



# Modern Slavery Statement

2023 - 2024





## From the Chair

It is my pleasure to introduce the FY24 Modern Slavery Statement for LifeFlight.

The Statement outlines our approach to modern slavery, human trafficking, and other forms of forced labour. It also highlights the actions we have taken to fulfill our commitments.

Our focus is on identifying the risk; supplier engagement, thorough risk assessments; ongoing training; and actively listening to our stakeholders in order to foster continuous improvement.

As you read through this year's Statement you will see how LifeFlight has focused on increasing capability and developing systems to monitor, manage and respond when modern slavery risks are identified. Specifically with the engagement of a cloud-based ESG risk management and compliance solution.

The Statement also outlines the progress we have made against our program of work and the actions we have taken since FY23.

The measures outlined in this document, along with our review processes and organisational values, provide a guiding framework to reduce the risk of modern slavery in our practices and with our suppliers.

## 1. About LifeFlight

LifeFlight Australia Limited is a world leader in aeromedical care, with a core purpose to save lives and serve the community.

For close to 45 years, the company has operated a fully integrated fleet of LifeFlight rescue helicopters and air ambulance jets with its own dedicated team of emergency medical specialists, flight crews, clinical coordination specialists and engineering and maintenance crews. Together, LifeFlight provides the people of Queensland and beyond, with the assurance that emergency medical care is available 24/7, 365 days a year, no matter where they live.

In addition to integrated aeromedical services, LifeFlight performs international air ambulance repatriation services, inter-hospital transfers, dedicated aeromedical rescue services for industry partners, and aviation training. Through its joint venture operations, the company provides law enforcement and search and rescue aviation services.

LifeFlight is committed to treating its patients, workers, suppliers and joint venture partners with dignity and respect, ensuring safe working conditions and conducting environmentally responsible, ethical operations.

Our commitment reflects a dedication to the highest aeromedical and air transport safety standards in the world to achieve our mission and vision.

### Our Mission

To save lives and serve the community through the provision of rapid response critical care.

### Our Vision

To be the first choice charity and aeromedical evacuation organisation.



**We are committed to addressing and working to eliminate modern slavery. We continually refine our approach, sharing and applying lessons learned along the way.”**

**Jim Elder**, Chair, LifeFlight Australia

## 2. About this Statement

This Modern Slavery Statement is made by the reporting entity, LifeFlight Australia Limited (ABN 4501 031 6462), along with its wholly-owned subsidiaries (together the “Group” or “LifeFlight”), pursuant to the Australian Modern Slavery Act 2018 (Cth).

Each entity (except for LifeFlight Singapore) is incorporated in Australia and subject to Group-wide policies relevant to modern slavery risks.

- LifeFlight Retrieval Medicine Limited (ABN 83101511719).
- LifeFlight Commercial Limited (ABN 91627081930).
- LifeFlight Foundation Ltd (ABN 63618170184).
- Aeromed Qld Pty Ltd (ABN 32144010597)
- LifeFlight Singapore Pte. Ltd (Registration No. 201626689G)

LifeFlight’s overarching policies, systems and processes are applied across all entities.

By virtue of LifeFlight’s centralised management structure, the consultation process included all subsidiaries facilitated by a Modern Slavery Working Group who oversee preparation of the Statement and include key representatives to ensure a cross-functional view.

The Statement covers the financial year ending 30 June 2024. This Statement sets out the actions taken by LifeFlight during the period to establish systems and internal awareness to prevent, detect and respond to modern slavery within our own operations 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’ or ‘our’, it is a reference to LifeFlight.

The Statement was approved by the Board of LifeFlight Australia on behalf of all reporting entities in December 2024.

## 3. Our structure and our operations

LifeFlight and its wholly-owned subsidiaries are 100% Australian owned. We are committed to a culture of ethical and appropriate corporate behaviour in all business activities. This includes acting with integrity, honesty and in accordance with good governance principles.

LifeFlight employs some of the most experienced and qualified aeromedical professionals in the world including flight crews, emergency medical teams, engineering personnel, safety and systems specialists and program managers. We have an established track record in saving lives and adhering to all applicable civil aviation regulations and specialist medical accreditations.

Providing four air ambulance jets, 13 search and medical retrieval helicopters from 10 Australian bases, LifeFlight is one of the largest aeromedical operators in Australia. In addition, LifeFlight provides aeromedical and humanitarian services directly into the Asia Pacific region and, through proven international partners, around the globe. We deliver rapid-response critical care to patients in trauma situations such as motor vehicle accidents and patient retrievals from ships at sea, to neonatal and cardiac inter-hospital transfers, international medical evacuation and repatriations, and law enforcement search and rescue services. We have assisted close to 90,000 people since inception.

