



Modern Slavery Statement

2022 - 2023



From the Chair

Since publishing our first Modern Slavery Statement ("Statement") in 2020, LifeFlight continues to mature on all fronts.

We continue to identify and address the risk of modern slavery across the business, which has required coordinated action throughout the organisation.

While LifeFlight has not yet identified any instances of modern slavery, we continue to apply the systems and processes outlined in this document to identify areas where there may be risk of modern slavery, and to address any identified gaps.

1 About LifeFlight

LifeFlight Australia Ltd 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, LifeFlight 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) and LifeFlight Singapore Pte. Ltd (Registration No. 201626689G) (together the "Company" or "LifeFlight") under the Modern Slavery Act 2018 (Cth).

LifeFlight's overarching policies, systems and processes are applied across all entities.

By virtue of LifeFlight's centralised management structure, the consultation process included all subsidiaries facilitated by a Modern Slavery Working Group who oversee preparation of the Statement and include key representatives to ensure a cross-functional view.

The Statement covers the financial year ending 30 June 2023. 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' or 'our', it is a reference to LifeFlight.

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

2 Our structure and our operations

LifeFlight 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 aeromedical 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 all applicable civil aviation regulations and specialist medical accreditations.

Providing four air ambulance jets, 13 search and medical retrieval helicopters from 10 Australian bases, LifeFlight is one of the largest aeromedical operators in Australia. 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 81,000 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 manage 90,000 calls (in and out) for the 12 months to 30 June 2023.

In the 2022-23 financial year, LifeFlight employed 180 critical care doctors, and helped 7,349 patients.

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

Since humble beginnings in 1979, as the Sunshine Coast Rescue Helicopter Service, LifeFlight has grown to become one of Australia’s largest aeromedical service providers. LifeFlight reports to a nine-member Board and is a registered charity with the Australian Charities and Not-for-Profits Commission (“ACNC”).

LifeFlight has five wholly-owned subsidiaries, three of which are registered charities with ACNC.

LifeFlight Retrieval Medicine Ltd – 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 Ltd – 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.

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 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.

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 – operated jointly with the Royal Flying Doctor Service (“RFDS”) Queensland to provide additional aeromedical services into regional Queensland.

LifeFlight Commercial has a commercial interest in:

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

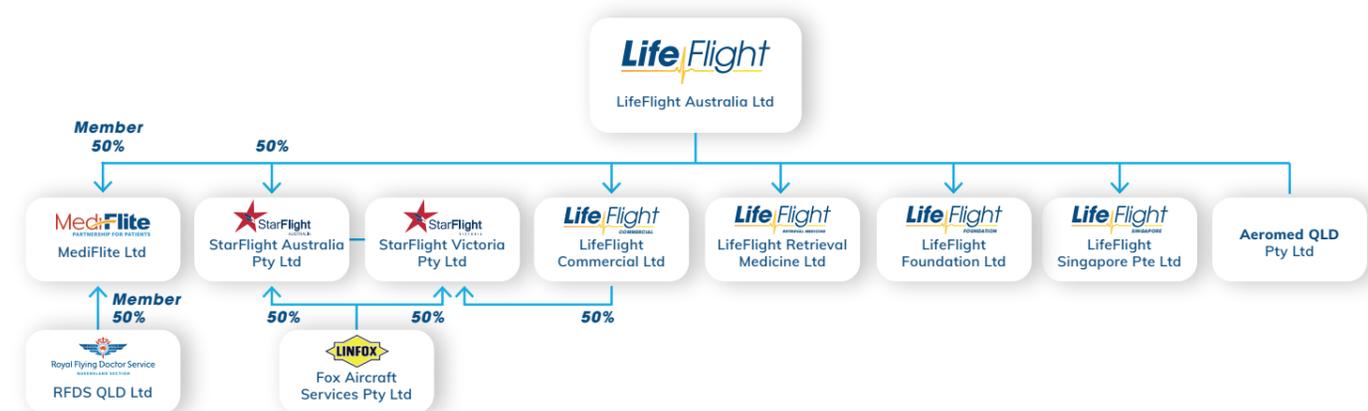
LifeFlight Commercial also provides training services to its group of companies and other air operators through the LifeFlight Training Academy. It provides world class aviation engineering and maintenance services to all the LifeFlight companies and to its joint venture partners StarFlight Australia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

- Aeromedical and retrieval services for Queensland Health;
- Aeromedical services to a consortium of gas companies in Queensland’s Surat Basin;
- Consultant level medical advice to Australian Maritime Safety Authority;
- Aircraft and engineering provision for Tasmania Department of Health aeromedical services (Rotor-Lift Aviation);
- Commercial repatriation services (governments and commercial companies);
- Dedicated jet air ambulance services into Asia Pacific;
- Aircraft and engineering provision for law enforcement and search and rescue services for the State Government of Victoria; and
- Provision of medical transport/Search and Rescue services for Defence exercises.

