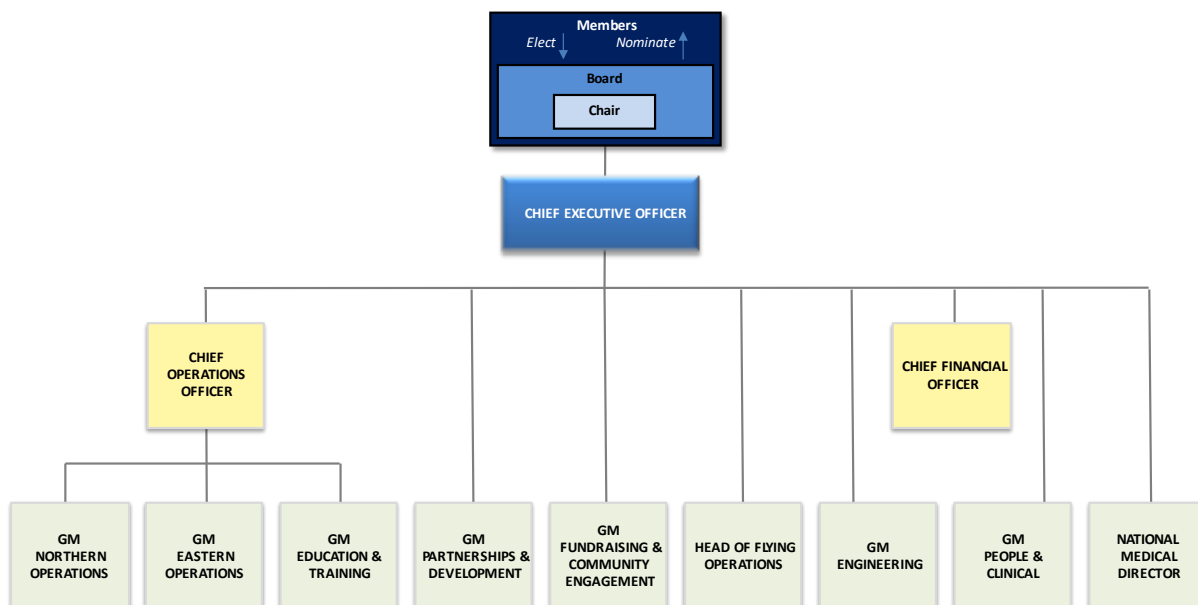
**2. STRUCTURE, OPERATIONS & SUPPLY CHAIN**

CareFlight primarily provides aeromedical retrieval services and support services, including maintenance, fundraising, education and training.

We are working closely and non-stop with our partners across the healthcare system as we continue to deliver our mission to save lives, speed recovery and serve the community

