# AUSTRALIA – MODERN SLAVERY ACT STATEMENT

### Introduction

This Modern Slavery Statement is jointly made by Bristow Helicopters Australia Pty Ltd (**BHAPL**) and Capiteq Pty Limited (trading as Airnorth) (**Airnorth**) for the financial year ending 31 December 2022. BHAPL and Airnorth doing business in Australia and Airnorth doing business in Timor Leste, are committed to playing a positive role in the communities in which we operate by maintaining a healthy and safe work environment and respecting human rights. These principles are embedded in BHAPL and Airnorth's Core Values and in our Code of Business Integrity (**COBI**). We meet our commitments by taking a zero-tolerance approach to the use of human trafficking or slavery and encouraging and influencing others to do the same.

## Structure, Operations and Supply Chains

Airnorth, one of BHAPL subsidiaries, is a regional airline based at Darwin International Airport, Northern Territory, Australia, and has a regional office in Perth Western Australia. Airnorth operates both scheduled and charter services in the Northern Territory, Western Australia, Queensland, and Dili (Timor-Leste) and carries over 300,000 passengers per year.

Airnorth contracts with a broad range of reputable suppliers to ensure the safety of our employees and passengers. In addition to ground handling and aviation-support services, our supply chain includes manufacturers and others involved in the operations of fixed-wing aircraft, aircraft parts and components, and technology-solutions providers.

### Identifying and Assessing Modern Slavery Risks

As a provider of commercial aviation services, Airnorth relies on a highly skilled workforce (e.g., pilots, maintenance engineers, ground handling). Similarly, given the inherent necessity for precision and the knowledge of the complexities of aircraft components, our supply-chain partners must also rely on a capable and experienced workforce. Accordingly, we do not believe the aviation industry to be high risk for slavery or human trafficking, and BHAPL and Airnorth take a risk-based approach when conducting due diligence on our business partners.

#### **Our Commitment to Address Risks of Modern Slavery Practices**

BHAPL and Airnorth align our core human rights values to the principles of the United Nations Universal Declaration of Human Rights, which includes nondiscriminatory treatment, voluntary employment, freedom of association, payment of a minimum wage, anti-harassment, and prohibiting forced or child labor. We address these risks through policies, specific contractual provisions, training and awareness, and due diligence.

- Our COBI and *Human Rights and Antislavery Policy* explicitly prohibit the use of slavery and human trafficking in our supply chain and requires that our employees and suppliers take appropriate steps to mitigate slavery and human-trafficking risks, including, child or forced labour, human trafficking, adherence to labour laws, freedom of association and movement, and the payment of fair wages.
- Employees and suppliers found to have violated these standards are subject to adverse action, up to and including termination of their services.
- As a condition of engagement, our contract templates, including those specific to the purchasing of good and services, include provisions relating to slavery, trafficking, and adherence to labour laws.
- Prior to onboarding, each of our suppliers is screened against restricted party lists and reviewed for negative media attention.

- Employees must report actual or suspected violations of applicable modern slavery laws immediately, either to their supervisors, the Compliance Department, or through our Ethics and Compliance Hotline.
- At the time of hire and annually thereafter, employees are required to take ethics-and-compliance training, which includes a section on modern slavery.
- Prior to onboarding, each of our suppliers is screened against restricted party lists and reviewed for negative media attention.

#### Assessing the Effectiveness of our Actions

BHAPL and Airnorth are currently engaged in an assessment of: (1) our exposure to modern slavery risks and (2) the effectiveness of our current actions. The goal is to improve our ability to identify, prevent, and mitigate risk. Examples of anticipated enhancements include:

- Mapping and risk-ranking our supply chain;
- Implementing the use of key performance indicators; and
- Integrating automated steps in supply-chain processes.

BHAPL and Airnorth are committed to improving our modern slavery compliance program, and we will continue to assess best practices and adopt those that strengthen our approach and effectiveness.

#### <u>Approval</u>

During the reporting period this statement covers, BHAPL and Airnorth actively engaged and consulted with all companies we own or control in the development of this statement (entities outlined in Attachment A). We discussed details of the *Modern Slavery Act* 2018 *(Cth)*'s reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates. BHAPL and Airnorth are supported by a number of Bristow Group Inc. affiliate companies in various functions, including ESG, Legal and Compliance, and Sourcing/Procurement – functions involved in assessing and addressing modern slavery risks. These teams work with one another collaboratively on the risks and processes reflected in this statement.

This Statement is made in accordance with the Australian *Modern Slavery Act* 2018 *(Cth)* and has been approved by the board of directors of BHAPL on behalf of itself and Airnorth as parent entity on 17 May 2023. It constitutes BHAPL and Airnorth's modern slavery statement for the fiscal year ending on 31 December 2022.

Signed,

Daniel Bowden Bristow Helicopters Australia Pty Ltd

# Attachment A

Short form	Name of Company	ABN number
	Drietow Helicoutore Australia Dty Ltd	
BHAPL	Bristow Helicopters Australia Pty Ltd	92 000 565 579
Airnorth	Capiteq Pty Limited (trading as Airnorth)	24 008 137 559
	Bristow Management Services Pty Ltd	24 079 443 011
	(Business name: Bristow Defence Industries)	
	Aircrew Logistics Pty Ltd	86 009 607 103
	Aircraft Logistics Pty Ltd	72 009 628 111