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

LifeFlight Australia Company Structure



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

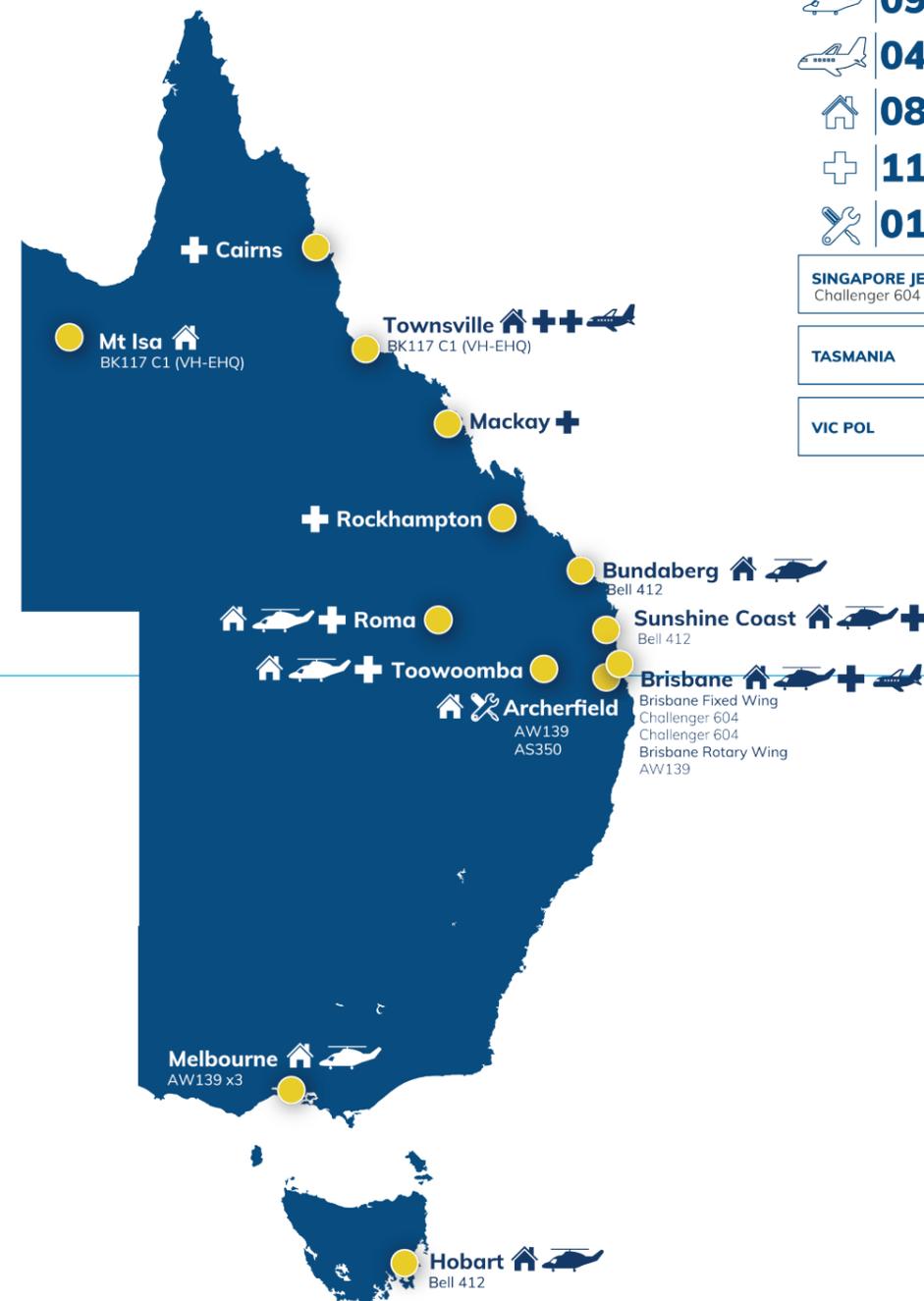
Our Assets and Bases

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. LifeFlight also operates a base in Singapore.