**Structure**

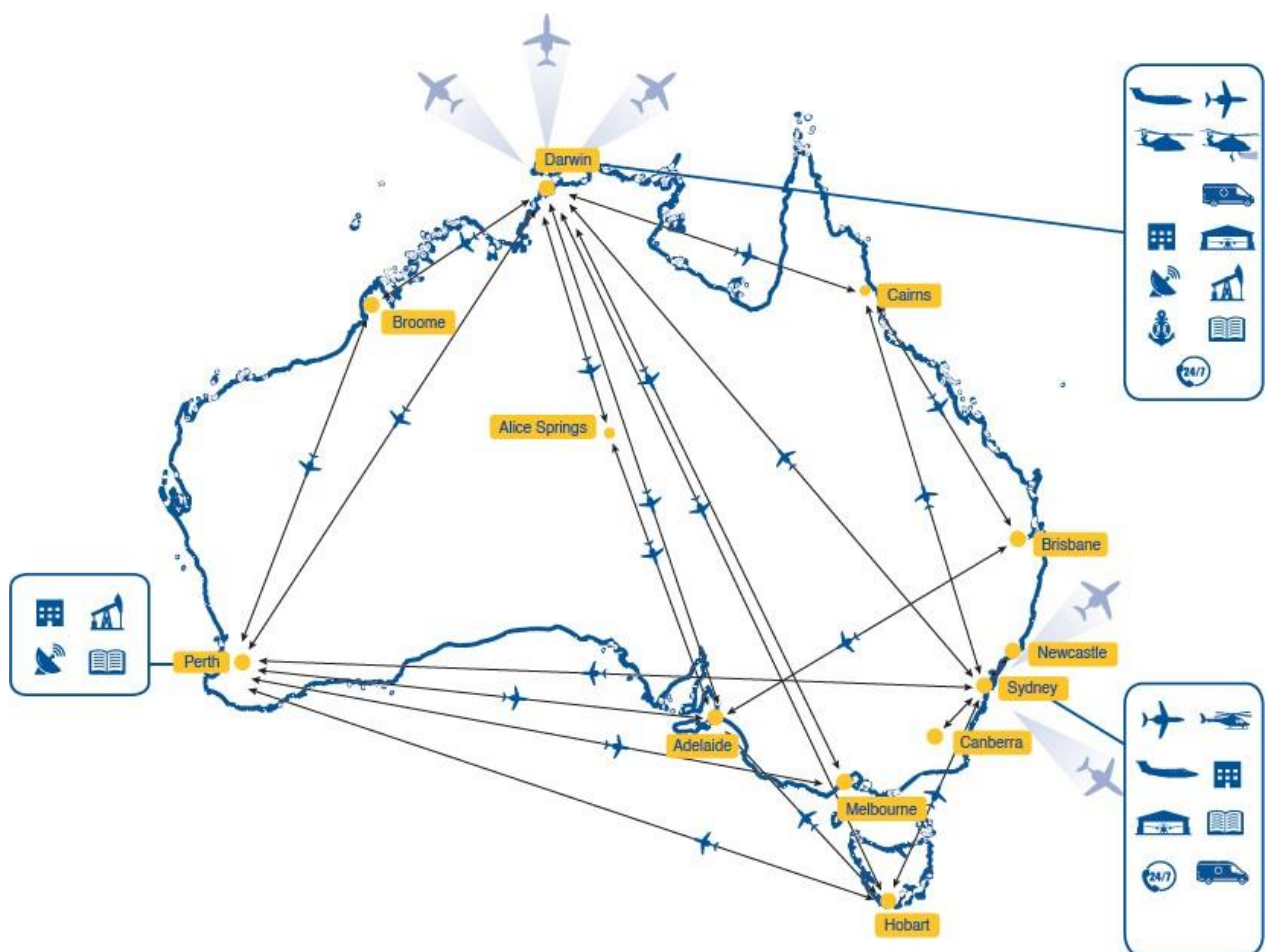
**CAREFLIGHT STRUCTURE**



**Operations**

CareFlight key activities across Australia include:

- **Aeromedical Retrieval** – interhospital transfers, accident to hospital, home to healthcare facility
- **Repatriation Flights** – international retrievals
- **Patient Vehicle Transfers** – to support the above aeromedical operations
- **Search and Rescue** – including our Fire, Flood & Rescue (FFR) operations
- **Engineering** – CASA CAR30 aircraft maintenance & servicing integrating into One CareFlight
- **Clinical Training** – Colleges accredited and corporate training of industry -specific courses
- **Aviation Training** – CASA Part 119 Training & Checking and Part 141/142 organisation
- **MediSim Training** – simulation workshops to First Responders, including remote communities
- **First Aid Training** – provision of accredited First Aid and CPR Training
- **Fundraising** – to provide funds towards our operations and social purpose
- **Marketing** – and Communications to promote CareFlight brand



<b>Services</b>	Oil, Gas & Mining Industry Support	Maritime Support & Retrieval
Fixed Wing Air Ambulance Services	Aeromedical Services	Education Centre
Medi-Jet Services	Road Support Services	24/7 Help Point Mission Coordination
Top End Rescue Helicopter	Logistics & Support HQ	<b>Locations &amp; Flights</b>
Rapid Response Service	Aircraft & Engineering Base	Domestic Flight Paths
Search & Rescue	Telemedicine & Remote Support	International Flights

## Suppliers

CareFlight sources goods and services from a vast range of suppliers, predominantly within Australia.

Our major categories of procurement include:

### Aviation

- Aircraft
- Aircraft components
- Maintenance tools
- Maintenance consumables
- Fuel
- Simulator training

### Clinical

- Medical equipment & devices
- Clinical consumables
- PPE
- Pharmacy
- Clinical training services

### Fundraising & Marketing

- Appeals
- Regular Giving
- Grants
- Advertising – print, digital
- Communications – media, design, printing
- Promotional merchandise and apparel – stock, bears, t-shirts

### Support Services

- Staffing
- Uniforms
- IT and technology
- Utilities
- Contractors
- Patient Road vehicles

## 3. RISKS OF MODERN SLAVERY PRACTICES

With CareFlight's operations primarily in Australia, we consider the risk of direct involvement in modern slavery practices to be low.

