



Modern Slavery Statement

Financial year 2023/24

CareFlight

Supplier Code of Conduct

CareFlight's vision is to be the most advanced integrated aeromedical service trusted by all Australians. In keeping with this vision, we recognise the importance of managing our supply chain to ensure that the goods and services we purchase are provided to us in a manner that respects fundamental human rights, is consistent with our Code of Conduct and Ethics, and recognises our responsibility to manage the environmental impact of our operations.

The Supplier Code of Conduct (**Code**) applies to all suppliers of goods or services to CareFlight. We expect that our suppliers, whether directly or through their supply chain, conduct themselves according to the principles and standards in this Code and implement suitable management systems and processes. We also expect that our suppliers provide influence and guidance within their own supply chain to adopt the principles and standards in this Code.

Compliance with Laws

Suppliers are required to comply with all applicable national and local laws and regulations, including but not limited to those relating to labour, health and safety, and the environment.

Ethics and Business Conduct

CareFlight expects suppliers and their agents to behave ethically and with integrity in all business transactions.

- All forms of corruption, extortion or embezzlement are strictly prohibited.
- Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.
- Suppliers should not offer or receive gifts that could affect, or be perceived to affect, the outcome of business transactions or are not otherwise reasonable and justified.
- Financial records must be kept in accordance with all applicable accounting practices, legal and regulatory requirements.
- Suppliers will conduct their business in line with fair competition and in accordance with all applicable competition laws.

- Suppliers will not publicly disclose their supply association with CareFlight or use the CareFlight name or brand elements without CareFlight's prior written consent.
- CareFlight's intellectual property rights are to be respected.

Human Rights and Labour Standards

Human Rights

CareFlight respects fundamental human rights. As set out in the Universal Declaration of Human Rights (UDHR), suppliers are expected to recognise and be committed to upholding the human rights of workers.

Forced Labour and Inhumane Treatment

- Suppliers will not use any forced, bonded or indentured labour or involuntary prison labour.
- Suppliers will not engage in, or condone, inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion of workers.
- Suppliers will ensure their activities do not contribute toward human exploitation, including human trafficking.

Child Labour

Suppliers must not engage in practices relating to, or subcontract with organisations, who employ child labour.

Wages, Benefits and Conditions

- Suppliers will compensate workers in compliance with all applicable local wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Working hours are not to exceed the legally accepted maximum set by local laws.
- Suppliers are responsible for maintaining the workplace and any living quarters used to house workers in a hygienic and safe manner.

Signed:



Mick Frewen - CEO CareFlight

1. INTRODUCTION

This is the fourth Modern Slavery Statement of CareFlight Limited (ABN 18 210 132 023) pursuant to the Modern Slavery Act 2018 (Cth) (“Act”). CareFlight is a reporting entity under the Act and this Statement sets out the steps we have taken during our financial reporting period from 1 May 2023 to 30 April 2024 to identify and assess the risk of Modern Slavery (as defined in the Act) in our operations and supply chains, and the processes we have in place to assess and address those risks.

CareFlight is fully committed to acting ethically and operating responsibly. This commitment extends to enhancing our practices and processes to better identify and minimise the risk of Modern Slavery in our operations and supply chains and to ensure we are engaging with suppliers that share that commitment.

The reporting framework under the Act presents CareFlight with an opportunity to gain continuing deeper understanding of the supply chains that underpin the delivery of our programs and other operations. This has enabled us to continue our commitment to develop better frameworks and processes to minimise the risks of Modern Slavery in our operations and supply chain and to ensure our suppliers adhere to CareFlight’s Supplier Code of Conduct (opposite).

