



StarFlight
AUSTRALIA



Modern Slavery Statement

2021-2022

Our Values

Safety

We prioritise our safety and that of our customers, our partners and our communities above all else, and we embrace safety continuous improvements to our assets, our systems and our processes.

Respect

We uphold the dignity and rights of those inside and outside of StarFlight, and have regard for their views, well-being and dignity.

Dependability

We make and keep realistic promises, and we step up to help those in need.

Courage

We willingly confront challenging and difficult situations to deliver our commitments and provide critical aviation services and care.

Integrity

We follow our principles, no matter the situation, and we share an uncompromising commitment to honest interactions.

While StarFlight Australia Pty Ltd and StarFlight Victoria Pty Ltd have endeavoured to ensure that all information provided in this publication is accurate and up-to-date at the time of this publication, the companies take no responsibility for any error or omission relating to this information. Furthermore, the information provided shall not constitute financial product advice pursuant to the Australian Financial Services Licence held by the companies' related bodies corporate. To the maximum extent permitted by law, the companies will not be liable for any cost, loss or damage (whether caused by negligence or otherwise) suffered by you through your use of this publication.



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 (SAR) 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 joint venture owners 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 2021 to 30 June 2022.

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.

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.

StarFlight acknowledges transparency breeds trust. We wish to advise a delay in reporting due to an oversight. Statements were due 31 December 2022. This statement was submitted 30 June 2023.

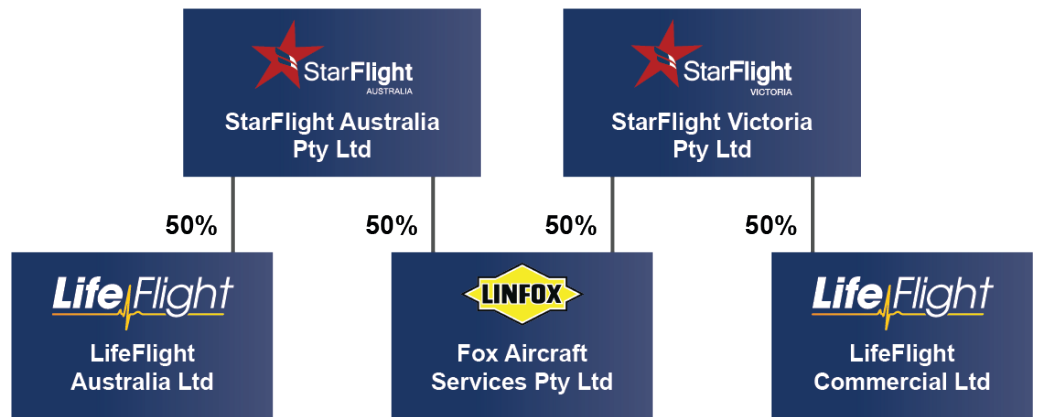
2 Our structure and our operations

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 Australia Company Structure