CareFlight's currency transactions to its 44 foreign suppliers were reviewed over the last year to identify potential high-risk suppliers based on geography. Foreign transactions in the reporting year were only undertaken in currencies of Australian dollars, US dollars, Euros and GBPs to 42 foreign suppliers either within Australia, the USA, Germany, Ireland, Finland or the UK. None deposited to countries of high-risk, nor denominated in currencies of countries considered high-risk.

There were 2 foreign suppliers used by CareFlight in countries that could be considered vulnerable to modern slavery (Japan, India) where CareFlight did pay JPY & AUD dollars for goods and services.

Whilst all our direct suppliers appear low risk there may be suppliers/importers used by CareFlight whose upstream vendor operations are in high-risk countries. These have been identified, based on industry and geographic risk assessment, and include:

- Aircraft components/parts
- Clinical devices / consumables
- IT hardware
- Promotional merchandise and apparel
- Uniforms / Garments
- Cleaning Services
- Visa enabled labour hire

It was also identified that there is additional risk with suppliers who have limited commercial experience and/or only basic English language capability. Knowledge of modern slavery legislation may be beyond their practical understanding, and therefore they may fail to identify risk and drive change in their operations or supply chain.

Reviews of suppliers considered to fall within the above areas were undertaken to identify potential indirect modern slavery risks in the upstream vendor operations of our suppliers.

#### **Aircraft components / parts**

CareFlight contracts with a number of suppliers to support its aviation operations. The bulk of the acquisitions are from Australian companies that have regulatory approval to supply aviation parts, many of whom already report their own Modern Slavery Statements. Some spare parts, components and consumables are sourced from overseas aviation manufacturers and suppliers via a global supply chain network. These suppliers are reputable companies subject to very high safety and compliance standards from Original Equipment Manufacturer (OEM) in USA or European countries that have a low prevalence of modern slavery and governments that take strong action to eliminate it. Nevertheless, there are risks that the manufacture or supply of some of the aviation parts and components may contribute to modern slavery practices. Although CareFlight is not aware of such practices, it will continue to act in accordance with legal requirements and continue its annual due diligence audits on these critical suppliers to identify risks of modern slavery in upstream vendors in the aviation supply chain.

#### **Clinical equipment / consumables**

All of our suppliers of clinical equipment / consumables are Australian legal entities based in Australia. Clinical equipment / consumables used by CareFlight have prior approval by the Therapeutics Goods Administration (TGA) and Australian Register of Therapeutic Goods (ARTG) registration, regardless of where they are sourced. The risk of modern slavery is in the supply chains upstream of our direct suppliers.

Our direct suppliers, although located in Australia, are highly likely to import products from overseas, including from countries where modern slavery may be more prevalent. CareFlight outsources procurement of the bulk of its clinical equipment/consumables to two large supplier corporations: one for our Northern Operations and one for our Eastern Operations. Both these corporations are required to produce a Modern Slavery Statement, both of which identify supply by offshore vendors in certain countries as a risk and provide ongoing assurance as to how the risk is being managed. If we are unable to procure items from these two CareFlight preferred suppliers we utilise other clinical suppliers, common to many healthcare organisations which would also place them under significant scrutiny as the healthcare industry strives to reduce the risks around modern slavery.

**IT hardware**

The electronics industry is recognised globally as a high-risk industry. Manufacturing often occurs in locations with minimal regulation and oversight, where workers have limited resources and methods for resolving grievances. There is also a risk that products are manufactured from raw materials where workers have been subjected to modern slavery and that accordingly we could contribute, or be directly linked to, modern slavery practices through the purchase of electronic devices, including computers and mobile phones. CareFlight has engaged a global IT hardware supplier and has reviewed the suppliers approach to addressing risks of modern slavery in its own supply chain. The supplier was found to be well-advanced in this area. The supplier has a clear and well-publicised zero-tolerance approach to modern slavery in its supply chain and maintains global Modern Slavery Statements in compliance with the Australian Modern Slavery Act 2018, the U.K. Modern Slavery Act 2015, and the California Transparency in Supply Chains Act 2010.

**Promotional merchandise and apparel**

CareFlight has outsourced the procurement of promotional merchandise to a large Australian supplier that does engage with manufacturers/suppliers from high-risk countries (including China, India, Bangladesh, Vietnam, Thailand, Indonesia, Laos, and Brazil). The Australian supplier has lodged its own Modern Slavery Statement and has clearly identified its risk in these high-risk countries. It adopts a continuous improvement model, backed up by independent auditing of its suppliers, to ensure that the operations of the factories from which it sources the products are safe, fair, sustainable, and importantly free of modern slavery.

