



StarFlight
AUSTRALIA



Modern Slavery Statement

2022-2023

From the Chair

Since publishing our first Modern Slavery Statement ("Statement") in 2020, StarFlight 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 StarFlight 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 StarFlight

StarFlight Australia Pty Ltd and StarFlight Victoria Pty Ltd ("StarFlight" or "Company") are fully integrated service providers of law enforcement, search and rescue and emergency response aviation services. StarFlight was established by two iconic Australian organisations, LifeFlight Australia ("LifeFlight") and Fox Aircraft Services, part of the Linfox Group. StarFlight Australia and StarFlight Victoria share a common Board of Directors.

StarFlight is committed to treating its workers, suppliers and partners with dignity and respect, ensuring safe working conditions and conducting environmentally responsible, ethical operations. Our commitment reflects the Company's dedication to the highest air transport safety standards in the world, to realise our Vision and Mission.

Our Vision

Deliver aviation solutions for law enforcement, defence and emergency response services, that save lives.

Our Mission

Provide tailor-made solutions for complex aviation challenges across Australia.

This Statement is made on behalf of StarFlight Australia Pty Ltd (ABN 67606170414) and its affiliate StarFlight Victoria Pty Ltd (ABN 96623868315), under the Modern Slavery Act 2018 (Cth). It covers the financial year from 1 July 2022 to 30 June 2023.

This Statement is made voluntarily. It sets out the actions taken by StarFlight during the period to establish systems and internal awareness to prevent, detect and respond to modern slavery within our business and supply chains.

StarFlight has a master supplier agreement with LifeFlight Australia, a shareholder in StarFlight Australia. By virtue of LifeFlight's centralised management structure, the consultation process included all partners facilitated by a Modern Slavery Working Group who oversee preparation of the Statement and include key representatives to ensure a cross-functional view.

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' and 'our', it is a reference to StarFlight.

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

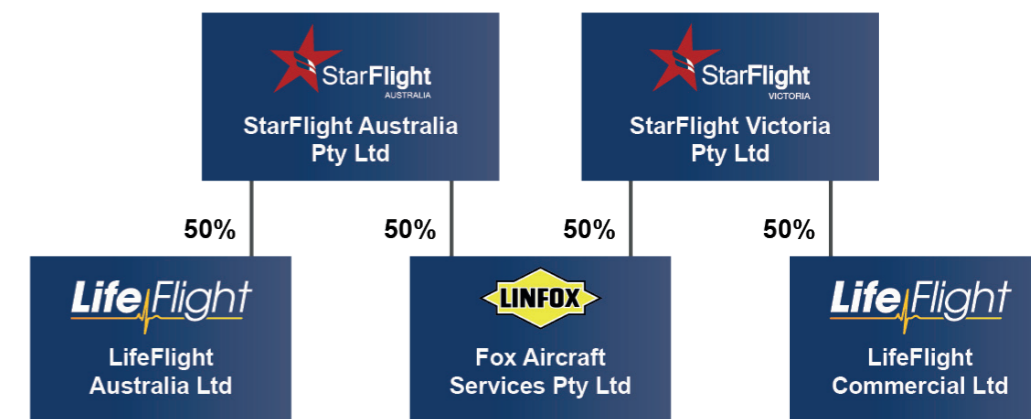
2 Our structure and our operations

StarFlight provides law enforcement, search and rescue and emergency response aviation services in Australia.

StarFlight is a company domiciled in Australia and owned equally by Shareholders LifeFlight and Fox Aircraft Services. StarFlight Australia is owned equally by LifeFlight Australia Limited (ABN 45010316462) and Fox Aircraft Services Pty Ltd (ABN 85627090813), part of the Linfox Group of Companies. StarFlight Victoria is owned equally by LifeFlight Commercial Limited (ABN 91627081930) and Fox Aircraft Services. StarFlight brings together the aviation experience, expertise and infrastructure of the LifeFlight companies and the unequalled aviation logistics supply and support capability of the Linfox Group.

StarFlight has neither partially nor wholly-owned subsidiaries.

