



# Kinetic Modern Slavery Statement

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Revision 0

Consult Kinetic Way Document Matrix/Register to confirm the current revision status of this document.

NOTE: The Approval Date is to be handwritten by the approver, in the format DD-MMM-YY, on the date approved.

A	Issue for Implementation	AMO	ASL	TVE	AMO	22-Mar-21
Rev	Description	By	Checked	QA	Approved	Date

Print Date: 25-Mar-21



Johnston's

SkyBus



Sutcliffe

telfords

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SIGNATURE BLOCK GUIDELINES:

**By:** Originator of the document.

**Checked:** Check for clarity, correctness and consistency, as well as grammar and spelling, by the originators' supervisor, another discipline manager, a peer, or equivalent; in accordance with the Delegation of Authority Matrix.

**QA:** Checked by the General Manager HSEQ or delegate, for overall compliance to Kinetic Way requirements.

**Approved:** Overall approval of the document contents, and commitment to implement; in accordance with the Delegation of Authority Matrix. Approval is generally not to be delegated.

**Notes:**

- There must be three unique initials signing off among the four columns
- Name abbreviations are centrally recorded in the Kinetic Way Manual (KIN-HSEQ-002)
- Printed documents without inked initials cannot be considered latest or approved
- The approval date should be handwritten by the approver, on the actual date the document is approved
- Revisions to approved Kinetic Way documents are controlled via coordination with the General Manager HSEQ, and
- Revisions to approved Business Unit documents are controlled via coordination with the Business Unit Safety and Wellbeing Managers.

REVISION HISTORY:

This table describes changes made for numerical revisions after Rev 0

Date	Rev	By	Description

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## **1 INTRODUCTION**

Modern slavery is estimated to affect approximately 40 million people worldwide and takes place in serious forms of exploitation including human trafficking, forced labour and debt bondage/forced labour. Forced labour is the world's most widespread form of modern slavery, with an estimate of 25 million people affected in many countries including Australia. These abuses can occur in all industries and sectors, including the transportation industry.

Kinetic TCo Pty Ltd (ACN 601 251 067) (Kinetic TCo) and its subsidiaries (together, Kinetic) condemns modern slavery in all of its forms and supports the objectives of the Modern Slavery Act 2018 (the Act) of assisting the business community in Australia to take proactive actions to address modern slavery and help mitigate the risk of modern slavery practices in Australia. Kinetic TCo Pty Ltd makes this statement pursuant to section 13(1) of the Act for the financial year ended 30 June 2020. This statement will be reviewed and updated on an annual basis

## **2 KINETIC'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS**

Kinetic TCo is the ultimate parent company of a group of companies it wholly controls providing transit services (Kinetic or the Group). This statement is made on behalf of Kinetic. Kinetic TCo is the ultimate parent company of a group of companies that comprise Kinetic. Kinetic TCo is incorporated in Australia with headquarters in Melbourne. Kinetic and its businesses employ over 4,100 people across Australia and New Zealand, move approximately 60 million people annually on our fleet over 2,400 buses.

Kinetic's operations predominantly include the provision of bus transit services in metropolitan, rural and regional areas of Queensland, New South Wales, Victoria, Tasmania and New Zealand including airport and route bus services. Kinetic operates under the banners of Campbells Coaches, Go Bus, SkyBus, Sunbus, Surfside Buslines, Telfords Bus & Coach and Johnston's.

To assist delivery and improvement of these services, Kinetic works with a network of suppliers. To that end, its supply chain includes the manufacture of bus parts, fuel supply, vehicle maintenance, and also includes services which contribute to its operations such as depot cleaning, bus cleaning, IT and telecommunication services.

## **3 KINETIC'S RISK OF MODERN SLAVERY IN ITS OPERATIONS AND SUPPLY CHAINS**

Operating within a global supply chain, Kinetic is aware of the potential for it to cause, contribute to, or be linked to modern slavery through its operations and supply chain, and more importantly, the role it can play in helping to reduce these practices. In particular, there is a high risk of modern slavery practices taking place in the course of the supply of services such as the supply of petroleum and vehicle and parts manufacturing.

## **4 HOW KINETIC ADDRESSES MODERN SLAVERY PRACTICES**

As part of Kinetic's commitment to furthering the objectives of the Act, over the next 12 months, the Group will undertake an audit of our major suppliers to identify those who may pose a potential risk of modern slavery practices. This audit will involve a risk assessment analysis to identify key areas of concern and improvement.

