

HMC Group Modern Slavery Statement

Introduction

1. This modern slavery statement (**Statement**) is provided according to section 13 of the *Modern Slavery Act 2018* (Cth) for the 2025 financial year reporting period (**Reporting Period**) by HM Consolidated Pty Ltd (ACN 168 632 791) (**HMC Pty Ltd**) and each of its wholly owned subsidiaries.
2. This is HMC Pty Ltd's first Statement, albeit the HMC Group has always been strongly committed to protecting human rights and has a well-developed corporate governance framework.

Structure, operations & supply chains

Structure and operations

3. HMC Pty Ltd is a privately-owned company that operates as the parent company, wholly owning the following group of aviation, tourism and hospitality brands:
 - 3.1. the entities that trade with the public are:
 - 3.1.1. Australian Helicopter Academy Pty Ltd (ACN 610 862 381) which is a helicopter pilot training business;
 - 3.1.2. Aviair Pty Ltd (ACN 009 145 055) trading as:
 - a. Aviair, which is an airline operating a fleet of small aircraft for regular passenger transport, charters and scenic flights; and
 - b. Nexus Airlines which is an airline operating a fleet of Dash 8 – Q400 aircraft for regular passenger transport and charters;
 - 3.1.3. Freshwater Quality Management Pty Ltd (ACN 141 510 045) which:
 - a. manages Freshwater East Kimberley Apartments which provides executive-style, self-contained accommodation in Kununurra (WA);
 - b. manages Bungle Bungle Savanah Lodge which provides eco-tourism cabins in the Purnululu National Park; and
 - c. The PumpHouse Restaurant which is a hospitality venue in Kununurra, WA;
 - 3.1.4. Helicopter Film Services Pty Ltd (ACN 076 712 831) trading as HeliSpirit which operates a fleet of helicopters for charters and scenic flights;

- 3.1.5. Northern Experiences Pty Ltd (ACN 605 977 142) trading as each of Kimberley Experiences and Pilbara Experiences which provides personalised holiday packages; and
- 3.1.6. Kimberley Cultural Tours Pty Ltd (ACN 610 862 381) trading as Bungle Bungle Guided Tours which is a tourism business provided guided walking tours in the Purnululu National Park; and

3.2. the entities which are corporate vehicles that do not trade with the public are:

- 3.2.1. HM Aircraft Holdings Pty Ltd (ACN 168 661 603) which owns aircraft and vehicles;
- 3.2.2. Infinity Aircraft Holdings Pty Ltd (ACN 656 133 907) which owns aircraft leases;
- 3.2.3. Infinity Operations Pty Ltd (ACN 656 133 916) which is a corporate vehicle; and
- 3.2.4. Karratha Flying Services (2008) Pty Ltd (ACN 127 916 607) which leases aircraft hangar property in Karratha (WA),

(together, the **HMC Group**).

- 4. The HMC Group head office is located at 319 Laine Jones Drive, Kununurra WA and also has offices in Broome, Karratha, Perth and South Australia and employs approximately 450 people at the height of the tourism season between April and September.
- 5. The maximum number of direct employees during the Reporting Period was 434 with a component of seasonal staff in the tourism and hospitality business of the HMC Group.

Supply Chain

- 6. In the Reporting Period the HMC Group worked with approximately 2,500 suppliers.
- 7. None of the HMC Group’s direct suppliers are from the ‘Walk free Foundation Global Slavery Index [2024]’ 10 countries with the highest prevalence of modern slavery.
- 8. The HMC Group supply chain also comprises the indirect suppliers that provide goods and services to the direct suppliers of the HMC Group.

Risks of modern slavery practices

- 9. The HMC Group acknowledges there are various risks of modern slavery within its operations and supply chains with the categories as potential higher risks being:
 - 9.1. agriculture and farming (in the context of sourcing food for in-flight catering and hospitality venues);

- 9.2. aircraft cleaning;
 - 9.3. catering (in-flight catering and hospitality venues);
 - 9.4. cleaning;
 - 9.5. ground handling;
 - 9.6. seasonal staff;
 - 9.7. textiles (such as aircraft upholstery);
 - 9.8. uniforms; and
 - 9.9. the organisations that mine, grow, extract and process raw materials that go into the items (and largely being aircraft parts) that the HMC Group purchases.
10. Some of the industries that the HMC Group relies on such as garment manufacturing, agriculture, and low-skilled labour services for mining, extracting and processing raw materials, are globally recognised as having a higher prevalence of exploitative labour practices.
11. The HMC Group is particularly focused on understanding risks of forced labour and debt bondage within these sectors.

Actions taken to assess and address risks

Due Diligence

- 12. The HMC Group conducts due diligence when onboarding new direct suppliers and sends a modern slavery questionnaire to selected suppliers based on a risk assessment.
- 13. The HMC Group has previously refused to onboard a potential clothing supplier that was unable to satisfy the HMC Group that the appropriate controls were in place across that supplier's supply chain with respect to modern slavery.

Policies

- 14. The HMC Group has the following policies which are internally reviewed periodically:
 - 14.1. Modern Slavery Policy which articulates the HMC Group's commitment to identifying, addressing and mitigating risks of modern slavery occurring in our operations or supply chain;
 - 14.2. Whistleblowing Policy which provides for all eligible whistleblowers to identify and address modern slavery risks and concerns; and
 - 14.3. Code of Conduct that all employees must follow.

Training

15. The HMC Group aims to roll out a training module about the HMC Group's expectations around modern slavery for all senior managers using the HMC Group's online learning management system.

Remediation

16. If the HMC Group was to become aware of a modern slavery issue it would be escalated to the Executive team, who would investigate and remediate it and would conduct a lessons learned process arising from the report.

How effectiveness of actions is assessed

17. The HMC Group is committed to continuous improvement.
18. Each of the internal Quality and Legal departments are tasked with reviewing the HMC Group's Modern Slavery practices and reporting to the Managing Director (and ultimately the Board) about continuous improvement actions. The Legal team is tasked with collating information concerning best practice, comparing the HMC Group's current practices to those benchmarks and reporting to the Managing Director.

Consultation

19. The HMC Group's corporate services functions (including the Legal, Finance and HR departments) service all group entities.
20. Further, the HMC Group's Board meetings are conducted at the parent company level (i.e. HMC Pty Ltd). Two of the directors of HMC Pty Ltd are also the only two directors of each of the subsidiary companies.
21. This Statement was prepared by HMC Group's Legal department in consultation with various parts of the business, including the HR department, the Finance department and operational personnel. Therefore, each entity in the HMC Group was, in effect, consulted about this Statement.
22. This Statement was approved by the Board on 23 December 2025.



Michael McConachy
Managing Director
31 December 2025