# 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

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| Adopted: | 27th August 2020 |
| Reviewed: | 28th August 2026 |
| Review Date: | 27th August 2027 |