LifeFlight is one of only a few integrated aeromedical providers world-wide, meaning we directly recruit our own team of critical care doctors, nurses and paramedics, and our own flight crews, engineers, maintenance teams and aviation systems specialists to operate our own fleet of aircraft. To ensure a seamless, safe operation, these teams work and train together. LifeFlight has its own aviation training academy at Brisbane International Airport, and operates the LifeFlight Communications, Coordination and Control (“C3”) Centre - the operational heart of the organisation, managing rotary and fixed-wing operations and commercial deployments.



In the FY24, LifeFlight employed 180 critical care doctors, and helped 8,177 patients.

LifeFlight Commercial also provides training services to the Group of companies and other air operators through the LifeFlight Training Academy. It provides world class aviation engineering and maintenance services to all the LifeFlight entities and to its joint venture partners StarFlight Australia and StarFlight Victoria.

LifeFlight has a number of service agreements with significant commercial and public sector entities for the provision of aeromedical and search and rescue services, which are funded by government, public fundraising and commercial service provision. These include:

- Aeromedical and retrieval services for Queensland Health;
- Aeromedical services to a consortium of gas companies in Queensland's Surat Basin;
- Consultant level medical advice to Australian Maritime Safety Authority;
- Aircraft and engineering provision for Tasmania Department of Health aeromedical services (Rotor-Lift Aviation);
- Commercial repatriation services (governments and commercial companies);
- Dedicated jet air ambulance services into Asia Pacific;
- Aircraft and engineering provision for law enforcement and search and rescue services for the State Government of Victoria; and
- Provision of medical transport/search and rescue services for Defence exercises.

## Structure

Since humble beginnings in 1979, as the Sunshine Coast Rescue Helicopter Service, LifeFlight has grown to become one of Australia's largest aeromedical service providers. LifeFlight reports to a nine-member Board and is a registered charity with the Australian Charities and Not-for-Profits Commission ("ACNC").

LifeFlight has five wholly-owned subsidiaries, four of which are registered charities with ACNC.

**LifeFlight Retrieval Medicine Ltd** – provides the medical workforce (doctors, nurses and paramedics) into Queensland's aeromedical retrieval network through a contract with Queensland Health. It provides medical crews for both fixed wing and rotary wing aeromedical retrievals.

**LifeFlight Commercial Ltd** – is the entity through which LifeFlight undertakes commercial opportunities to raise funds, including air ambulance jet missions for national and international repatriation, aviation training and aeromedical services to other commercial and public sector organisations.

**LifeFlight Foundation Ltd** – is the charitable community fundraising arm of LifeFlight.

**Aeromed Qld Pty Ltd ("Aeromed")** – established for the leasing of air ambulance jets into the LifeFlight commercial business. Aeromed was granted charitable status by ACNC on 8 February 2024.

**LifeFlight Singapore Pte Ltd** – established to provide international jet air ambulance and emergency humanitarian services, including services for the United Nations. LifeFlight Singapore does not have charitable status.

LifeFlight Australia has commercial interests in two joint ventures:

**StarFlight Australia Pty Ltd** – established jointly with Fox Aircraft Services (part of the LinFox Group of Companies) to provide domestic aviation solutions for emergency services, defence and industry clients.

**MediFlite Ltd** – operated jointly with the Royal Flying Doctor Service ("RFDS") Queensland to provide additional aeromedical services into regional Queensland.

LifeFlight Commercial has a commercial interest in:

**StarFlight Victoria Pty Ltd** – established jointly with Fox Aircraft Services (part of the LinFox Group of Companies) to provide aircraft and engineering services to support law enforcement, and emergency search and rescue services to the Victorian Government.

The following diagram describes the relationship between LifeFlight and its subsidiaries, and affiliate companies.



