

## **MODERN SLAVERY STATEMENT**

*Alliance Aviation Services Limited has produced this Modern Slavery Statement in accordance with Section 16 of the Modern Slavery Act 2018 (Cth) (“the Act”) for the financial year ended 30 June 2024.*

*All references to our, we, us, the Company, the Group, and Alliance collectively refer to Alliance Aviation Services Limited its reporting entities and subsidiaries including Alliance Airlines Pty Limited, Alliance Leasing No. 1 Pty Limited, Alliance Leasing No. 2 Pty Limited, Alliance Leasing No. 3 Pty Limited, Jet Engine Leasing Pty Ltd, Bravo Airlines Pty Limited, Unity Aviation Maintenance Pty Ltd, and Rockhampton Aviation Maintenance Pty Limited.*

## **INTRODUCTION**

Alliance Airlines Pty Limited was founded in 2004 and listed as Alliance Aviation Services Limited (“AZQ”) on the Australian Stock Exchange in 2011. Alliance operates in four segments of the aviation market: closed charter, ACMI, aircraft leasing, and part sales. All segments leverage Alliance’s investments in physical assets that include aircraft, engines, and spare parts.

## **A MESSAGE FROM OUR MANAGING DIRECTOR**

Alliance is pleased to present its sixth Modern Slavery statement, which builds upon the previous year’s statement.

Alliance’s core values represent who we are, what we do and how we go about our business. Accountability at the Board level all the way down through the company ensures that we accept our responsibilities towards health and safety in accordance with state and territory legislation. Alliance has a robust corporate governance framework that is underpinned by the integrity of the business.

As Alliance continues to grow and expand our business network, so too does the size and complexity of the group’s supply chain. However, the company remains vigilant about its Modern Slavery commitments, that I personally take very seriously.

Protecting human rights of the people we employ and engage with remains a key focus of the Board and Management Team.

A handwritten signature in blue ink, appearing to read "Scott McMillan".

**Scott McMillan**

*Managing Director*

*26<sup>th</sup> November 2024*

## STRUCTURE AND REPORTING ENTITIES

The controlled entities of Alliance Aviation Services Limited (ASX: AQZ) are:

Name	Country of incorporation
Alliance Airlines Pty Limited	Australia
Alliance Leasing No. 1 Pty Limited	Australia
Alliance Leasing No. 2 Pty Limited	Australia
Alliance Leasing No. 3 Pty Limited	Australia
Jet Engine Leasing Pty Ltd	Australia
Bravo Airlines Pty Limited	Australia
Unity Aviation Maintenance Pty Ltd	Australia
Rockhampton Aviation Maintenance Pty Limited	Australia

## OUR GOVERNANCE FRAMEWORK

At Alliance our corporate governance is underpinned by transparency, rigor, and accountability. Alliance is committed to working with our clients and partners to ensure that our operations are socially responsible and ethical. The Group’s Corporate Governance Statement can be found on the Alliance Airlines website.

Stakeholders	Government & Regulators	Clients & Investment Partners	Shareholders	Employees	Community
<b>Board</b>	The Board of Directors maintain oversight of the company’s human rights obligations.				
<b>Management Responsibility</b>	<b>Audit and Compliance Committee</b> Responsible for oversight of the Company’s response to human rights obligations and provides guidance to the Board.		<b>Executive Leadership Team</b> Accountable for the implementation of the group’s human rights obligations.		
<b>Business Processes</b>	<b>Human Resources</b> Ensuring employees are subject to relevant awards or industrial instruments		<b>Procurement Team</b> Ensuring the identification and response to the modern slavery risks within the group’s supply chain.		
	<b>Line Management Team</b> Ensuring identification and response to modern slavery risks within their departments.		<b>Operational Staff</b> Responsible for the identification of modern slavery risks within the group’s operations and supply chains, consistent with the company’s values.		
	<b>Commercial Teams</b> Each contract owner must ensure that, as is practical, that suppliers comply with all local, national and other applicable laws and regulations in the regions in which they operate, including modern slavery.		<b>All Staff and Contracts</b> All Staff are responsible for complying with all the Groups’ policies and procedures, including the policies that assist in the identification of modern slavery risks.		

**Our People**

Alliance employees excess of 1,400 staff in Australia, across eight sites. Alliance also relies on the engagement of indirect workers who support our business with the provision of labour and services.

Indirect Labour		
Hired Labour	Contractors	Sub-Contractors
Alliance contracts a proportion of aircraft maintenance staff through labour hire firms	Alliance engages directly with contractors who provide labour.	Sub-contractors are engaged by contractors to provide labour.

Alliance works with a variety of suppliers who provide the group with materials, equipment, inventory and labour to carry out our business. **1,110**  
Direct (Tier 1) suppliers

In FY24 Alliance spent \$516m with 1,110 suppliers. While the majority of our suppliers are based in Australia, we recognise that we are directly linked to modern slavery risks through many tiers of our supply chain between Alliance and the companies that mine, grow, extract, and process the raw materials that go into the items we purchase. **\$516m**  
Total Spend

Our supply chain also comprises the indirect suppliers that provide goods and services to the direct suppliers of the Group, such as the manufacture of clothing that we source from our supplier and the cleaning services used by our external contractors. **84%**  
Australian Based Suppliers

Our supply chain also comprises the indirect suppliers that provide goods and services to the direct suppliers of the Group, such as the manufacture of clothing that we source from our supplier and the cleaning services used by our external contractors. **16%**  
Overseas Based Suppliers

**Geography Risks**

Alliance has identified that none of our direct suppliers are from the Walk Free Foundation Global Slavery Index 2023 10 countries with the highest prevalence of modern slavery. However, it is possible that some of our direct suppliers may obtain their own goods and or services from suppliers located in these countries, meaning that our ‘indirect suppliers’ are a key area of risk to the Alliance Group.

