



Modern Slavery and Human Trafficking Statement 2020

This statement covers the activities of Bristow Helicopters Australia Pty Ltd ACN 000 565 579 and its controlled entities (together **BHA**) to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.



Introduction

Modern Slavery is a term is used to cover a variety of situations in which a person is forcibly or subtly controlled by an individual or a group for the purpose of exploitation. Modern slavery includes human trafficking, slavery, forced labour, removal of organs, and the sale or exploitation of children, as well as slavery-like practices such as servitude or serfdom, debt bondage, and servile forms of marriage.

BHA seeks to play a positive role in the communities where it operates by conducting itself in a way that respects human rights. It opposes any use of human trafficking or slavery in the provision of its services. It is committed to ensuring that its employees and suppliers take appropriate steps to mitigate such risks from occurring in all aspects of our supply chain.

This is the first Modern Slavery statement for BHA, as informed by the Federal Modern Slavery Act 2018 (Cth) (**Act**).

The purpose of this Statement, in compliance with the requirements of the Act, is to outline BHA's approach to ensuring that it has robust frameworks and processes in place to minimise the risk of modern slavery in its business operations and supply chain

BHA recognises that slavery and human trafficking can occur in many forms, as considered in the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services. Following a review of our operations and supply chain, we consider that the risks of modern slavery are remote in our business.

BHA is, however, fully committed to operating responsibly and establishing and adhering to the highest ethical standards across its group. It will not tolerate any forms of slavery or human trafficking in its business.

BHA supports the United Nations' Sustainable Development Goals, including Goal 8: decent work and economic growth. BHA strongly supports this goal with the commitment in working to eradicate the many forms of modern slavery.

Business

BHA offers transportation, search-and-rescue and aircraft-support services, including maintenance and training, to both government and civil customers.

BHA's operations began in 1967 as Mayne Helicopters, then in 1977 Mayne-Bristow Helicopters, before becoming Bristow Helicopters Australia Pty Ltd in September 1988. BHA's head office is in Perth, Western Australia with entities operating throughout Australia and to Dili, Timor-Leste.

Structure, Operations and Supply Chain

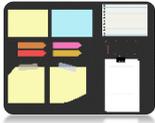
For the purposes of this statement, BHA's key operating entities and operations and the associated supply chains are as follows:

Entity	Main Operation	Supply Chain
 <p>Bristow Bristow Helicopters Australia Pty Ltd ACN 000 565 579</p>	<p>Delivering client services including:</p> <ul style="list-style-type: none"> • Employee transport to and from offshore vessels • Search and Rescue • Medevac 	<ul style="list-style-type: none"> • Office consumables • Promotional merchandise • IT and technology • Utilities • Professional services and consultants • Contractors (check-in, security, cleaners) • Uniforms and PPE • Aircraft • Aircraft components • Maintenance tools • Workshop/Maintenance consumables • Fuel • Accommodation • Transportation
 <p>Bristow Bristow Management Services Pty Ltd ACN 079 443 011</p>	<p>Delivering component maintenance and ground support services to the Royal Singapore Air Force.</p>	<ul style="list-style-type: none"> • Office consumables • IT and technology • Utilities • Contractors (such as cleaners) • Uniforms and PPE • Maintenance tools • Workshop/maintenance consumables
 <p>Bristow Bristow Travel Pty Ltd ACN 163 850 922</p>	<p>Delivering client services including:</p> <ul style="list-style-type: none"> • Travel bookings • Accommodation bookings • Car hire bookings. 	<ul style="list-style-type: none"> • Office consumables • IT and technology • Utilities • Contractors (cleaners) • Uniforms and work attire
<p>Asia Pacific Air Pty Ltd ACN 106 752 452</p>	<p>.Currently a dormant entity not providing services or operations.</p>	<ul style="list-style-type: none"> • Not applicable.
 <p>airnorth Capiteq Pty Ltd ACN 008 137 559</p>	<p>Delivering commercial and charter air transportation solutions.</p>	<ul style="list-style-type: none"> • Office consumables • Promotional merchandise • IT and technology • Utilities • Professional services and consultants • Contractors (check-in, security, cleaners) • Uniforms and PPE • Aircraft components • Aircraft • Maintenance tools • Workshop/maintenance consumables • Fuel • Accommodation • Transportation

Suppliers

BHA sources goods and services from a vast range of suppliers, both within Australia and abroad.

Its major categories of procurement include:

	Office consumables		Promotional merchandise		IT and technology
	Utilities		Professional services and consultants		Contractors
	Uniforms and PPE		Aircraft		Aircraft components
	Maintenance tools		Workshop & maintenance consumables		Fuel
	Accommodation		Transportation		

The places from which BHA sources products, parts and services include Australia, the UK, the USA, Nigeria, Norway, France, Italy, and China.