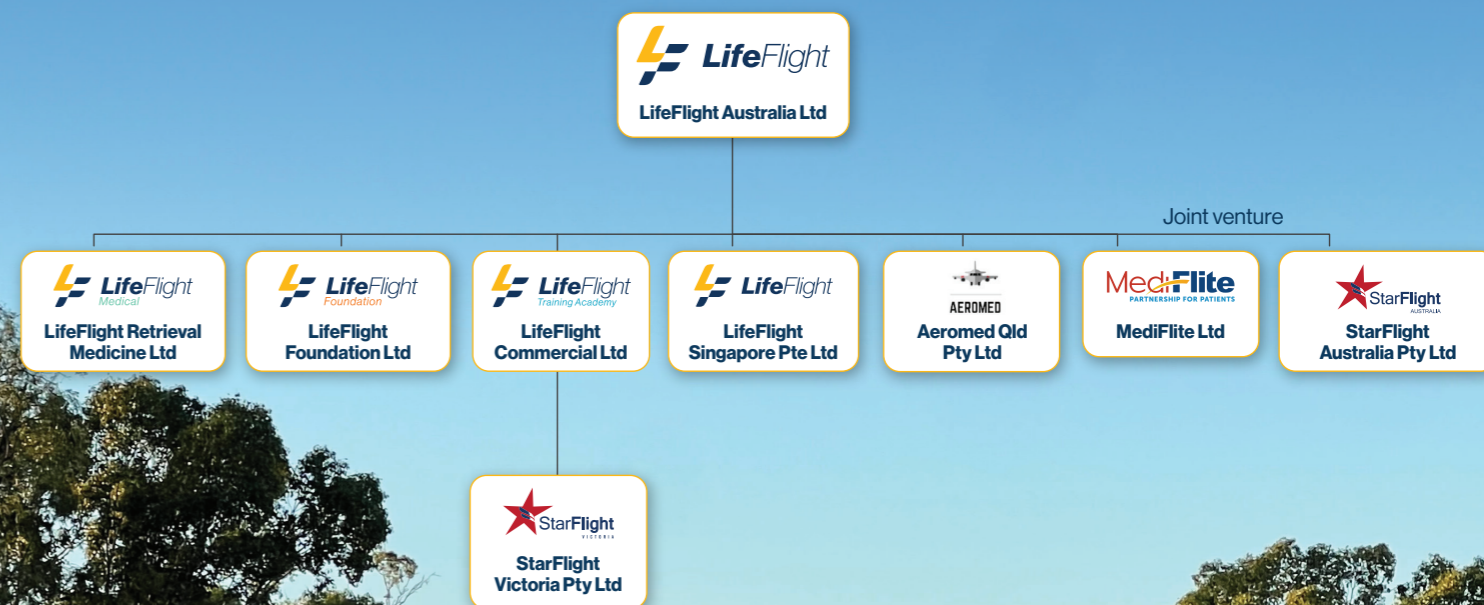
## Company structure

LifeFlight is the largest, most advanced aeromedical service in the southern hemisphere, providing rapid response and cutting-edge medical care to those who need it most.

A not-for-profit organisation, LifeFlight operates a commercial, "profit for purpose" model.

The company structure reflects LifeFlight's capability in aeromedical retrievals and training, engineering, mission co-ordination and commercial services contracts.

LifeFlight employs its own critical care doctors, flight nurses, flight paramedics, pilots, aircrew and engineers.





## Capabilities

Our capabilities include:


- medical repatriation and evacuation
- pre-hospital and inter-hospital critical medical care
- aeromedical tasking and coordination
- emergency medicine specialist personnel, training and hire
- aircraft mission systems
- law enforcement
- specialised training for the aeromedical and aviation industries
- telephone medical advisory services
- remote area medical and retrieval services to the resources industry
- search and rescue
- aircraft engineering and maintenance
- firefighting support
- safety and assurance


## Our Assets and Bases


LifeFlight has an extensive fleet of helicopters and fixed wing aircraft which operate from 10 bases throughout Australia – eight in Queensland, one in Victoria and one in Tasmania. LifeFlight’s emergency medical crews are deployed from those eight Queensland bases, and from three additional Queensland bases (Cairns, Mackay and Rockhampton) where they are contracted to third party aeromedical and emergency rescue providers. LifeFlight also operates a base in Singapore.

# Assets and bases

-  **09** ROTARY WING ASSETS
-  **04** FIXED WING ASSETS
-  **08** BASE FACILITIES
-  **11** LRM BASES

**SINGAPORE JET BASE** 

**TASMANIA**  Bell 412

**VIC POL**  3 x AW139

\*Subject to asset rotation





## 4. Our position on Modern Slavery

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

### Our Values

LifeFlight aims to model 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 Non-Negotiable Principles

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

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

We continue to work to understand and map the complex layers of our supply chain. At a high level, we have mapped the principal country of supply for the goods and services for all our supplier spend. This enables us to determine our potential supply chain risk based on source country and industry.