Asset and Bases

-  **09** Helicopters
-  **04** Jet air ambulances
-  **08** Operational bases
-  **11** LifeFlight Retrieval Medicine bases (including 3rd party bases)
-  **01** Engineering base

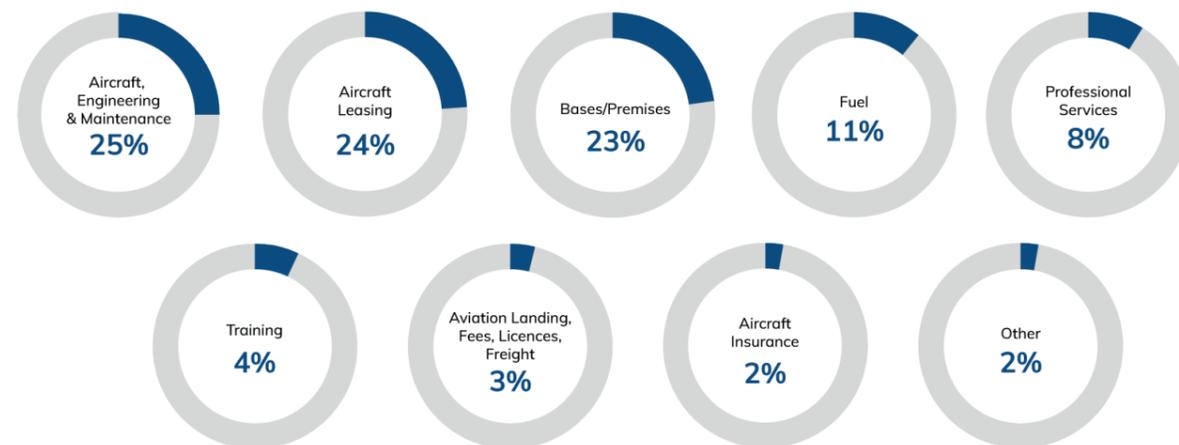
SINGAPORE JET BASE Challenger 604	1
TASMANIA	Bell 412
VIC POL	3 x AW139



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 2022-23 financial year spend profile by supply category is shown in the following diagram. By far our three largest areas of supplier spend relates to aircraft engineering and maintenance, aircraft leasing and bases.



Aircraft engineering and maintenance and aircraft leasing account for just under half of our supply chain in terms of supply category and percentage spend, sourced through Australian, American, Canadian, Irish, Singaporean and Italian companies.

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 2022-2023, Tier 1 suppliers comprised of Brisbane Airport Corporation, AerCap Holdings N.V. and Leonardo, who provided base and premises leasing, engineering and maintenance services, and aircraft leasing to LifeFlight.

Brisbane Airport Corporation Pty Ltd ("BAC") – the operator of Brisbane Airport, LifeFlight has a base at the airport, where both our helicopters and jet air ambulances operate from. BAC is developing a Queensland Regional Aeromedical Base, where LifeFlight will be a key tenant. In the 2022-2023 financial year, LifeFlight, through funding received from the Queensland Government, pre-paid costs to support the infrastructure build of the aeromedical base. BAC has a published Modern Slavery Statement under the Modern Slavery Statement Act 2018 (Cth) (www.bne.com.au).

AerCap Holdings N.V. – the world's largest owners of commercial aircraft and leader in aviation leasing. LifeFlight leases a number of rotary wing aircraft in our fleet through AerCap. AerCap does not publish a Modern Slavery Statement under the Modern Slavery Act 2018 (Cth).

Leonardo – including both Leonardo Australia Pty Ltd and Leonardo S.P.A, Leonardo designs, builds and maintains high performance commercial aircraft, with operations based in Italy. The company supplies aircraft engineering parts 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/).

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 2022-2023.

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 Modern Slavery Act 2018 (Cth) (www.ior.com.au).

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).

Newlands Commercial Construction ("NCC") – an Australian owned business located in Queensland, providing construction materials, machinery and equipment, consulting and support services. NCC were engaged by LifeFlight for an infrastructure build at our Roma base. While NCC is not required to report on Modern Slavery, they did complete LifeFlight's supplier questionnaire to provide transparency on their supply chain and values, and show their support of the Modern Slavery Act 2018 (Cth) (www.newlands.com.au).

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 world-wide. LifeFlight leases helicopters through LCI. LCI has not published a Modern Slavery Statement. (www.lciaviation.com).

Pratt & Whitney – a Canada-based aircraft engine manufacturer that provides aircraft engine maintenance for LifeFlight. Pratt & Whitney's parent company RTX Corporation has a published Modern Slavery Statement under Delaware, USA legislation (www.rtx.com).

