

KELLY PARTNERS GROUP HOLDINGS LIMITED

ACN 124 908 363

MODERN SLAVERY POLICY

Date: July 2024

1. BACKGROUND

- 1.1 *Modern Slavery Act 2018 (Cth) (Act)* defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services and the worst forms of child labour.
- 1.2 Modern Slavery concerns the worst forms of exploitation of people, it is both a crime under Australian and international law.

2. PURPOSE

- 2.1 Kelly Partners Group Holdings Limited and its controlled entities (collectively the **Group**) is committed in ensuring that it complies with modern slavery regulations.
- 2.2 The Group takes a zero-tolerance approach to modern slavery and is committed to respecting and protecting the human rights of our employees, customers and those of our suppliers and business partners.
- 2.3 This Modern Slavery Policy (**Policy**) sets out the Group's approach in addressing the risk of modern slavery practices in its operations and supply chains.

3. SCOPE

- 3.1 This Policy applies to all employees, directors, contractors and other third parties engaged and undertaking work for and on behalf of the Group (**Personnel**), wherever they may be located and irrespective of an individual's particular role or responsibilities.
- 3.2 The Group expects all who have or seek to have a business relationship with the Group to familiarise themselves with this Policy and to act in a way that is consistent with its values. The Group will only do business with organisations who fully comply with this Policy or those who are taking verifiable steps towards compliance.
- 3.3 This Policy will be used to meet any statement on slavery and human trafficking obligations that the Group is required to produce in accordance with the Act.

4. COMMITMENT

- 4.1 The Group is committed in ensuring that:

- a) its operations and supply chains do not cause, involve or contribute to modern slavery;
- b) any contractors, suppliers, collaborators and others with whom the Group conducts business with respect and share the Group's commitment to minimise modern slavery risk; and
- c) the effectiveness of measures to ensure continual process improvement is evaluated periodically.

4.2 Our annual Modern Slavery Statement will contain an assessment of our present risks of being involved in Modern Slavery. It will also include steps to be undertaken to bolster our competencies in understanding risk of modern slavery in our supply chains and our plans for future improvements.

5. WORKPLACE

5.1 The Group is committed to:

- a) complying with relevant laws, community and ethical standards related to human and modern slavery in respect of our employees and business; and
- b) ensuring the health, safety and wellbeing of our workforce and that our processes and procedures are compliant with this Policy and other occupational health and safety laws.

5.2 The Group treats people with respect and dignity and does not tolerate discrimination or harassment.

6. SUPPLY CHAIN

6.1 The Group acknowledges the potential for modern slavery to occur in our supply chains.

6.2 Our suppliers are expected to manage their business in an ethical manner respecting human rights and to ensure that all employees, contractors are legally entitled to work and no bonded, forced or involuntary labour, child labour, human trafficking or other forms of slavery is employed in the delivery of their products and services to the Group.

6.3 The Group will endeavour to conduct risk assessments on its supply chain and seek to identify risks of modern slavery in its supply chain. Where appropriate, the Group will engage directly with our suppliers to ensure compliance with this Policy.

7. REPORTING

7.1 The Group encourages employees, affiliates and others to raise concerns about potential breach of this Policy or any illegal or unethical behaviour.

7.2 Where concerns are raised, the Group will conduct an investigation in accordance with regulatory requirements and applicable policies and procedures.

7.3 The Group also maintains Whistleblower Policy that promotes and supports a culture of compliance, honesty and ethical behaviour. Please refer to this policy or further details and reporting process.

8. BREACH OF THIS POLICY

8.1 Any employees who have been found to have breached this Policy may face disciplinary action up to and including the termination for cause of employment or termination for cause of any contract under which they provide services to a member of the Group.

8.2 The Group may terminate our business relationship with our suppliers, contractors and business partners if they have been found to have breached this Policy.

9. MONITORING, TRAINING AND REVIEW

9.1 The Board has overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it. Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this Policy and are given adequate and regular training on it.

9.2 This Policy must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

9.3 Training on this Policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this Policy. In addition, all employees may be asked to formally accept conformance to this Policy on a periodic basis.

9.4 This Policy will be reviewed periodically. Any amendments to the Policy are to be approved by the Board.

Policy version:

Created	July 2014
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