In addition, there are some specific cases where we seek to understand our tier two supplier risks.

### Our Governance

A Modern Slavery Working Group oversees the monitoring and review of modern slavery risks. Causes and controls are identified in the Enterprise Risk Register as part of the organisations broader risk management framework.

A review of the Enterprise Risk Register by the Audit & Risk Management Committee ("ARMC") is completed quarterly. 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.

Further, the LifeFlight Code of Conduct, company inductions and the Contracting and Procurement Policy help staff (and where appropriate, partners and customers) to proactively identify any part of the supply chain that may be vulnerable to Modern Slavery risk. These proactive steps bring awareness and recognition to LifeFlight to Modern Slavery practices.



Since taking to the skies 45 years ago, LifeFlight has helped almost 90,000 people,"

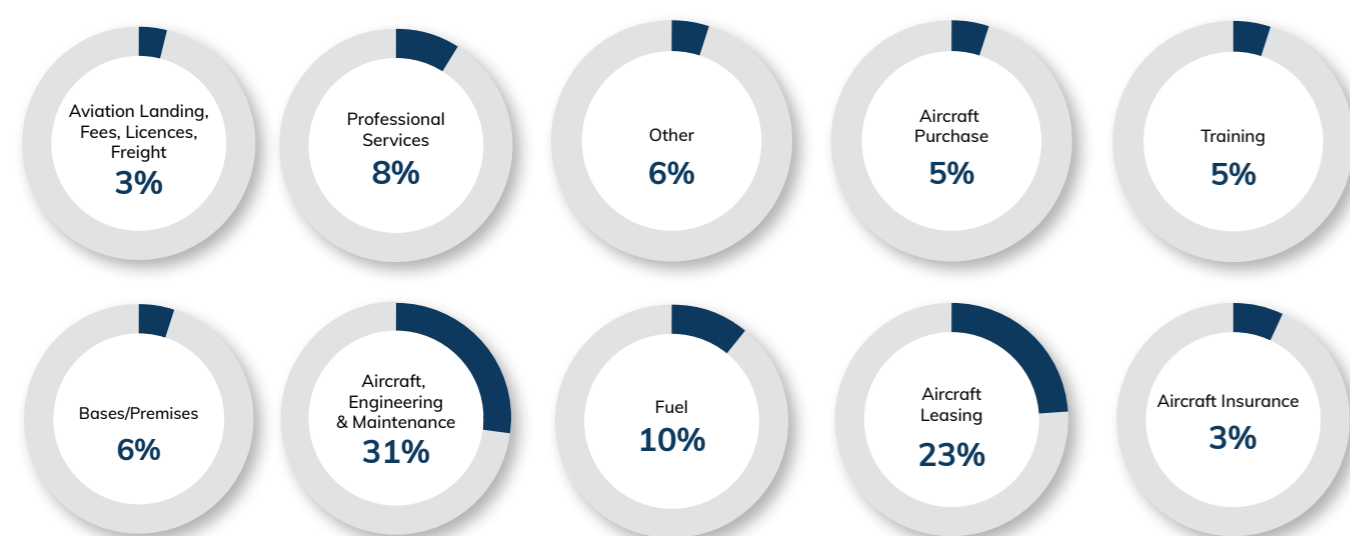
Ashley van de Velde OAM, LifeFlight CEO



## 5. Understanding our supply chain

Our value chain consists of suppliers who provide services directly to LifeFlight such as the leasing of specialist fixed and rotary wing aircraft, aircraft mission systems, medical and surveillance technologies, engineering and maintenance support, training and aviation-related construction (hangars and accommodation).

Our FY24 spend profile by supply category is shown in the following diagram. The three largest areas of supplier spend relate to aircraft engineering and maintenance, aircraft and leasing.



Aircraft Engineering and Maintenance, and Aircraft Leasing account for just over half of LifeFlight's supply chain expenditure sourced primarily through Australian, American, Canadian, Singaporean and Italian companies.

Aviation Landing fees is the most diversified category of spending reflecting the large number of European, EMEA and APAC countries which LifeFlight transport.

### Top Suppliers by Spend

Our supply chains are divided into different tiers, with Tier 1 suppliers contracted directly to provide goods and services. Tier 1 suppliers may subcontract to Tier 2 suppliers.

