



**Alliance Aviation Services Limited**  
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# Modern Slavery Statement

*This statement covers the activities of the Alliance Aviation Services Limited (ABN 96 153 361 525) ("Alliance" or "Company") and its controlled entities. Its purpose is to understand and implement actions to minimise the risk of modern slavery in our operations and supply chain.*

<b>Document name</b>	<b>Modern Slavery Policy</b>
Applicability	National
Authorisation	Board of Directors
Policy date	November 2019
Policy owner	Company Secretary

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## 1. Introduction

This is the first Modern Slavery Statement (“Statement”) for Alliance, as required by the *Modern Slavery Act 2018* (Cth).

The purpose of this statement is to outline the Company’s approach to ensuring that Alliance has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain.

At Alliance, we recognise that slavery can occur in many forms, as considered in the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

Alliance is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our group. We will not tolerate any forms of slavery in our business.

## 2. Policy Application

This Policy applies to all people who work for or with Alliance including:

- Employees;
- Directors and other officers of the Group; and
- Contractors (including contractor’s employees)
- Consultants engaged by the Group
- Suppliers (including employees of suppliers)
- Clients (including employees of clients)
- Relatives, dependants and spouses

and associates of the individuals above. Those people are referred to in this Policy as “Relevant Persons”.

## 3. Our business

Alliance is a proud Australian company and is Australasia’s leading provider of contract, charter and allied aviation services currently employing in excess of 500 full time staff in Australia.

The business currently operates a fleet of Fokker F100, Fokker 70LR jet aircraft and Fokker 50 turboprop aircraft. These aircraft are all registered on the Australian aircraft register and are domiciled in Australia.

The Company has operational bases in Brisbane, Townsville, Cairns, Melbourne, Adelaide, Perth, Rockhampton, Melbourne and Darwin.

Alliance is a listed entity and its shares are quoted on the Australian Stock Exchange.

#### **4. Structure, Operations & Supply Chains**

This statement covers the activities of Alliance and its controlled entities. A complete list of controlled entities can be found in the FY2019 Alliance Annual Report (page 56, [www.allianceairlines.com.au/investor-centre/investor-centre](http://www.allianceairlines.com.au/investor-centre/investor-centre)).

Alliance is structured as a single operational entity, with divisions along operating lines i.e.:

- Corporate Services;
- Engineering; and
- Operations.

Alliance utilises the services of sub-contractors in its engineering division.

The Alliance supply chain includes products and services sourced from suppliers based both in Australia and overseas (being predominately Europe and USA) and is split as follows:

- 73% Australia
- 18% Europe
- 4% USA & Canada
- 5% Other

#### **5. Risks of modern slavery practices in the operations and supply chains**

As part of compiling this first Modern Slavery Statement, Alliance undertook a high level review of its operations and supply chain to better understand where potential risk of modern slavery practices may be found.

During the review process, we considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices, in accordance with the Australian Government's Department of Home Affairs draft guidance document (2018).

Alliance also took into consideration other risk factors such as the sector, industry, types of products and services, geographic locations and Alliance's business models.

The result is that Alliance has been able to identify areas with no or low risk of modern slavery practices, for example, in any flight operations and engineering activities that are directly undertaken by Alliance employees and covered by our internal processes.

Alliance also identified potential risk 'hotspots' – e.g. where a local supplier may source a product, such as uniforms, textiles (carpets, seat covers) and technology products/services from overseas sources, which may have a record of having modern slavery practices still in place.

The risk 'hotspots' will be a priority of our supplier engagement review activities over the balance of this calendar year.

In FY19 Alliance engaged with approximately 230 suppliers from seven countries. Approximately 90 per cent of the Company's total spend was with 74 suppliers. In addition our suppliers often have many suppliers of their own, who then also rely on suppliers.

More than 99% of the Company's expenditure, with suppliers, are suppliers based in low-risk countries as defined by the OECD.

## **6. Actions taken by the reporting entity to assess and address these risks including due diligence and remediation processes**

Alliance has formal policies in place that are intended to promote ethical and legally compliant business conduct. The policies that reflect Alliance's commitment to prevent violations of human rights such as modern forms of slavery in its business include the Code of Conduct and Whistle-blower Policy.

Alliance's procurement and quality teams have a number of risk mitigation and robust procurement processes in place including supplier engagement principles, supplier onboarding requirements and a supplier audit program.

All suppliers are required to comply with Alliance's standard Purchase Order Terms & Conditions which include standards on human rights, ethical business practices, safety and environment.

Alliance operates in one of the most highly regulated and audited industries in the world. A large portion of Alliance's supply chain is required to undertake both internal and external audits as part of their ability to provide services/products. In addition to this, back to birth traceability of a number of products is a requirement of Alliance's procurement department.

The above procedural controls and policies are reviewed frequently to ensure that robust processes continue to be in place to minimise the risk of modern slavery in our operations and supply chain.

Good governance is a key continuing focus for the board and senior management of Alliance. The risk of modern slavery within Alliance and its supply chain is assessed by the Board's Audit Committee, with a heavy focus on the Company's senior management working with suppliers to ensure that the Alliance expectations in respect to modern slavery are fully understood and the exposure to human rights risks are minimised.

The Company has invested in training for the procurement team to ensure awareness of the risks of modern slavery and ensure they are able to work with suppliers to identify and reduce the risks of human rights violations.

The Company reviews the findings of all supplier audits. Where problems are identified Alliance works with the supplier to develop corrective actions with agreed timeframes as part of the remediation plan. Corrective actions are reviewed and if suitable the audit findings are closed. In instances where suppliers do not improve their performance or acquit audit findings, despite our attempts at engagement, we may terminate supply contracts and/or switch to alternate suppliers.

Alliance has a number of mechanisms for employees and third parties to anonymously report suspected or actual illegal activity or breaches of Company policy, including the Company's Code of Conduct and human resources policies. Employees and third parties are able to access a whistle-blower system by phone or email. Each whistle-blower disclosure received is investigated and reported to the appropriate delegate as per the whistle-blower Policy. The instances and outcomes of the whistle-blower investigations are reported to Alliance Audit Committee.

## **7. Assessment of effectiveness of these actions**

The Company, in the current year has not identified any instances of modern slavery.



*Scott McMillan*  
*Managing Director*