**Category Risks**

Suppliers such as stationery, uniforms, technological devices and hardware may use offshore manufacturing. As we do not have visibility over the locations of these offshore manufacturing locations, there exists a possibility they may be in a country identified by NGOs to have a higher prevalence of modern slavery. Therefore, suppliers using offshore manufacturers are another key risk area for Alliance Airlines.

---

## Sector Risks

The Walk Free Foundation Global Slavery Index 2023 noted the top 5 at risk imports by product into Australia:

- Electronics
- Fish
- Garments
- Solar Panels
- Textiles

Alliance may inadvertently engage vulnerable worths through labour agencies in higher risk industries such as Electronics, Garments and Textiles. As such, we have identified that this is a key risk area for the Group.

## ACTIONS TAKEN TO ADDRESS THE RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAIN

Alliance regularly monitors our direct suppliers for performance and seek confirmation of their own modern slavery reporting requirements or have them adhere to the Alliance Modern Slavery Policy. We actively screen for this in the onboarding of new suppliers.

During FY24 the Alliance Group has embedded in the procurement process, that we will engage in dialog with proposed suppliers to understand the nature and levels of modern slavery risks in their operations and supply chain and how they seek to identify and address any modern slavery risks.

## Key policies address modern slavery risks

- The Group has a **Modern Slavery Policy** which clearly articulates the Group's commitment to identifying, addressing and mitigating risks of modern slavery occurring in our operations or supply chain. The Modern Slavery Policy was reviewed in FY24 to ensure it remains relevant and fit for purpose. No material updates were deemed necessary.
- The Group's **Supplier Code of Conduct** was released in FY24 and provides an additional safeguard in respect to identifying and addressing modern slavery risks in the Group's supply chain.
- The Group's **Whistle-blower Policy** provides for all eligible whistle-blowers to identify and address modern slavery risks, concerns or an improper state of affairs by raising those matters directly with the Chair of the Groups Audit and Risk Committee
- The Group's **Code of Conduct** applies to all directors, employees and contractors and sets the standard for who we work at Alliance and outlines the importance of our corporate values.
- The Group's **Anti-bribery and Corruption Policy** applies to all directors, employees and contracts and outlines the practices that promote ethical business behaviours and principles.

## Training and Awareness

The Group mandates that all employees involved in any form of procurement and or vendor management undertake annual Modern Slavery Risk Awareness training.

Our expectations in respect to Modern Slavery, to those outside our Group of companies, are made clear via the publishing of our Supplier Code of Conduct, Modern Slavery Policy and Modern Slavery Statement on our website.

## REMEDIATION

Alliance requires that where an Alliance Group entity becomes aware that any one or more of our direct suppliers is causing or contributing to modern slavery in their operation or supply chain, the Alliance Group will engage with that supplier to:

1. Investigate the circumstances around the reported occurrence.
2. Develop and agree an appropriate remediation action plan with that supplier.

Remediation will focus on prevention of any recurrences of the relevant supplier's actions that have been found to cause or contribute to instances of modern slavery. Remediated action plans will be developed on a case-by case basis having regard to the circumstance of the reported occurrence and of the direct supplier.

## EFFECTIVENESS OF ACTIONS TAKEN

The Alliance Group acknowledges the necessity of frequently evaluating the effectiveness of our efforts to manage modern slavery risks without our operations and supply chain, as well as the importance of reviewing how we measure the impacts of these actions.

## Training and Awareness

Module	FY24	FY23
Modern Slavery	77	51
Code of Conduct	490	459

## Completion of Modern Slavery

Risk Assessments	212	175
------------------	-----	-----

The effectiveness of our focus on modern slavery is supported by ongoing actions within our business, including the following:

- Regularly reviewing our modern slavery policy to ensure it remains relevant and suitable for our operations and supply chain.
- Documenting and recording all identified breaches of the Alliance Group's Modern Slavery Policy, along with any breaches of other Alliance Group policies and procedures related to modern slavery, the Alliance Group's existing breach register.

- Maintaining a framework that allows modern slavery-related risks, concerns, and breaches to be escalated to Group’s Audit and Risk Committee.
- Defining and measuring Key Risk Indicators related to the completion of modern slavery assessments for both new and current suppliers, as well as metrics associated with periodic review cycles and remediation of unacceptable findings or risk ratings, in order to minimize potential business continuity impacts, in line with our Modern Slavery Policy.

## GOVERNANCE

This Statement was developed by Alliance Aviation Services Limited in consultation with each of the wholly owned subsidiaries of the Group. It should be noted that all of the Group’s entities are subject to the Alliance Group’s policies, procedures and systems and are party to group wide information and resource sharing arrangements. Accordingly, the information detailed in this statement is applicable to all Alliance Group entities.

Formal governance of modern slavery risks occurs through the Group’s Board who approve the annual Modern Slavery Statement. This statement was approved by the Board of Alliance Aviation Services Limited in their capacity as principal governing body of Alliance Aviation Services Limited and is controlled entities on 26-November-2024.

## APPENDIX

Australian Modern Slavery Act – mandatory criteria	Page 1
Identify the reporting entity	Page 2
Describe the structure, operations, and supply chain of the reporting entity	Page 2
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and ay entities that the reporting entity owns or controls	Page 3
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation process.es	Page 4
Describe how the reporting entity assess the effectiveness of such actions	Page 5
Describe the process of consultation with any entities that the reporting entity owns or controls	Page 6