StarFlight Company Structure

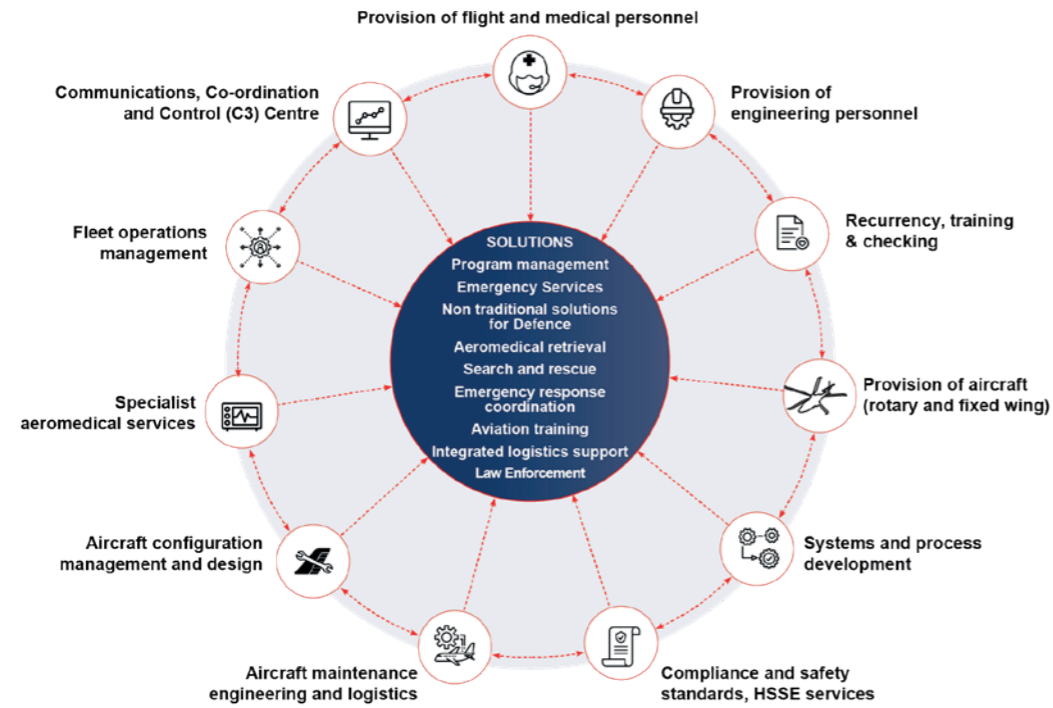


Founded in 2017 to deliver high-end aviation solutions, StarFlight, through a master supplier agreement with LifeFlight, employs some of the most qualified aviation and logistics professionals in the world including flight crews, engineering personnel, safety and systems specialists and program managers.

StarFlight's head office is located in Brisbane, with access to an extensive fleet of helicopters and fixed wing aircraft from ten established bases on the east coast of Australia.

The company draws on LifeFlight's nationally-recognised expertise as a leader in 24/7 rapid response helicopter and fixed wing support for emergency response services, providing specially configured aircraft, missions systems and engineering and maintenance support to the Victoria Police Air Wing as well as access to a training academy for pilot and air crews.

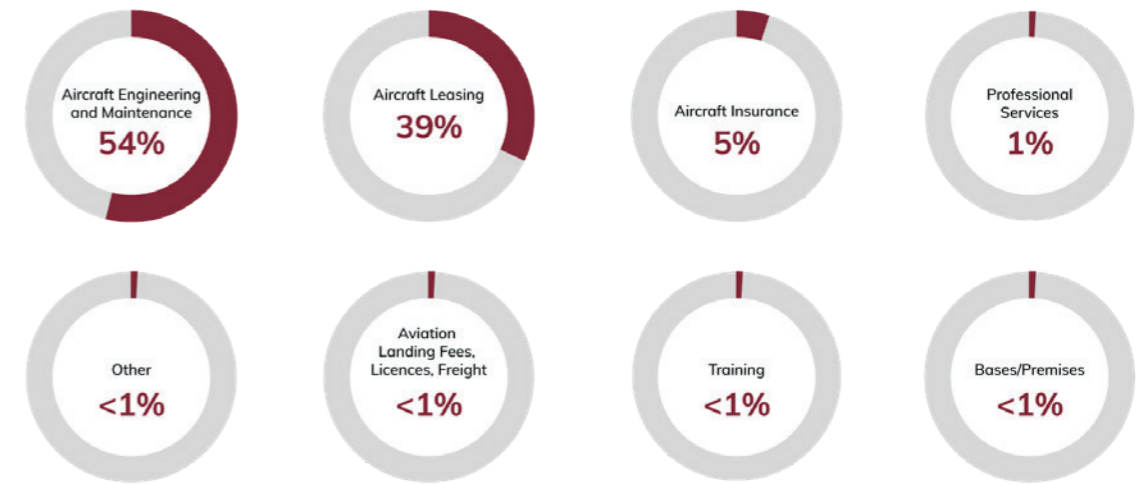
Through a master supplier agreement with LifeFlight, StarFlight's capabilities, and its access to assets and bases, are shown in the following diagrams.



3 Understanding our supply chain

Our value chain consists of suppliers who provide services directly to StarFlight, such as the leasing of specialist helicopters, aircraft modifications, aircraft mission systems, surveillance technologies, aviation engineering and maintenance, and flight training.

