

KINETIC IT MODERN SLAVERY POLICY

Kinetic IT's social licence to operate is premised on trust, transparency and ethical conduct. Upholding these values is integral to our identity and our commitment to being a positive force for change in the community.

This policy outlines Kinetic IT's commitment to collaboratively engaging employees, contractors, and suppliers to combat modern slavery, raise awareness and to ensure compliance with the *Modern Slavery Act 2018* (Cth) (the Act).

SCOPE

This policy applies to all operations and activities of Kinetic IT and extends to our directors, employees, contractors and suppliers.

Compliance with this policy is the responsibility of all Kinetic IT directors, employees and contractors irrespective of role title or level of seniority. Kinetic IT expects its suppliers to uphold the same standards set out in this policy in their own operations and in dealings with their suppliers.

DEFINITION

For the purposes of this policy, *Modern Slavery* has the meaning given to it under the Act and includes practices such as slavery, servitude, forced labour, deceptive recruiting, forced marriage, debt bondage, trafficking in persons and child labour.

KEY PRINCIPLES

Kinetic IT's corporate values and policies guide decision-making in relation to modern slavery risk. We implement due diligence measures throughout the procurement lifecycle to engage ethically responsible suppliers who align to our standards.

Kinetic IT's modern slavery policy is premised on the following key principles:

- we are committed to promoting ethical principles and practices to prevent modern slavery and ensure compliance with all applicable modern slavery laws and regulations.
- we integrate supply chain risk assessments into our supplier selection and management process.
- we follow a risk-based approach and tailor our due diligence efforts based on supplier risk levels.
- we educate employees and key stakeholders on identifying and addressing modern slavery risks.
- we require suppliers to comply with all relevant modern slavery laws and demonstrate ethical labour practices. Where modern slavery is identified, suppliers must take immediate and appropriate actions to remedy the situation.
- we expect our suppliers to notify Kinetic IT of any potential or actual modern slavery practices within their business that may affect their relationship with Kinetic IT.

OBJECTIVES

We aim to:

- eliminate modern slavery practices in our operations and supply chains.
- foster partnerships with suppliers and stakeholders to build ethical practices and shared responsibility.
- proactively assess and monitor modern slavery risks in our supply chain.

- promote awareness and responsibility across our workforce and supplier network.
- review and enhance our processes to address evolving risks and best practices.

MODERN SLAVERY RISKS IN SUPPLY CHAIN

Kinetic IT is committed to taking proactive steps to reduce the risk of modern slavery within its supply chains. As part of this commitment, Kinetic IT requires all suppliers to comply with the following standards:

- **Prohibition on Child Labour:** Suppliers must not engage in any form of child labour, as defined by the International Labour Organisation (ILO), that includes work that deprives children of their childhood, potential, dignity, or is harmful to their physical and mental development—this includes work that is mentally, physically, socially or morally dangerous and harmful to children or interferes with their schooling.
- **Voluntary Labor Practices:** Suppliers must not use any form of forced, bonded or involuntary labour. All labour must be voluntary and workers must retain control over their personal identification documents including passports and work permits.
- **No Employment Fees:** Suppliers must not charge workers fees in connection with obtaining employment.
- **Prohibition of Coercion:** Suppliers must not engage in mental or physical coercion, abuse, or punishment of workers under any circumstances.
- **Compliance with Labour Laws:** Suppliers must comply with all applicable laws and mandatory industry standards regarding working hours, overtime, wages and benefits.
- **Freedom of Association:** Workers must be free to join or not join unions or employee representation groups without fear of retaliation or intimidation.
- **Fair Treatment of Workers:** Deductions from wages as a disciplinary measure are prohibited (except where legally permissible).
- **Modern Slavery Act Compliance:** Suppliers must comply with the Act and actively implement measures to identify and mitigate risks of modern slavery within their operations and supply chains.

MODERN SLAVERY RISKS IN OPERATIONS

As a people-focused IT services organisation, Kinetic IT recognises that the risk of modern slavery within our direct operations is relatively low. Kinetic IT is committed to practices that identify and manage potential risks through robust due diligence practices, supplier engagement and ongoing awareness across our business and supply chain.

NON-COMPLIANCE WITH THE POLICY

Kinetic IT relies on and encourages its employees, contractors, and suppliers to report any instances that may indicate a risk, potential or actual, of modern slavery occurring within the supply chain, operations, or activities of Kinetic IT, its suppliers or third parties. Concerns related to modern slavery, including conduct that may breach this policy, can be reported through the following channels:

- Kinetic IT's external whistleblowing service "Conduct Watch". Disclosures made in accordance with Kinetic IT's Whistleblower Protection Policy may qualify as protected disclosures, meaning individuals are entitled to certain legal protections, including confidentiality and protection from reprisal.

Reports can be made using any of the following methods:

- Email: kineticintegrity@deloitte.com.au
- Hotline: 1800 980 685
- Online: www.KineticITintegrity.deloitte.com.au
- Post: Kinetic IT Integrity
Reply Paid 12628 A'Beckett Street
VICTORIA 8006

- Kinetic IT's Procurement Team: Suppliers must report any violations of this policy directly to the Procurement team at Procurement@kineticit.com.au.

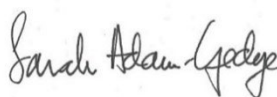
RELATED DOCUMENTATION

The following suite of policies and standards are relevant to identifying, preventing and mitigating modern slavery risks in Kinetic IT's supply chain and operations:

- Supplier Code of Conduct
- Code of Conduct
- Whistleblower Protection Policy
- Kinetic IT Modern Slavery Statement



Michael North
Chief Executive Officer



Sarah Adam-Gedge
Chair