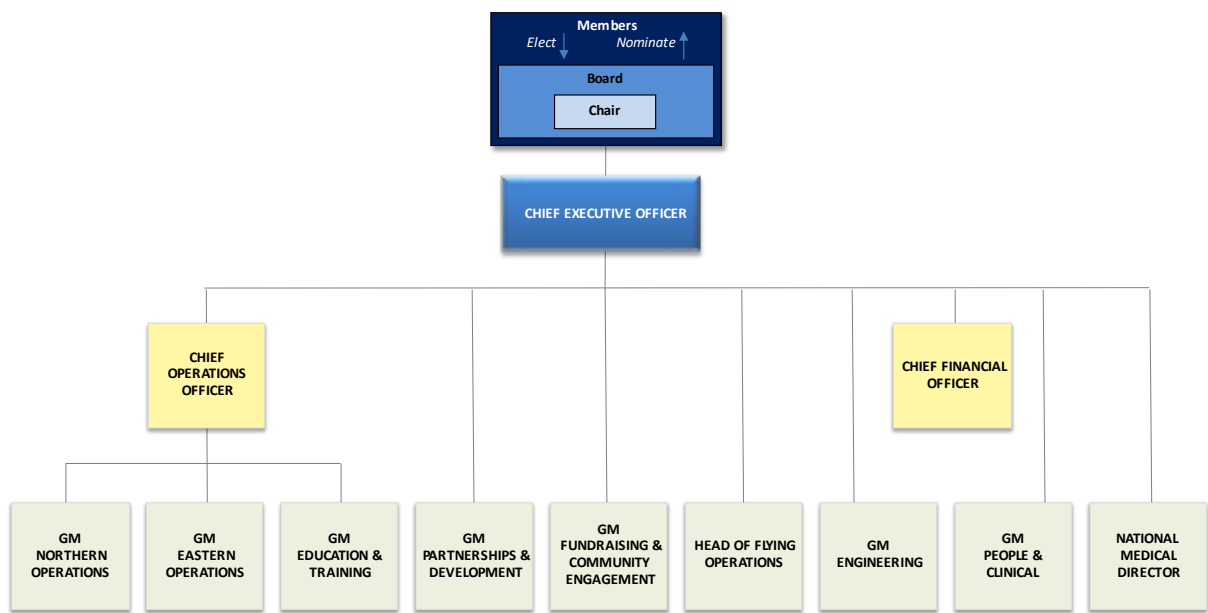
2. STRUCTURE, OPERATIONS & SUPPLY CHAIN

CareFlight primarily provides aeromedical retrieval services and support services, including maintenance, fundraising, education and training.

We are working closely and non-stop with our partners across the healthcare system as we continue to deliver our mission to save lives, speed recovery and serve the community.