StarFlight's 2022-2023 spend profile by supply category is shown in the following diagram. Aircraft engineering and maintenance is the single largest supply category, representing 54% of the company's total spend in the past 12 months. Aircraft leasing is the second largest supply at 39%. Together these costs account for over 90% of our supply chain in terms of supply category and percentage spend.



StarFlight had five Tier 1 and Tier 2 suppliers in 2022-2023. Tier 1 suppliers are defined as those who provide the highest proportion (by value) of leasing and aircraft engineering and maintenance annually. Tier 2 suppliers provide the second highest proportion (by value) of supplies and also include engineering, as well as aviation insurance.

The single largest supplier is aircraft leasing, which is currently through AerCap Holdings N.V, one of the world's largest owners of commercial aircraft and leader in aviation leasing.

All five Tier 1 and Tier 2 suppliers have in place published Modern Slavery Statements applicable to their jurisdictions and governing their procurement of goods and services.

Tier 1 suppliers

1. **AerCap Holdings N.V. ("AerCap")** – The world's largest owners of commercial aircraft and leader in aviation leasing. StarFlight 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) (www.aercap.com).



2. **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 Australia and Italy. The company is the manufacturer of a number of helicopters in StarFlight's fleet and supply StarFlight with aircraft supplies and parts. Leonardo has a published Modern Slavery Statement commensurate with European laws (www.leonardo.com/en/).

Tier 2 suppliers

1. **LifeFlight Australia** - one of the world's leading aeromedical and retrieval companies and joint owner of StarFlight. LifeFlight provides aircraft engineering and maintenance, flying operations training and checking services, and flying operations support services. Health, Safety, Security and Environment ("HSSE") support and provide professional services to StarFlight. LifeFlight has a published Modern Slavery Statement under the Modern Slavery Act 2018 (Cth) (www.lifeflight.org.au).
2. **Pratt & Whitney** – a Canada-based aircraft engine manufacturer that provides aircraft engine maintenance for StarFlight Pratt & Whitney's parent company RTX Corporation has a published Modern Slavery Statement under Delaware, USA legislation (www.rtx.com).
3. **Aviation Insurance Australia** - an aviation insurance and helicopter insurance broker providing StarFlight with specialist insurance for the rotary wing fleet. Aviation Insurance Australia's parent company, Arthur J Gallagher & Co (Aus) Limited, has a published Modern Slavery Statement under the Modern Slavery Act 2018 (Cth) (www.ajg.com.au).

4 Our position on Modern Slavery

StarFlight is committed to safe workplaces and to limiting the risk of modern slavery within our business and supply chain.

The company seeks 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. In addition, as a StarFlight partner, the Linfox Group also publish their own separate Modern Slavery Statement, bolstering StarFlight's position in this regard.

StarFlight is committed to modelling our own values in the way we work 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 Values



Our Non-Negotiable Principles

To ensure that we align our risk management activities with the company's values, StarFlight refers to overarching Non-Negotiable Principles in its Risk Assessment Framework. These principles help to set StarFlight's expectations not just for what work needs to be delivered, but how we expect business to be conducted. They are:

- 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 StarFlight's reputation, brand, property, assets and information
- we proactively manage risk

5 Potential risks within our operations and supply chain

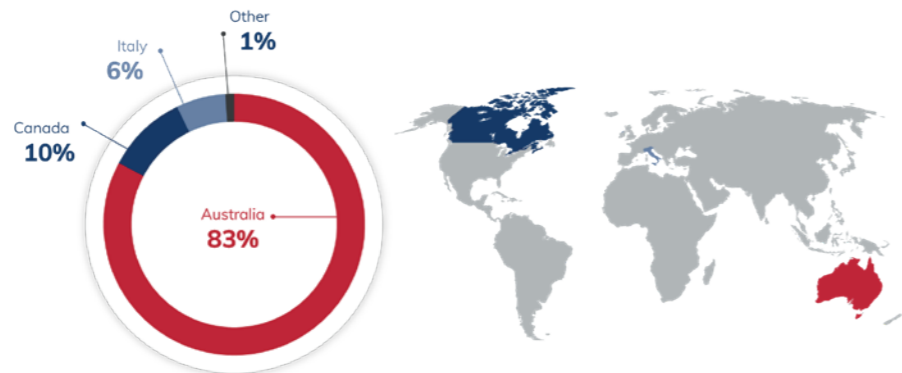
During 2022-2023, StarFlight assessed its potential supplier risks across its highest spend categories (Tier 1 and Tier 2 suppliers were reviewed and prioritised).