In FY24, LifeFlight's top suppliers, with regards to spend, were as follows:

**Pratt & Whitney** – a Canada-based aircraft engine manufacturer that provides aircraft engine maintenance for LifeFlight. Pratt & Whitney's parent company RTX Corporation has a published Modern Slavery Statement under Delaware, USA legislation: [www.rtx.com.au](http://www.rtx.com.au)

**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 Italy. The company supplies aircraft engineering parts direct to LifeFlight and is the manufacturer of a number of helicopters in LifeFlight's fleet. Leonardo has a published Modern Slavery Statement commensurate with European laws: [www.leonardo.com/en/](http://www.leonardo.com/en/)

**IOR Aviation** – one of Australia's largest energy and infrastructure providers. IOR supplies fuel and fuel management technology to LifeFlight. IOR has a published Modern Slavery Statement under the Modern Slavery Act 2018 (Cth): [www.ior.com.au](http://www.ior.com.au)

**A&A Helicharter Pty Ltd** – is a private Australian aviation company providing helicopter charters, as well as a team of experienced helicopter engineers providing a turn-key mobile helicopter maintenance service.

**AerCap Holdings N.V.** – the world's largest owners of commercial aircraft and leader in aviation leasing. LifeFlight 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).





During 2023-24, we were committed to identifying, assessing, and taking action to mitigate potential modern slavery risks in our operations and supply chain.

With increased visibility resulting from a cloud-based ESG risk management and compliance solution, LifeFlight assessed The potential supplier risk across the top sourcing countries by spend and largest spend categories.

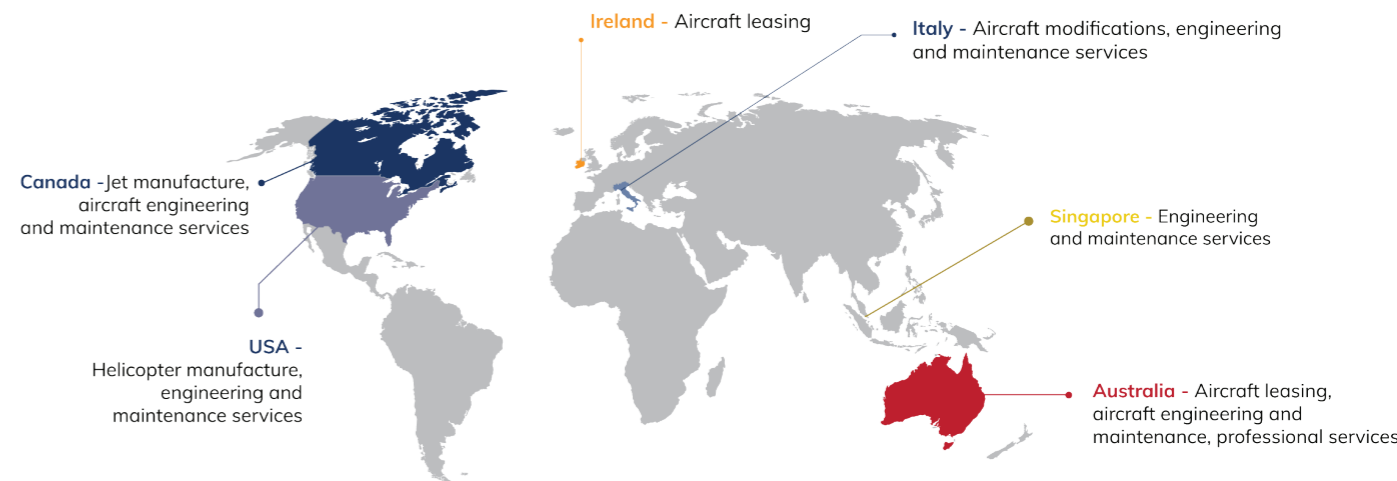
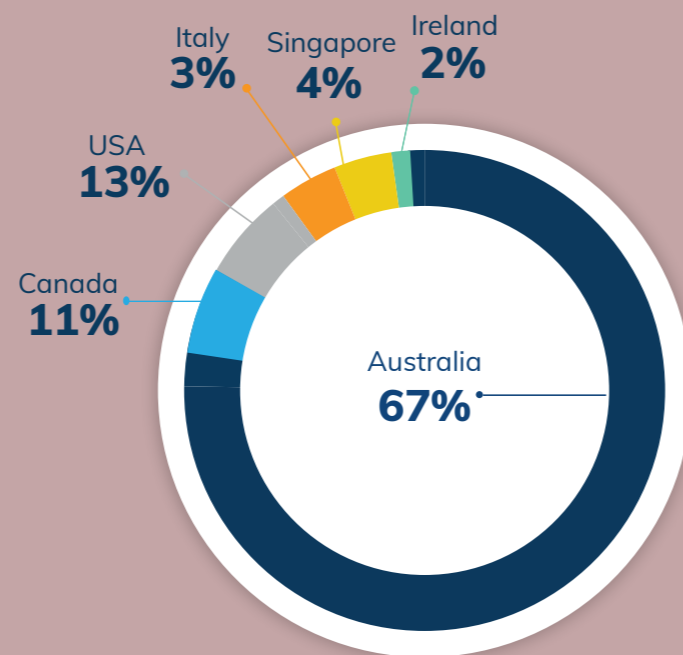
### Geographic location of services and suppliers