Potential Risks in Operations and Supply Chains

BHA employs highly skilled persons such as pilots and engineers, and, as such, it believes that the risk of human trafficking and slavery within its business is low. Regardless, BHA will continue to evaluate the risks on a periodic basis.

BHA contracts with a number of suppliers for various goods and services in support of its operations. Specifically, BHL acquires, through a global supply chain network, spare parts, components and consumables from aviation manufacturers and suppliers. These parts and components are supplied by reputable and international companies subject to very high safety and compliance standards. Nevertheless, there may be risks that the manufacture or supply of some of the aviation parts and components may contribute to modern slavery practices. Although BHA is not aware of such practices, it will continue to act in accordance with legal requirements and conduct due diligence on its suppliers.

Addressing the Risk of Modern Slavery Practises

Among BHA's most cherished assets are its Core Values and Code of Business Integrity (**COBI**). Through COBI, BHA has committed itself to upholding the principles of the United Nations' Universal Declaration of Human Rights, including non-discriminatory treatment, voluntary employment, freedom of association, minimum wage, anti-harassment training, prohibiting forced or child labour, and maintaining a healthy and safe work environment

All BHA employees, as part of their employment terms, are subject to the provision of BHA's Employee Handbook. The handbook includes a section on Anti-Human Trafficking, which prohibits trafficking, slavery, and slavery-like practices, as well as deceptive recruitment, and compels employees to report any violations. Specifically BHA employees, and the employees of subcontractors performing work for BHA, must never commit the following acts:

1. engage in any form of trafficking in persons;
2. procure commercial sex acts;
3. use forced labour;
4. deny access to employees' and contractors' identity or immigrations documents;
5. use misleading or fraudulent practices during the recruitment of employees;
6. charge recruitment fees to employees;
7. fail to enable employees to return to their home country at the end of their employment;
8. fail to provide housing that meets acceptable housing and safety standards;
9. fail to provide relevant work documents in writing.

In order to address and mitigate any risks of modern slavery practices in its business, BHA, working with its international Bristow affiliates, shall develop a global modern slavery policy which ensures that proper procedures are put in place within its operations and supply chain, both within and outside Australia, in compliance with the requirements of the Act.

BHA employees must immediately report any violations of this Statement, applicable company policy, and COBI to their manager, the Chief Compliance Officer, or their regional Legal Counsel. BHA employees may also report anonymously through its Safety and Ethics Hotline.

As a condition of doing business with it, BHA requires all of its suppliers to agree in writing to comply with COBI and the policies and standards contained therein. Any employee or supplier found in violation is subject to adverse action, up to and including termination of their employment or contract. Over the reporting period, BHA has also incorporated, where appropriate, anti-slavery provisions in its contracts with its customers and suppliers.

Quantitative and Qualitative Evaluation

BHA is predominantly a service provider and is committed to leading by example. BHA demonstrates to its own customers and stakeholders that it sets and operates to the highest standards, acting ethically and responsibly at all times. Accordingly, it expects the same from its customers and third parties, including suppliers, contractors and consultants (**Third Parties**). BHA only engages with Third Parties that adhere to the values that BHA upholds and requires these Third Parties to act ethically and with integrity at all times, sharing BHA's commitment to safe and humane working practices. As part of BHA's continued analysis of its Third Parties, it monitors its supply chain as part of its modern slavery risk assessment and due diligence process. When required and where appropriate, all Third Parties are expected to demonstrate and provide evidence of the standards they adhere to, which may include audits and independent verification of standards.

Modern slavery risks are included on BHA's risk register, which enables periodic reviews of its BHA's risk-management procedures and provides clear visibility by BHA's officers and senior management. Risk profile variations and enhanced mitigation measures are captured as part of this process. The results of risk-register reviews are reported to BHA's board.

Consultation

BHA has prepared this Statement with input from both its regional entities and also its centralised corporate support functions, which are responsible for supporting all group entities including the following functions:

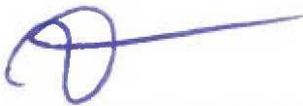
- Supply chain and procurement;
- Finance;
- Commercial; and
- Legal/Compliance.

Future Commitments

BHA aims to ensure that its ethical and legal obligations and responsibilities in relation to modern slavery remain at the forefront of the minds of its employees and Third Parties. It is committed to keeping its supply chains under review to identify and monitor ongoing and future risks.

Approval

This Statement has been approved by the Board of Directors of BHA and signed on behalf of all of the entities comprising BHA by Daniel Bowden, Director.



For questions relating to this statement:

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