Potential risks for modern slavery were assessed according to:

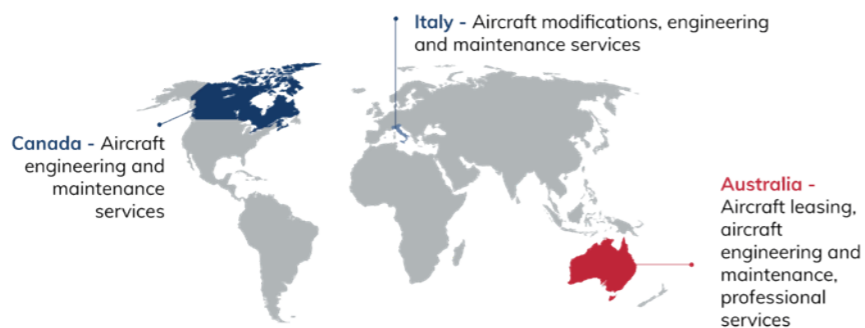
- geographic location of services and suppliers
- industry sector
- product or service

Geographic location of services and suppliers

All StarFlight’s workforce is employed in Australia. In addition, where StarFlight accesses LifeFlight specialists, they are sourced from existing Australian workforces. Over 80% of StarFlight’s supply spend is within Australia. The single largest category by percentage of supply spend is aircraft leasing, through Australian based leasing organisations.



The two largest geographic regions, outside of Australia, are Canada (Pratt & Whitney) and Italy (Leonardo). Companies in these two regions provide aircraft engineering supplies and aircraft, respectively.



Industry sector and product or service

As a leading aviation and emergency services provider, StarFlight, through a master supplier agreement with LifeFlight, operates under a Quality Management System which is accredited with the provision of International Standard ISO 9001: 2015. StarFlight 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 aircraft are released or services are delivered and is a continuous process to ensure quality improvement as well as compliance.

StarFlight 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 StarFlight 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.

Nonetheless, 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, StarFlight’s Risk Assessment Framework, through its master supplier agreement with LifeFlight, has been updated to incorporate 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 Board is completed biannually. 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.



6 Actions Taken in 2022-2023

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

Governance and Responsibility

StarFlight's Board is responsible for overseeing the effectiveness of the risk management systems and internal control, and approving the annual modern slavery statement. The Modern Slavery Working Group provides updates to the Board. The Modern Slavery Working Group comprises of representatives from LifeFlight Australia and StarFlight, combining experience across Risk and Assurance, Commercial, Finance and HR functions.

Specific actions undertaken in 2022-2023

- The Modern Slavery Working Group, convened by the Director of Health, Safety, Security and Environment met biannually to track actions against a Modern Slavery program of works.
- StarFlight's Risk Assessment Framework incorporates modern slavery risks with causes and controls identified in the Enterprise Risk Register, which is reviewed biannually by the Board.

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

WorkForce

StarFlight's Code of Conduct reflects the company's expectations of staff, contractors and partners with regard 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 LifeFlight and StarFlight company inductions and annual training of more than 350 staff heightened awareness of modern slavery prevention, StarFlight's commitment within the Modern Slavery Statement and potential risks in the supply chain.

Policies and Supply Chain Assessment

StarFlight's policy suite, including a Modern Slavery Policy, incorporates the company's expectation and assists StarFlight 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 clients 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 2022-2023

- Annual review of published Modern Slavery Statements by Tier1 and Tier 2 suppliers. Suppliers not required to report on Modern Slavery, were requested to conduct a risk self-assessment in relation to modern slavery ("SAQ").
- A Modern Slavery Policy and 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. StarFlight uses best endeavours to include these expectations in supplier arrangements.
- Where reasonable and practicable, communication with new and existing suppliers to ensure awareness of StarFlight'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, StarFlight developed and implemented more resources and processes to manage modern slavery risk in our alliances.
- Conducted biannual 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 2023-2024, turn our sights and preventative actions to impact measurement and stronger commitment to remediation.

In 2023-2024 StarFlight 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 biannual review of the Measurement and Evaluation framework and sharing key findings with StarFlight management and the StarFlight Board, and report on the data in our 2023-2024 Modern Slavery Statement.

The Modern Slavery Working Group will be overseen and convened by LifeFlight's Chief Financial Officer.

Remediation

StarFlight had intentions in 2022-2023 to develop a remediation policy; however, this was only considered. In 2023-2024 we will endeavour to develop the remediation procedure. To accompany broader policy development, StarFlight will implement good practice and processes.

Supplier Engagement Strategy and Review

StarFlight 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

StarFlight 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. StarFlight will further train staff to identify product and services risks in the supply chain, with a focus on electronics.

8 Authorisation

StarFlight is committed to ensuring our organisation and supply chain operates with integrity and without exploitative practices. We strongly oppose modern slavery in all its forms.

The Board of StarFlight has authorised and approved the publication of the Modern Slavery Statement 2022-2023. StarFlight 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.



Dennis Richardson AC
Chair of StarFlight Australia
Chair of StarFlight Victoria



Modern Slavery Statement 2022-2023