Structure

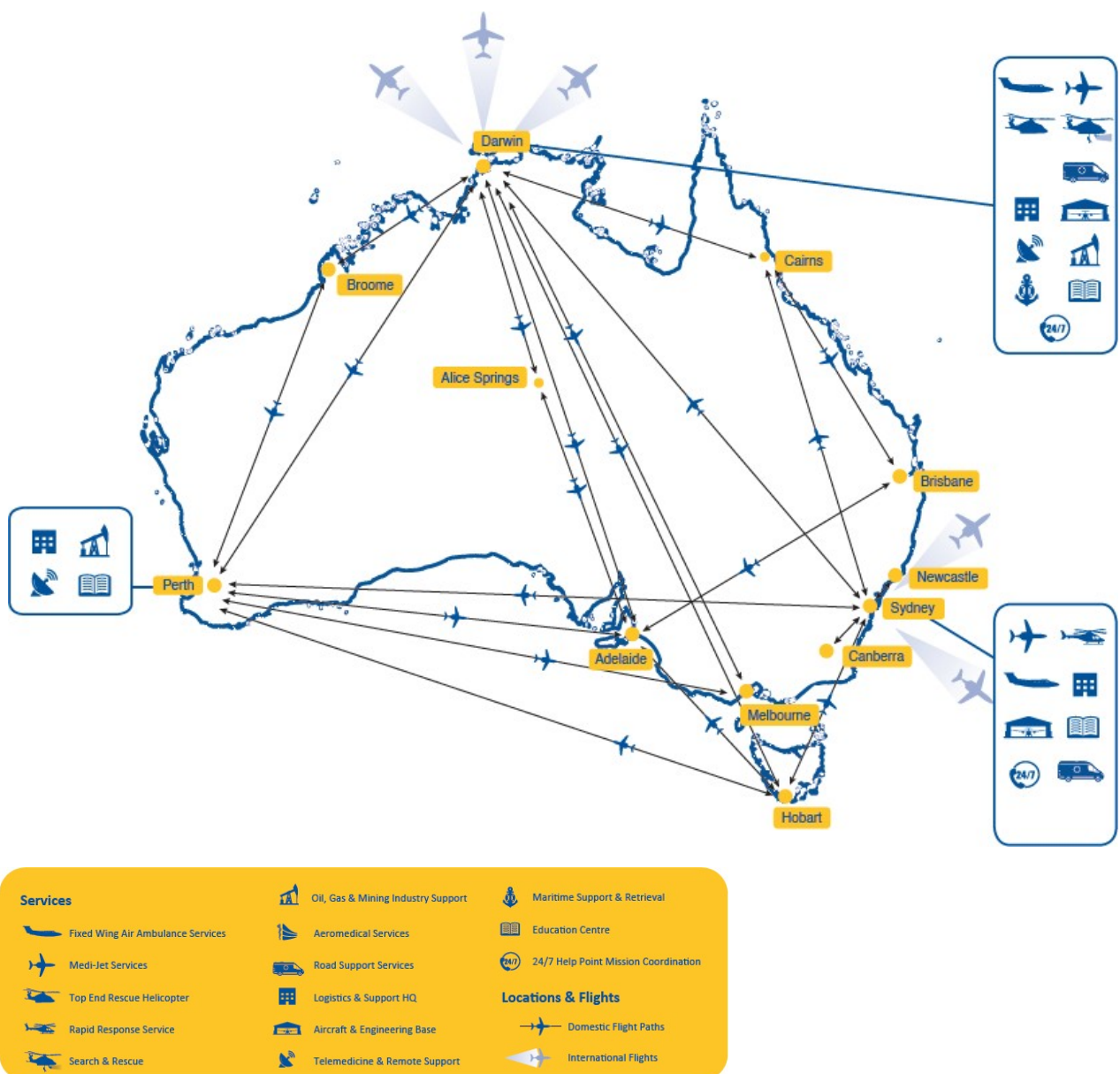
CAREFLIGHT STRUCTURE



Operations

CareFlight key activities across Australia include:

- **Aeromedical Retrieval** – interhospital transfers, accident to hospital, home to healthcare facility
- **Repatriation Flights** – international retrievals
- **Patient Vehicle Transfers** – to support the above aeromedical operations
- **Search and Rescue** – including our Fire, Flood & Rescue (FFR) operations
- **Engineering** – CASA CAR30 aircraft maintenance & servicing integrating into One CareFlight
- **Clinical Training** – Colleges accredited and corporate training of industry -specific courses
- **Aviation Training** – CASA Part 119 Training & Checking and Part 141/142 organisation
- **MediSim Training** – simulation workshops to First Responders, including remote communities
- **First Aid Training** – provision of accredited First Aid and CPR Training
- **Fundraising** – to provide funds towards our operations and social purpose
- **Marketing** – and Communications to promote CareFlight brand



Suppliers

CareFlight sources goods and services from a vast range of suppliers, predominantly within Australia.

Our major categories of procurement include:

Aviation

- Aircraft
- Aircraft components
- Maintenance tools
- Maintenance consumables
- Fuel
- Simulator training

Clinical

- Medical equipment & devices
- Clinical consumables
- PPE
- Pharmacy
- Clinical training services

Fundraising & Marketing

- Appeals
- Regular Giving
- Grants
- Advertising – print, digital
- Communications – media, design, printing
- Promotional merchandise and apparel – stock, bears, t-shirts

Support Services

- Staffing
- Uniforms
- IT and technology
- Utilities
- Contractors
- Patient Road vehicles

3. RISKS OF MODERN SLAVERY PRACTICES

With CareFlight's operations primarily in Australia, we consider the risk of direct involvement in modern slavery practices to be low.