Thales Australia – specialises in avionics and aerospace electronics and is the major maintenance, spares and systems supplier to the Australian Defence Force. Thales Australia has collaborated with LifeFlight to provide Flight Simulation training for specialist aviation crews. Its parent company Thales UK has a published Modern Slavery Statement under the United Kingdom Modern Slavery Act 2015 (www.thalesgroup.com).



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 Assessment 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 2022-23, LifeFlight assessed its potential supplier risks across its highest spend categories (Tier 1 and Tier 2 suppliers were reviewed and prioritised).

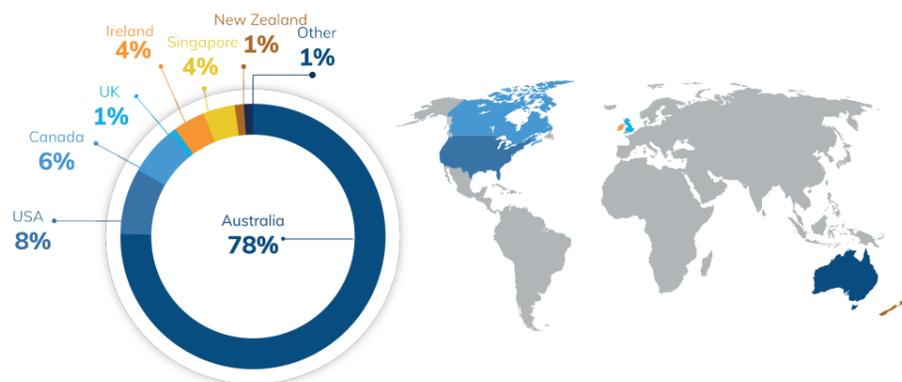
Potential risks for modern slavery were assessed according to:

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

Geographic location of services and suppliers

Over 75% of LifeFlight's supply spend is within Australia and almost 100% of its staff are domiciled here.

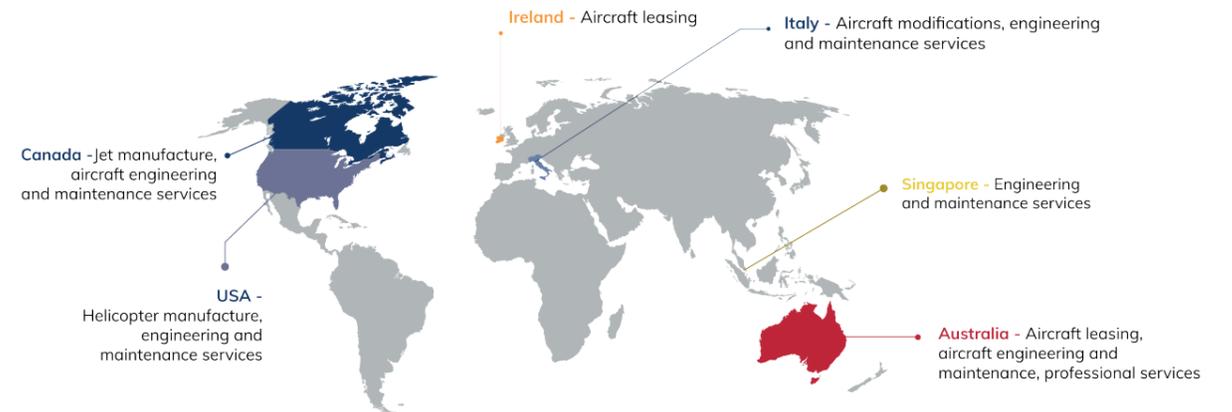
The largest service, by percentage spend, is for aircraft engineering and maintenance services. The maintenance of aircraft, and aircraft engines, is a highly regulated industry and in instances like engine maintenance, are part of a maintenance program directly with the aircraft manufacturer. LifeFlight 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. AerCap 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 supplies, parts and services directly from Leonardo, the global helicopter manufacturer based in Italy, and a Tier 1 supplier to LifeFlight. Ireland and Singapore are also large suppliers, by country of origin, supplying aircraft leasing through LCI Helicopters (Ireland) and World Fuel Services (Singapore). The category 'Other', at 1%, largely consists of aircraft landing fees payable to airports in New Zealand, Indonesia, Malaysia, Fiji, China and the UAE.