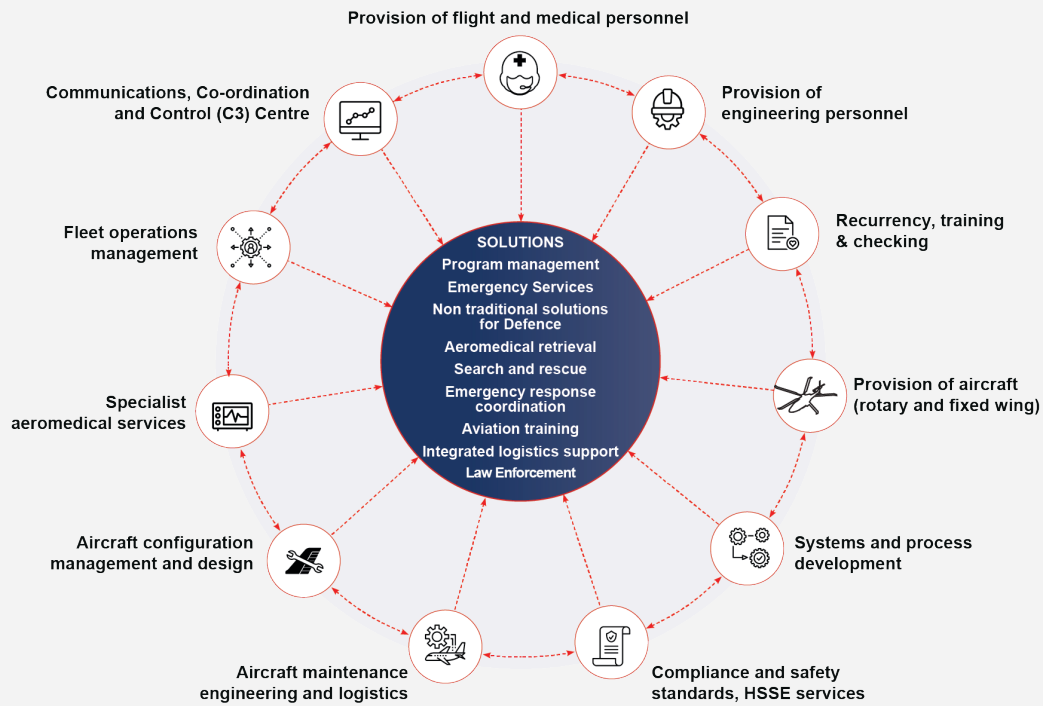


Founded in 2017 to deliver high-end aviation solutions, StarFlight, through a master supplier agreement with LifeFlight, employs some of the most qualified aviation and logistics professionals in the world including flight crews, engineering personnel, safety and systems specialists and program managers.

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 (VICPOL) 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.



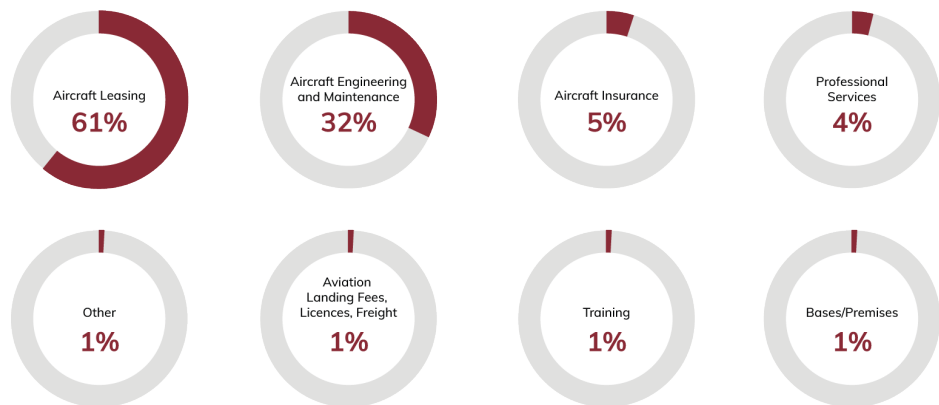
Serving Australia, StarFlight is a private company with a strong community focus. Fifty percent of all StarFlight profits are directed back into LifeFlight Australia to fund its emergency aeromedical rescue and retrieval services to communities in Australia.

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 2021-2022 spend profile by supply category is shown in the following diagram. Aircraft leasing is the single largest supply category, representing 61% of the company's total spend in the past 12 months. Aviation engineering and maintenance is the second largest supply at 32%. Together these costs account for over 90% of our supply chain in terms of supply category and percentage spend.

Percentage 2021-2022 spend by contract categories



StarFlight had five Tier 1 and Tier 2 suppliers in 2021-2022. Tier 1 suppliers are defined as those who provide the highest proportion (by value) of engineering, assets, logistics and corporate services annually; Tier 2 suppliers provide the second highest proportion (by value) of goods and services annually.

The single largest contract category is aircraft leasing, through an Australian based leasing organisation. However, reflecting the spirit of the Modern Slavery Act, and for the purposes of this Statement, we have included the international aircraft manufacturer in our reporting and due diligence processes.

Aircraft manufacturer Leonardo Company is also identified as a provider of engineering and maintenance services to StarFlight. 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 supplier

1. **GE Capital Aviation Services Australia (acquired by AerCap in Nov 2021)** – the world's largest owners of commercial aircraft and leader in aviation leasing, through which StarFlight leases rotary wing aircraft. GECAS have published a Modern Slavery Statement under the Australian Commonwealth Modern Slavery Act; however AerCap has not. While there is a relatively low business sector risk, we are committed to increasing supplier engagement and assessment of modern slavery risk.

Tier 2 suppliers

2. **Leonardo** – designs, builds and maintains high performance commercial aircraft, at operations based in Italy. The company supplies aircraft services direct to StarFlight, and is the manufacturer of a number of helicopters in StarFlight's fleet. Leonardo has a published Modern Slavery Statement commensurate with European laws (www.leonardo.com/en/).
3. **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, flying operations support services, HSSE support and professional services to StarFlight. LifeFlight has a published Modern Slavery Statement under the Modern Slavery Act 2018 (Cth) (www.lifeflight.com.au).
4. **Pratt & Whitney** – is a Canada-based aircraft engine manufacturer that provides aircraft engine maintenance for LifeFlight. Pratt & Whitney's parent company Raytheon Systems Ltd has a published Modern Slavery Statement under UK modern slavery legislation (www.raytheon.com).
5. **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 Arther 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.