**Uniforms / Garments**

Garments, particularly branded clothing and Protective Personal Equipment (PPE) are often produced in countries with higher risks of modern slavery, where government oversight and due diligence processes are less stringent than those in Australia. Without adequate contractual arrangements and due diligence there is a risk that we could be contributing to, or be directly linked to, modern slavery practices through our arrangements with third party suppliers of PPE and uniforms for our employees. There is also a risk that products are manufactured from raw materials such as cotton, where workers may have been subjected to modern slavery. CareFlight engages three garment suppliers: one for business wear and two for workforce uniforms/apparel. The business wear supplier has its own Modern Slavery Statement registered with the Australian Government and one of the workforce uniforms suppliers is Supply Nation Certified and a member of the First Australians Chamber of Commerce and Industry, the other is also Australian based – all suppliers are considered low-risk by CareFlight.

**Cleaning Services**

CareFlight engages its cleaning staff via small local cleaning services. Terms and conditions are set out in formal agreements. Although CareFlight has identified this to be an area of modern slavery risk, there is no evidence to indicate any local issues. However, as part of its forthcoming modern slavery program of work, CareFlight will undertake a deeper assessment of the local suppliers due to the inherent risk in the wider cleaning industry and may implement changes to further reduce risk in this area such as participation in the Cleaning Accountability Framework.

**Visa Enabled Labour Hire**

Work undertaken by employees who are in Australia on temporary work visas, tends to carry a higher risk of modern slavery due to its transitory nature. Without adequate contractual arrangements and due diligence there is a risk that we could contribute or be directly linked to modern slavery practices through the hiring of short-term contract workers via recruitment agencies. During the reporting year CareFlight had 30 employees on 13 different visa types, 9 x 189, 4 x 190, 3 each of 155,482, 2 each of 186, 801, 1 each of 408, 417, 491, 444, 494, 500, 820. All CareFlight VISA employees were reviewed and found to have the same contract/award conditions as equivalent CareFlight employees, so there is very low risk of modern slavery to CareFlight VISA employees. A review of the high risk CareFlight suppliers has identified them as not being primary manufacturers/producers, so there is a low risk of utilising non-compliant migrant VISA workers in Australia but acknowledges that some may have warehouse storage / distribution services which may indeed hire unskilled VISA migrant workers, although CareFlight is not presently aware of any.

**4. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS OF MODERN SLAVERY PRACTICES**

CareFlights approach to manage modern slavery risk includes the following measures -

1. A published CareFlight Supplier Code of Conduct on our website – complete.
2. Maintained an Employee Code of Conduct, which mandates employee compliance with all laws, rules, regulations and policies, with consequences for any breaches – complete.
3. Maintained a Whistleblower policy, complete with internal Whistleblower Protection Officer, a Toll-Free Ethics Hotline, and a response program – complete.
4. Maintained a compulsory registered online training module for the Employee Code of Conduct. This registers all employees who have completed the training module upon employment commencement, and also upon re-training following Employee Code of Conduct updates – complete.
5. Maintained our equal opportunity, discrimination, and harassment policies – complete.
6. Utilised our feedback, compliments, complaints and grievance policies – complete.



## 5. EFFECTIVENESS OF ACTIONS AND LOOKING FORWARD

CareFlight intends to continue to improve our assessment and mitigation activities by -


- Continuing to utilize our supplier survey and audit form to enable us to assess the risk of Modern Slavery in our operations and supply chains as part of our supplier surveillance.
- After completing a review of our suppliers, based on industry and geography, rank according to modern slavery risk.
- For 'higher risk' suppliers, perform a more detailed modern slavery assessment. Where necessary, cease commercial relationships with that supplier.
- Undertake annual modern slavery supplier reviews to assure we maintain our commitment to acting ethically and operating responsibly.
- Incorporate modern slavery risk into the broader CareFlight risk framework.
- Incorporate modern slavery risk and compliance into corporate governance processes, including board reporting processes.

## 6. CONSULTATION AND APPROVAL PROCESSES

CareFlight has prepared this Statement with commitment from senior management with delegated accountability for the following functions:

- Supply chain and procurement;
- Finance;
- Commercial; and
- Legal/Compliance.

This statement was approved by the members of the Board of CareFlight in their capacity as the principal governing body of CareFlight on 20<sup>th</sup> October 2023.



Andrew Refshauge

Chair of the Board for CareFlight