

Modern Slavery Policy

Objective

This policy outlines the commitment of K&S Freighters Pty Ltd (ACN 007 544 390) and the K&S group of companies (collectively “K&S”) to the identification and elimination of modern slavery including forced labour, human trafficking and child labour. K&S values human rights, equality and ethical business practices and will not conduct business with any parties who do not share K&S’ zero-tolerance approach within their operations and supply chain(s).

Purpose

The purpose of this policy is to ensure K&S’ compliance with the *Modern Slavery Act 2018* (“Act”), any replacement Acts, relevant State Acts and Regulations enacted from time to time. This policy aims to minimise the risk of modern slavery occurring within K&S, its supply chains and in any other parties engaged by K&S.

Scope

This policy applies to all officers, employees, contractors, representatives and consultants of K&S (“K&S personnel”). K&S expects that all parties who have a business relationship with K&S will act in accordance with this policy.

Policy

K&S is committed to acting ethically, with integrity and transparency in all business dealings. K&S respects ethical labour practices, values and promotes diversity, and has a zero tolerance approach to any form of modern slavery in its operations and supply chain.

All forms of modern slavery have in common the deprivation of a person’s liberty by another in order to exploit them for commercial or personal gain, and amount to a violation of an individual’s fundamental human rights.

All K&S employees, contractors and sub-contractors must not engage in any practices of modern slavery which encompasses servitude, forced labour, debt bondage and human trafficking, and also includes the following:

- Using deceptive or coercive practices during recruitment or employment, such as making material misrepresentations about the key terms and conditions of employment;
- Destroying, concealing, confiscating or otherwise denying access to any employee’s identity or immigration documents (for example passports or drivers’ licenses);
- Providing or arranging housing that fails to meet host country housing and safety standards;
- Employing any child under the age of 15;
- Procuring commercial sex acts;
- Using forced labour in the performance of any contract;
- Failing to provide an employee contract, recruitment agreement or other required work document in writing (where one is required by law);
- Using recruiters or suppliers that do not comply with local labour laws; and
- Charging employees recruitment fees.

Pursuant to the Act, K&S will publish annual public reports (Modern Slavery Statements) on its actions to address modern slavery risks in its business operations.

K&S will ensure that its policies and procedures address modern slavery and ethical sourcing risks in its operations and supply chains.

K&S will ensure that its operational and supplier contract terms include a prohibition against modern slavery, requirements to comply with all minimum standards and reporting requirements in the Act, promote best practice. K&S must be notified if the supplier becomes aware of any actual or suspected breach of the Act. K&S' contracted suppliers will be required to hold their own suppliers to the same standards. K&S reserves the right to terminate any contractual arrangement if there is a breach of this policy.

All K&S Personnel will be required to remain vigilant to risk in all aspects of K&S' business and business relationships. K&S will ensure that employees receive adequate awareness training in relation to the obligations under this policy and the Act.

Breaches of Policy

Any suspected breach of this policy will be promptly investigated and appropriate disciplinary and remedial action will be taken by K&S. K&S employees who do not strictly comply with this policy may face disciplinary action, including immediate dismissal.

Review

The contents of this policy will be reviewed on an annual basis by the General Counsel / Company Secretary to ensure that it complies with relevant laws and remains relevant and effective.

Application of Policy

All current and new K&S employees will be issued with a copy of this policy.

K&S employees will be promptly notified of any material changes to this policy by the General Counsel / Company Secretary.

This policy, and any changes to it, must be endorsed by the Board of Directors.

K&S Corporation - Board of Directors

Adopted: 27th August 2020
Reviewed: 18th August 2021
Review Date: 27th August 2022