Over 65% of LifeFlight's spend is within Australia and almost 100% of its staff are domiciled here.

The largest service, by percentage spend, is for aircraft engineering and maintenance services. The maintenance of aircraft, and aircraft engines, is a highly regulated industry. In the instance of engine maintenance, LifeFlight sources its maintenance services directly from the aircraft manufacturer at its global operational site, or in Australia where the manufacturer has a subsidiary.

LifeFlight's second largest supplier by country of origin, is the USA followed by Canada. AerCap are the largest USA supplier. Pratt & Whitney and Bombardier, both in Canada, have also been identified as key suppliers.

LifeFlight also sources supplies, parts and services directly from Leonardo, the global helicopter manufacturer based in Italy, and a Tier 1 supplier to LifeFlight. Ireland and Singapore are also large suppliers, by country of origin, supplying aircraft leasing through LCI Helicopters (Ireland) and World Fuel Services (Singapore). The category 'Other', at 6%, largely consists of aircraft landing fees payable to airports in New Zealand, Indonesia, Malaysia, Fiji, China and the UAE.



### Industry sector and product or service

As a leading aviation and emergency services provider, LifeFlight operates under medical aviation and quality and governance accreditation, including International Standard ISO 9001: 2015. LifeFlight 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 aeromedical services are released or services are delivered and is a continuous process to ensure quality improvement as well as compliance.

LifeFlight 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 LifeFlight from modern slavery practices.

### Assessing our Risk Profile

LifeFlight has utilised external subject matter experts to assess potentially elevated risks in our supply chains. The foundation of the process is utilising the proprietary approach of long-term external consultants with subject matter expertise in modern slavery risk identification and assessment.

This process integrates a balanced, global Multi-Regional Input-Output (MRIO) table to perform supply chain mapping, which links supply chain data from 208 countries, and 37,318 unique industry/country combinations.

The consultant's data universe comprises over 35,000 local industries categories, which represents more than 98% of global GDP. The MRIO is regularly updated and draws from the most comprehensive and credible global data inputs available, including the United Nations' (UN) System of National

Accounts; UN COMTRADE databases; Eurostat databases; the Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and official statistical data from many national agencies worldwide, including the Australian Bureau of Statistics.

The global economic supply chain data is overlaid, via a proprietary algorithm, with the best available research on modern slavery prevalence, including the Walk Free Foundation's Global Slavery Index (last updated in May 2023), the International Labour Organisation's Global Estimates of Modern Slavery, and official reports published by the United States on International Child Labour, Forced Labour and Human Trafficking.

Outlined in the Risk Profile were specific areas, practices and companies within LifeFlight's supply chain that carry heightened risk of modern slavery. In total close to 1,000 companies were assessed.

### Moderate to High Risk Suppliers

The risk assessment has flagged 8 suppliers as having potentially elevated supply chain risk factors. These suppliers are all operating in potentially higher risk locations such as India, Papua New Guinea, Kiribati and the Solomon Islands. LifeFlight is cognisant of the inherent risks in these locations. However, our procurement spend with these entities is either with local airport authorities or is spend on mandatory aviation landing fees, required for us to land our transportation aircraft. These suppliers provide a critical gateway for LifeFlight to evacuate and transport patients based in these higher risks locations, and are considered integral to providing aeromedical and humanitarian services to lower socioeconomic locations.

### Risk by Sector

Using our procurement data from FY24, the third party risk assessment tool has determined that the following industries have a higher potential exposure to modern slavery supply chain risks:







## 7. Initiatives implemented in 2023-2024

This year LifeFlight focused on delivering a program of work to continuously improve and manage our modern slavery risk, and turned our sights and preventative actions to impact measurement and stronger commitment to remediation.