A majority of the Tier 1 and Tier 2 suppliers identified 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. A review of the Enterprise Risk Register by the Audit & Risk Management Committee ("ARMC") is completed quarterly. 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 identify any part of the supply chain that may be vulnerable to Modern Slavery risk. These proactive steps help recognise any exposure by LifeFlight to Modern Slavery practices.

6 Actions Taken in 2022-2023

This year LifeFlight focused on delivering a program of work to lay the foundations for future improvements, whilst elevating our maturity across governance, our staff and continued supply chain assessment. LifeFlight has also continued to evolve modern slavery risk management measures across our operations and supply chain.

Governance

- LifeFlight's Board is responsible for overseeing the effectiveness of LifeFlight's risk management systems and internal control, and approving the annual modern slavery statement. The Board's ARMC assist in that oversight by reviewing and considering modern slavery risk, and receiving updates from the Modern Slavery Working Group. The Modern Slavery Working Group comprises of representatives from the Risk and Assurance, Commercial, Finance and People & Culture teams.
- The Modern Slavery Working Group, convened by the Director of Health, Safety, Security and Environment ("HSSE") met bi-annually to track actions against a Modern Slavery program of works.
- LifeFlight's Risk Assessment Framework incorporates modern slavery risks with causes and controls identified in the Enterprise Risk Register, which is reviewed quarterly by the ARMC.

LifeFlight's current risk assessment for modern slavery did not identify any material industry sector or location.

WorkForce

- In 2022-23, LifeFlight's Code of Conduct was reviewed to more accurately reflects the company's expectations of staff, contractors and partners with regards to modern slavery and other human rights matters, unethical or illegal conduct.
- The company continued to deliver tailored training to build the capability of our staff to identify industries or locations which may pose greater modern slavery risks,
- Integrated e-learning modules were updated in company inductions and annual training of more than 350 staff heightened awareness of modern slavery prevention, LifeFlight's commitment within the Modern Slavery Statement and potential risks in LifeFlight's supply chain.

Policies and Supply Chain Assessment

- 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 continue to review our policies and procedures to ensure that modern slavery risks are highlighted and are appropriately addressed.

Specific actions undertaken FY23:

- Annual review of published Modern Slavery Statements by Tier 1 and Tier 2 suppliers. Suppliers not required to report on Modern Slavery, are requested to conduct a risk self-assessment in relation to modern slavery ("SAQ").
- 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 endeavours to include these expectations in supplier arrangements.
- Where reasonable and practicable, 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. Where possible, assessed new suppliers for modern slavery risk on the basis of key risk factors and review of their Modern Slavery Statement.

Monitoring and Reporting

- In line with our commitment to continuous improvement, LifeFlight developed and implemented more resources and processes to manage modern slavery risk in our alliances.
- Conducted bi-annual Modern Slavery Working Group meetings, to track actions against a modern slavery program of works.
- Increased reporting to the Board and sub-committees to view actions taken.



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. We aim for continuous improvement in managing modern slavery risk and, in FY24, turn our sights and preventative actions to impact measurement and stronger commitment to remediation.

In FY24 LifeFlight will use best endeavours to implement the below actions to strengthen our modern slavery prevention actions.

Modern Slavery Monitoring & Evaluation Framework

We will work towards the development of a Monitoring & Evaluation Framework that assesses the efficacy of our actions to prevent, mitigate, and address modern slavery related harm over time. This will include a bi-annual review of the Measurement and Evaluation framework and sharing key findings with LifeFlight management, LifeFlight ARMC and the Board, and report on the data in our FY24 Modern Slavery Statement.

The Modern Slavery Working Group will be overseen and convened by the Chief Financial Officer.

Remediation

LifeFlight had intentions in FY23 to develop a remediation policy; however, this was only considered. In FY24 we will endeavour to develop the remediation procedure. To accompany broader policy development, LifeFlight will implement good practice and processes.

Supplier Engagement Strategy and Review

LifeFlight will continue to implement the supplier engagement strategy, and consider the engagement of external consultants to help conduct supplier risk self-assessment in relation to Modern Slavery using a safe and secure platform. Where possible, the organisation will include contractual terms and conditions that require new suppliers to affirmatively agree to policy, and will work towards broadening to include flow-down clauses.

Collaboration and Consultation

LifeFlight is committed to working with and learning from suppliers and customers to continuously improve our understanding of modern slavery risks, controls and the evolving regulatory environment. LifeFlight will further train staff to identify product and services risks in the supply chain, with a focus on electronics and garments.

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 2022-2023.

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. Jim Elder
Chair (Non-executive)
LifeFlight Australia



Modern Slavery Statement 2022–2023