CareFlight's currency transactions to its 105 foreign suppliers were reviewed over the last year to identify potential high-risk suppliers based on geography. Foreign transactions in the reporting year were undertaken in currencies of AUD, NZD, USD, Euro and GBP with 102 foreign suppliers either within Australia, the USA, Germany, Italy, Ireland, Finland and the UK. None deposited to countries of high-risk, nor denominated in currencies of countries considered high-risk.

There were 3 foreign suppliers used by CareFlight in countries that could be considered vulnerable to modern slavery (Japan, Philippines, United Arab Emirates) where CareFlight paid JPY & USD dollars for goods and services. One supplier provides aircraft manuals, one provides aviation simulator training and one was for payment of landing charges in that country.

Whilst all our direct suppliers appear low risk there may be suppliers/importers used by CareFlight whose upstream vendor operations are in high-risk countries. These have been identified, based on industry and

geographic risk assessment, and include:

- Aircraft components/parts
- Clinical devices / consumables
- IT hardware
- Promotional merchandise and apparel
- Uniforms / Garments
- Cleaning Services
- Visa enabled labour hire

It was also identified that there is additional risk with suppliers who have limited commercial experience and/or only basic English language capability. Knowledge of modern slavery legislation may be beyond their practical understanding, and therefore they may fail to identify risk and drive change in their operations or supply chain.

Reviews of suppliers considered to fall within the above areas were undertaken to identify potential indirect modern slavery risks in the upstream vendor operations of our suppliers.

Aircraft components / parts

CareFlight contracts with a number of suppliers to support its aviation operations. The bulk of the acquisitions are from Australian companies that have regulatory approval to supply aviation parts, many of whom already report their own Modern Slavery Statements. Some spare parts, components and consumables are sourced from overseas aviation manufacturers and suppliers via a global supply chain network. These suppliers are reputable companies subject to very high safety and compliance standards from Original Equipment Manufacturer (OEM) in USA or European countries that have a low prevalence of modern slavery and governments that take strong action to eliminate it. Nevertheless, there are risks that the manufacture or supply of some of the aviation parts and components may contribute to modern slavery practices. Although CareFlight is not aware of such practices, it will continue to act in accordance with legal requirements and continue its annual due diligence audits on these critical suppliers to identify risks of modern slavery in upstream vendors in the aviation supply chain.

Clinical equipment / consumables

All of our suppliers of clinical equipment / consumables are Australian legal entities based in Australia. Clinical equipment / consumables used by CareFlight have prior approval by the Therapeutics Goods Administration (TGA) and Australian Register of Therapeutic Goods (ARTG) registration, regardless of where they are sourced. The risk of modern slavery is in the supply chains upstream of our direct suppliers.

Our direct suppliers, although located in Australia, are highly likely to import products from overseas, including from countries where modern slavery may be more prevalent. CareFlight outsources procurement of the bulk of its clinical equipment/consumables to two large supplier corporations: one for our Northern Operations and one for our Eastern Operations. Both these corporations are required to produce a Modern Slavery Statement, both of which identify supply by offshore vendors in certain countries as a risk and provide ongoing assurance as to how the risk is being managed. If we are unable to procure items from these two CareFlight preferred suppliers we utilise other clinical suppliers, common to many healthcare organisations which would also place them under significant scrutiny as the healthcare industry strives to reduce the risks around modern slavery.

IT hardware

The electronics industry is recognised globally as a high-risk industry. Manufacturing often occurs in locations with minimal regulation and oversight, where workers have limited resources and methods for

resolving grievances. There is also a risk that products are manufactured from raw materials where workers have been subjected to modern slavery and that accordingly we could contribute, or be directly linked to, modern slavery practices through the purchase of electronic devices, including computers and mobile phones. CareFlight has engaged a global IT hardware supplier and has reviewed the supplier's approach to addressing risks of modern slavery in its own supply chain. The supplier was found to be well-advanced in this area. The supplier has a clear and well-publicized zero-tolerance approach to modern slavery in its supply chain and maintains global Modern Slavery Statements in compliance with the Australian Modern Slavery Act 2018, the U.K. Modern Slavery Act 2015, and the California Transparency in Supply Chains Act 2010.