### Governance

- LifeFlight's Board is responsible for overseeing the effectiveness of LifeFlight's risk management systems and internal control and approving the annual modern slavery statement. The Board's ARMC assist with that oversight by reviewing and considering modern slavery risk and receiving updates from the Modern Slavery Working Group. The Modern Slavery Working Group comprises of representatives from the Risk and Assurance, Commercial, Finance and People & Culture teams.
- The Modern Slavery Working Group, convened by the Chief Financial Officer, met bi-annually to track actions against a Modern Slavery program of works.
- A bi-annual review of the measurement and evaluation framework and key findings was shared with LifeFlight management, LifeFlight ARMC and the Board.

### Supplier Engagement Strategy and Review

- LifeFlight continued to implement the supplier engagement strategy. Where reasonable and practicable, LifeFlight communicated new and

existing suppliers to ensure awareness of LifeFlight's expectations of its own representatives, and its expectations of those it does business with, in terms of combating modern slavery.

- LifeFlight enlisted a global ESG data provider and consultancy, to provide visibility of the company's ESG risk along the entire supply chain. Risks identified in specific areas, practices and companies with the Group's supply chain that carry heightened risk of modern slavery, were elevated and explored. Particular focus paid to more vulnerable populations and the cumulative forced labour footprint.

### Collaboration and Consultation

- LifeFlight 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.
- The Group 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 company inductions and annual training.

- Crude petroleum and services related to extraction
- Textiles

A short summary of the risks associated with these sectors is set out below.

### Crude petroleum and services related to crude oil extraction:

This sector is defined as suppliers related to the extraction and drilling of petroleum and crude oil. LifeFlight is not itself directly procuring from suppliers in this sector, however this category has been identified by the third-party risk assessment because of our material spend on Australian based suppliers of Aviation Gasoline, who are likely to be sourcing inputs from the crude petroleum sector. This also aligns with the risk assessment data indicating that our supply chain risk exposure is concentrated at Tier 2 and beyond.

The risks associated with the crude petroleum sector are the sector-wide use of offshore extractive and refinery sites, which are often located in high-risk regions such as the Middle East or Southeast Asia. These industries are also reliant on foreign migrant workers, who are often contracted in temporary positions and are working onsite at remote locations with low visibility over working conditions.

### Textiles

Like many organisations, LifeFlight is sources product from a range of suppliers related to the textile industry, including