The audit process will be ongoing and may include employees of Kinetic undertaking recurring site visits to our suppliers (including, where possible, site visits to our internationally based manufacturers or major suppliers). When engaging with new suppliers, Kinetic is also looking to require suppliers to adhere to obligations under the Act and to comply with Kinetic's policies and procedures regarding modern slavery practices. This will include a procurement procedure to assist with improving our analysis of modern slavery risk assessment and practices of our suppliers. Specifically, the Kinetic policies deal with human rights issues, forced and child/youth labour, diversity and equal opportunity and minimum employment conditions.

## **5 KINETIC'S COMPLIANCE FRAMEWORK**

Kinetic is committed to improving its practice to combat modern slavery. To that end, Kinetic is committed to continually reviewing and updating its policies and procedures to maintain the appropriate safeguards against any mistreatment of persons involved in our supply chain or our business, and ensure it sources from suppliers who meet our requirements with respect to modern slavery.

Over the previous year, we have overhauled the Kinetic policies and procedures framework, the Kinetic Way, including the development of structures to allow appropriate review and analysis of our suppliers. As part of our ISO accreditation obligations, we have an internal and external audit procedure to actively evaluate and control Kinetic's compliance with our own policies. We are also looking to monitor reported trends and cases of modern slavery occurring in supply chains and operations similar to ours. Modern slavery training is being developed for Kinetic employees and will be rolled out within the organisation over the next 12-18 months.

## **6 KINETIC'S KEY AREAS OF ACTION**

Kinetic has a zero-tolerance policy to modern slavery in all of its forms. In order to solidify our commitment to reducing the risk of modern slavery within our operations and supply chain, the Group commits to undertaking the following activities:

- A more thorough and detailed risk assessment analysis of all our supply chains to identify key areas of risk in relation to modern slavery
- Routinely review and update all policies and procedures to ensure compliance with our obligations under the Act
- Continually review and update supplier contract templates to ensure all suppliers are aware of modern slavery legislation
- Develop a supplier pre-qualification checklist to allow us to request information and evidence with respect to modern slavery prior to engaging suppliers
- Regular consultation meetings between the procurement teams of each relevant subsidiary of Kinetic, where each relevant entity provides progress updates on their ongoing processes to address modern slavery practices, and
- Provide training to all relevant Kinetic employees to ensure everyone within the Group are familiar and aware with modern slavery requirements.

Kinetic is committed to continually improving its position with respect to anti-modern slavery policies and procedures. This is a testament to our values as a business, which is evident in our existing policies and governance frameworks. Kinetic is aware of the importance of continually building its understanding, oversight and management of modern slavery risks in its operations and supply chains.

The Board of the members of Group subsidiaries comprise our two CEOs, who are also members of the Kinetic TCo board. Accordingly, this structure is the mechanism by which this statement is communicated, considered and therefore consulted as part of the preparation and approval of this statement.

## STATEMENT APPROVAL

This statement is made on behalf of Kinetic TCo and the following Australian subsidiaries: Kinetic Holding Company Pty Ltd (ACN 601 254 880), Avalon Airport Express Pty Ltd (ACN 615 862 710), BTI Pty Limited (ACN 010 155 398), Bus & Coach Support Services Pty Ltd (ACN 615 112 760), Calabro Bros Holdings Pty Ltd (ACN 615 924 783), Comity Pty Ltd (ACN 007 245 132), Gulf Tech Pty Ltd (ACN 603 693 116), Kinetic (NSW) Pty Ltd (ACN 168 516 014), Kinetic BusCo (Melbourne) Pty Ltd, Kinetic Fleet Services (Melbourne) Pty Ltd, Kinetic Group Services Pty Ltd (ACN 615 925 445), Kinetic PropCo Pty Ltd (ACN 632 539 407) as trustee of Kinetic Property Trust (ABN 50 489 752 099), Kinetic PropertyCo (Melbourne) Pty Ltd, Marrickville Bus Lines Pty Ltd (ACN 050 034 127), Surfside Buslines Pty Ltd (ACN 010 957 552), Transit Australia Group Pty Ltd (ACN 600 302 725), Transit Australia Pty Ltd (ACN 065 794 943), TAG Mobility Services Pty Ltd (ACN 622 327 431), Reyipo Holdings Pty Ltd (ACN 160 949 066), Skybus (QLD) Pty Ltd (ACN 621 666 831), Telford Educational Tours Pty Ltd (ACN 057 934 148) and Yourbus Pty Ltd (ACN 600 741 615).

Approved by the Board of Kinetic TCo on 16 December 2020.

Signed,



Adam Begg  
Co CEO's Kinetic  
March 2021



Michael Sowards