Promotional merchandise and apparel

CareFlight has outsourced the procurement of promotional merchandise to a large Australian supplier that does engage with manufacturers/suppliers from high-risk countries (including China, India, Bangladesh, Vietnam, Thailand, Indonesia, Laos, and Brazil). The Australian supplier has lodged its own Modern Slavery Statement and has clearly identified its risk in these high-risk countries. It adopts a continuous improvement model, backed up by independent auditing of its suppliers, to ensure that the operations of the factories from which it sources the products are safe, fair, sustainable, and importantly free of modern slavery.

Uniforms / Garments

Garments, particularly branded clothing and Protective Personal Equipment (PPE) are often produced in countries with higher risks of modern slavery, where government oversight and due diligence processes are less stringent than those in Australia. Without adequate contractual arrangements and due diligence there is a risk that we could be contributing to, or be directly linked to, modern slavery practices through our arrangements with third party suppliers of PPE and uniforms for our employees. There is also a risk that products are manufactured from raw materials such as cotton, where workers may have been subjected to modern slavery. CareFlight engages three garment suppliers: one for business wear and two for workforce uniforms/apparel. The business wear supplier has its own Modern Slavery Statement registered with the Australian Government and one of the workforce uniforms suppliers is Supply Nation Certified and a member of the First Australians Chamber of Commerce and Industry, the other is also Australian based – all suppliers are considered low-risk by CareFlight.

Cleaning Services

CareFlight engages its cleaning staff via small local cleaning services. Terms and conditions are set out in formal agreements. Although CareFlight has identified this to be an area of modern slavery risk, there is no evidence to indicate any local issues. However, as part of its forthcoming modern slavery program of work, CareFlight will undertake a deeper assessment of the local suppliers due to the inherent risk in the wider cleaning industry and may implement changes to further reduce risk in this area such as participation in the Cleaning Accountability Framework.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS OF MODERN SLAVERY PRACTICES

CareFlight's approach to manage modern slavery risk includes the following measures -

1. A published CareFlight Supplier Code of Conduct on our website.
2. An Employee Code of Conduct, which mandates employee compliance with all laws, rules, regulations and policies, with consequences for any breaches.
3. A Whistleblower policy, complete with internal Whistleblower Protection Officer, a Toll-Free Ethics Hotline, and a response program.
4. Compulsory registered online training module for the Employee Code of Conduct. This registers all employees who have completed the training module upon employment commencement, and also upon re-training following Employee Code of Conduct updates.
5. Equal opportunity, discrimination, and harassment policies.
6. Defined feedback, compliments, complaints and grievance policies.

5. EFFECTIVENESS OF ACTIONS AND LOOKING FORWARD

CareFlight is continuing to improve our assessment and mitigation activities by -

- Reviewing and consolidating our list of current suppliers, removing those who are no longer or are rarely used. This is being achieved through the implementation a new finance system.
- Revising the way in which we review and assure the integrity of our suppliers. This process considers all CareFlight suppliers and is based on the introduction of risk-based criteria to determine the significance to CareFlight of each supplier, the nature of the services/products they supply and where they are geographically located.
- Incorporating a modern slavery assessment into our supplier assurance process for at risk suppliers, and based on the responses and our ability to use alternate suppliers, determine whether it is viable to cease commercial relationships with suppliers that do not provided sufficient assurance.
- Reviewing annually our modern slavery processes to make sure that CareFlight maintains its commitment to acting ethically and operating responsibly.

6. CONSULTATION AND APPROVAL PROCESSES

CareFlight has prepared this Statement with commitment from senior management with delegated accountability for the following functions:

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

This statement was approved by the members of the Board of CareFlight in their capacity as the principal governing body of CareFlight on 31 October 2024.



Brad Hazzard
Chair of the Board for CareFlight