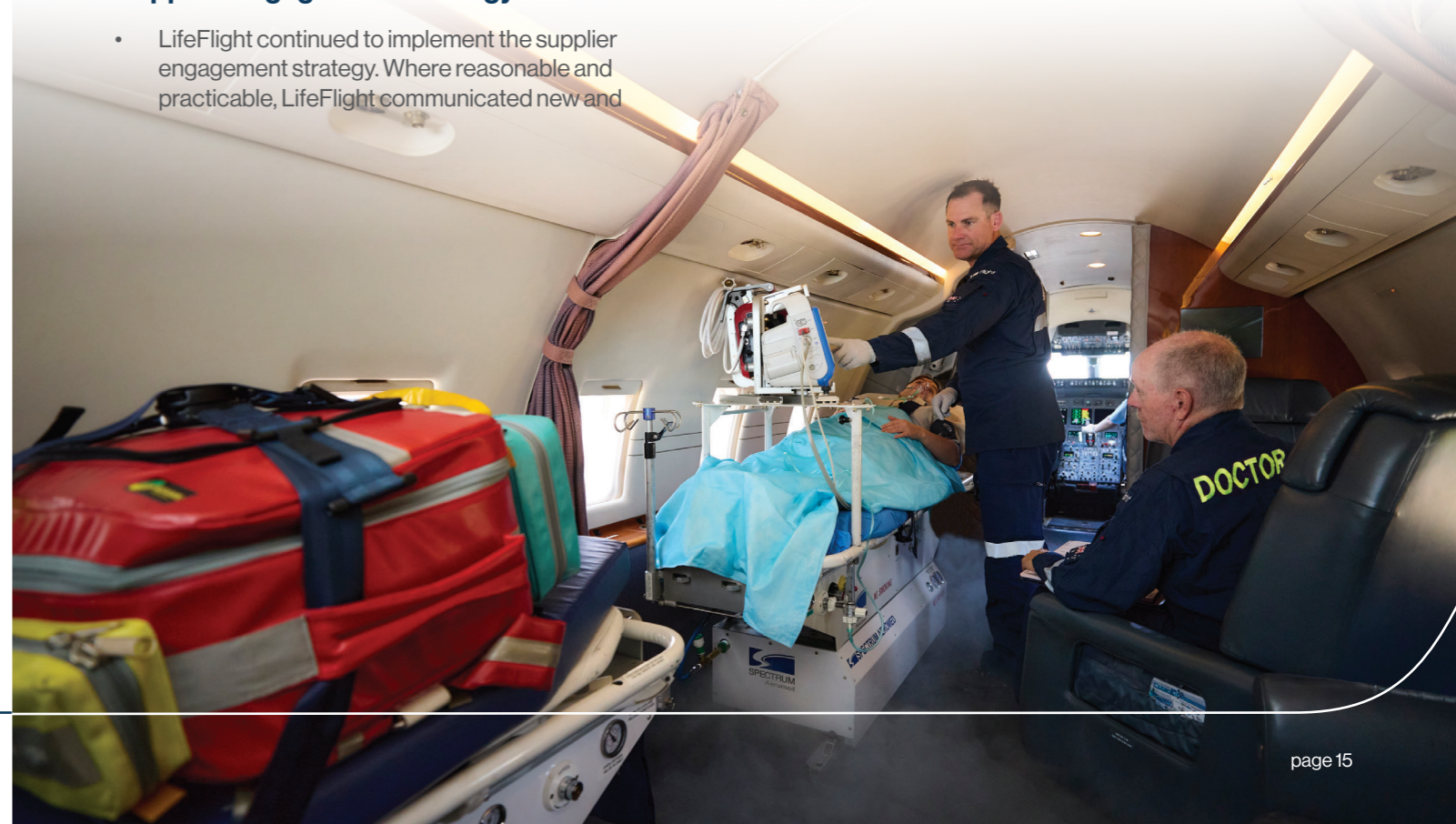
uniform suppliers, corporate merchandise suppliers, and upholstery suppliers. We recognise that this sector is widely regarded as higher risk, with the 2023 Global Slavery Index's Spotlight on risks in the garment sector observing, "There are risks of modern slavery at each stage of the garment supply chain, from growing and producing raw materials, to processing these into inputs, to manufacturing".[1] We also acknowledge that factors such as the use of factories in high-risk countries such as China and India, prevalence of migrant workers, the inherently low skilled nature of the sector and low cost-per unit product lines all contribute to sector wide risks.

Between reporting periods there was an increase in foreign procurement spend that increased LifeFlight's exposure to modern slavery (FY23 – Australia spend = 78%, FY24 – 67%). This was a result of increased aircraft maintenance expenditure with Pratt & Whitney and Bombardier, both of which are Canadian companies.

The category that poses the highest potential risk is crude petroleum and services.

LifeFlight's utilisation of select petroleum suppliers and auxiliary transport services (for medical repatriation services) pose a moderate to high risk. In FY25 LifeFlight will work with repeat suppliers and request a company self-assessment to identify gaps in process.

**Overall, the estimated number of people in forced labour in LifeFlight's supply chain per \$M spent was 0.0212 and the estimated number of people in forced labour in the supply chain 4.78 relative to all the spend data.**





## 8. Enhancing our proactive measures

The measures outlined in this document, along with our review processes and organisational values, provides a framework to reduce the risk of modern slavery in our practices and with our suppliers.

We aim for continuous improvement and are committed to maintaining effective systems and programs to identify and proactively manage modern slavery risks in accordance with regulatory obligations.

A key part of the program is monitoring data as indicators of effectiveness, and the power of supply chain transparency to transform how the business addresses ESG risks.

In FY25, Modern Slavery will be overseen by LifeFlight's new Environmental & Community Sustainability (ECS) Steering Committee, charged with implementing a framework, and fit-for-purpose policies, which support integration of ECS practices and ensure compliance with relevant regulations, codes of practice and community standards.

LifeFlight will continue to challenge effectiveness and ensure metrics are relevant with a focus on high-risk areas for maximum impact. The ECS focus will be developing a Measuring Effectiveness Framework for Modern Slavery across the key pillars of Governance and Policy, Risk Assessment, Due Diligence, Measuring Effectiveness and Remediation, Internal Training and Education, and External Engagement.

## 9. Authorisation

LifeFlight is committed to ensuring our organisation and supply chain operate with integrity and without exploitative practices. The Board of LifeFlight has authorised and approved the publication of the Modern Slavery Statement 2023-2024.

LifeFlight is pleased to publish this Statement. This document provides a 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.




**Hon. Jim Elder**  
Chair (Non-executive)  
LifeFlight Australia







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