



Kinatico Ltd

Modern Slavery Policy

April 2022

Table of Contents

Contents

Kinatico Ltd.....	1
Modern Slavery Policy.....	1
Table of Contents.....	2
Introduction.....	3
Preamble	3
Purpose of Policy	3
Policy	3
Scope	3
Roles & Responsibilities	4
Chief Financial & Operating Officer (CFOO)	4
Finance Manager	4
Kinatico Ltd Executive Leadership Team (ELT)	4
Employees, Contractors, Temporary staff, and Consultants.....	4
Procedure.....	4
New Supplier	4
Existing Suppliers	4
Assessment Criteria.....	4
Adverse Findings	5
Definitions / Artefacts.....	5
Review and Publication of this Policy.....	5
Document Control.....	5
Version Control.....	5

Introduction

Preamble

On 1st January 2019, the Commonwealth Modern Slavery Act 2018 (the Modern Slavery Act) came into effect. It established, for certain organisations, reporting requirements to support the Australian business community to identify and address their modern slavery risks, and to maintain responsible and transparent supply chains.

While not an organisation that has obligations under the **Modern Slavery Act 2018 (Cth)** (“the Act”), Kinatico Ltd (“Kinatico”) none-the-less recognises an ethical obligation to consider the intent of this legislation.

Kinatico therefore seeks to limit the risk of modern slavery occurring within our supply chain. Kinatico will take commercially reasonable steps to ensure that we limit any risks with our goods or services suppliers.

Furthermore, as Kinatico is not an organisation with statutory obligations to complete a Modern Slavery Statement (“Statement”), any reporting will be internal only.

Purpose of Policy

This document defines Kinatico’s policy for limiting the risk of all forms of modern slavery from our supply chain, and sets out whether, when, and how we will undertake any necessary verifications.

It includes Kinatico Board reporting requirements.

Policy

The purpose of this Modern Slavery Policy is to ensure that Kinatico:

- complies with the intent of the Modern Slavery Act and relevant local and national laws;
- sources products and services in accordance with legal obligations and community expectations; and
- acts, and works with suppliers, to minimise the potential for modern slavery in the Kinatico business and supply chain.

This policy should be read in conjunction with Kinatico’s following policies:

- Code of Conduct,
- Supplier Management Policy, and
- Whistleblower Policy.

Scope

This Policy applies to:

- employees, contractors, temporary staff, and consultants; and
- those third parties from whom Kinatico purchases goods or services.

Whether Kinatico should seek confirmation of agreement to our Supplier Code of Conduct will be based on an assessment of the supplier. Only those considered “high” risk will be assessed via questionnaire.

Roles & Responsibilities

Chief Financial & Operating Officer (CFOO)

The CFOO has responsibility for ensuring compliance with this policy.

The CFOO will prepare a report, based on assessments made and confirmations sought – this will be presented to the Kinatico Board on a quarterly basis.

Finance Manager

The Finance manager has responsibility for:

- assessing suppliers as set out below, and
- seeking supplier confirmation of agreement to our Supplier Code of Conduct.

The Finance manager will report findings to the CFOO.

Kinatico Ltd Executive Leadership Team (ELT)

The ELT have responsibilities as set out below – see Review and Publication of this Policy.

Employees, Contractors, Temporary staff, and Consultants

All personnel are to be aware of this policy, and other related policies, and consistent with Kinatico's Whistleblower Policy, understand their obligations to report anything they believe breaches any policy.

Procedure

New Supplier

Together with the Kinatico Ltd Legal Counsel, the Finance Manager will assess new suppliers. Based on that assessment, should the supplier be considered "high risk", the new supplier will be asked to complete the Code of Conduct questionnaire.

Existing Suppliers

A periodic review will be undertaken of existing suppliers, any re-assessed as "high risk" will trigger Kinatico to request the supplier to complete the Code of Conduct questionnaire.

Assessment Criteria

Assessments will consider:

- The size and nature of the supplier's business (i.e. we would not need to seek an assessment of a large public or well-known company – their reputational damage would be a deterrent for such an organisation);
- The size and nature of the business we have with the supplier (i.e. for some suppliers, we only conduct a single check – it would be commercially unreasonable to do further checks);
- Geographies in which the supplier operates; and
- The supplier's industry – e.g. professional organisations vs labour-intensive, unskilled industries.

Other considerations may be included as needed, or as directed by the ELT.

Adverse Findings

Should an adverse finding be made for a supplier, Kinatico will:

- First seek to have the supplier remedy the finding, and
- Should the supplier be unable or unwilling to remedy the finding, Kinatico will endeavour, where possible, to remove that supplier from our Supply Chain.

Definitions / Artefacts

Supplier Code of Conduct	Kinatico requests our Suppliers complete a “Supplier Vendor Form”. The “Supplier Vendor Form” has an embedded Supplier Code of Conduct, and we request our Suppliers to complete and sign this document acknowledging that they will conduct business in an honest, transparent, and ethical manner.
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Review and Publication of this Policy

The Kinatico Ltd Executive Leadership Team (ELT), with guidance from the Kinatico Ltd in-house Legal Counsel will review this Policy annually to confirm that it represents an ethical response to the **Modern Slavery Act 2018 (Cth)**. The ELT may, in its discretion, adjust or exclude a specific requirement of this Policy from time to time, either generally or on a case-by-case basis. This Policy may be amended, ceased, or replaced, by the ELT.

Document Control

Policy Owner / Approver	Craig Sharp
Title	General Counsel
Next Review	November 2022

Version Control

Version	Date	Author	Title	Notes
01.0	7/10/2021	Michael Sheard	Bid Coordinator	Creation
01.2	4/11/2021	Michael Sheard	Bid Coordinator	Responsibilities clarified.
01.3		Craig Sharp	General Counsel	Approved by Board
01.4	4/10/2022	Craig Sharp	General Counsel	Change of company name