StarFlight is committed to modelling our own values in the way we work (as shown 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 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 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 2021-2022, 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

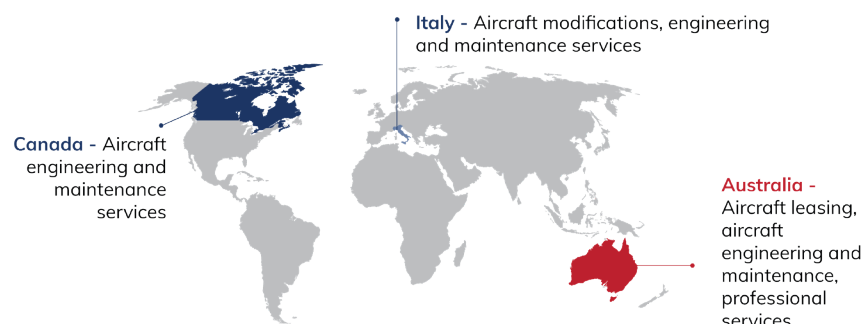
Geographic location of services and suppliers

All StarFlight’s workforce is employed in Australia. In addition, where StarFlight accesses LifeFlight specialists, they are sourced from existing Australian workforces. Close to 75% 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 second largest category is aircraft engineering and maintenance performed by LifeFlight Australia and aircraft manufacturer, Leonardo in Italy.

StarFlight’s aircraft insurance (the third largest percentage spend by supplier category) are provided by Aviation Insurance Australia.



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. Quarterly review of Enterprise Risk Register by ARMC. 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.





Actions Taken in 2021-2022

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. 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 use best endeavors to include these expectations in supplier arrangements.

StarFlight's policy suite incorporate the company's expectation and assist 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 patients and communities we assist. We will continue to review our policies and procedures to ensure that modern slavery risks are highlighted and our appropriately addressed.

Additionally, during 2021-2022, StarFlight focused on improved corporate governance, workforce and supply chain engagement, supply chain analysis and improved reporting to prevent, detect and respond to modern slavery within our own operations and supply chains.

Governance

Our Board is responsible for overseeing and approving the annual modern slavery statement. It receives updates from the Modern Slavery Working Group, who oversee the monitoring and review of modern slavery risk. The Group, comprising of representatives from Risk and Assurance, Commercial and P&C teams, report to the LifeFlight Risk and Audit Committee.

- Biannual meetings of the Modern Slavery Working Group, convened by the Director of HSSE. LifeFlight's Risk Assessment Framework incorporates Modern Slavery risks. Causes and controls are identified in the Enterprise Risk Register. Quarterly review of Enterprise Risk Register by ARMC.
- StarFlight's current risk assessment for modern slavery has not identified any material industry sector or location.

WorkForce

- Training and awareness programs delivered by the People & Culture (P&C) team, and incorporation into StarFlight's Code of Conduct and formal inductions for new staff to achieve internal awareness of Modern Slavery prevention, the commitments within StarFlight's Modern Slavery Statement and potential risks in StarFlight's supply chain.
- Education of commercial contracting staff to identify industries or locations which may pose greater Modern Slavery risks and should be targeted for immediate attention.

Policies and Supply Chain Assessment

- Implementation of the Contracting and Procurement Policy.
- 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.
- New supplier contracts include our expectations with regards to Modern Slavery.
- Additional due diligence undertaken with commencement of supplier self-assessment questionnaire (SAQ) in Q4, 2021. The intention of the SAQ was to gather, document and review the following supplier information to assess and mitigate Modern Slavery supply chain risks and maintain a responsible and transparent supply chain going forward. Due to a lack of supplier engagement in Q4 2021, the SAQ will be again distributed in 2022-2023. Results will be provided in StarFlight's Modern Slavery Statement 2022-2023.
 - Supplier details
 - Parent company details
 - Modern Slavery Statement "Y/N"
 - Approach to dealing with Modern Slavery
 - Visibility of supply chain - by types of goods and services and country of origin
 - Due diligence in screening suppliers
 - Due diligence/governance checks undertaken by supplier

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. In 2022-2023 StarFlight will use best endeavours to implement the below actions to strengthen our modern slavery prevention actions.

Supplier Engagement Strategy and Review

- Supplier self-assessment questionnaire in Q4, 2022. Collate, analyse and report on SAQ.
- Advance supplier engagement and collaboration.
- Develop and implement supplier code of conduct.

Training

- Review training opportunities to integrate e-learning modules to bring awareness to a range of stakeholders.

Increased Monitoring and Reporting

- Establish processes and KPIs to monitor the effectiveness of the steps taken to address modern slavery risk.
- Increased reporting to the Board and subcommittees to review actions taken in response to modern slavery.

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 2021-2022. 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, in line with Board and community expectations



Dennis Richardson AC
Chair of StarFlight Australia
Chair of StarFlight Victoria



Modern Slavery Statement 2021-2022

