

KELLY PARTNERS GROUP HOLDINGS LIMITED MODERN SLAVERY STATEMENT 2024

1. INTRODUCTION

This Modern Slavery Statement is made on behalf of Kelly Partners Group Holdings Limited (ACN 124 908 363) and its controlled entities (“Kelly+Partners”, “Group”, “We”) pursuant to the Modern Slavery Act 2018 (Cth) for the period 1 July 2023 to 30 June 2024.

Kelly+Partners is committed to maintain human rights and does not condone practices that constitute modern slavery. We recognise the responsibility to manage the risks associated with modern slavery infringements. Kelly+Partners ask its employees, clients, partners to raise any issues or concerns regarding potential infringements or modern slavery practices.

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Kelly Partners Group Holdings Limited ACN 124 908 363 (ASX: KPG) is a publicly listed company incorporated in Australia and has its office at Level 8, 32 Walker Street, North Sydney NSW 2060 Australia.

Kelly+Partners is a specialist chartered accounting network which consists of 37 operating businesses with the primary focus on providing accounting, taxation and other business advisory services to private clients, private businesses and private business owners. Kelly+Partners employs over 550 people, including over 90 partners across 35 locations in Australia, Hong Kong, India and the United States.

Kelly+Partners’ supply chain consists of those entities that support the provision of our accounting, taxation and professional services in the geographies which we operate. Our supply chain includes leases for the properties we occupy, catering and cleaning services, some outsourced business process services, recruitment and employment agencies and the purchase of goods including office furniture, supplies, IT software and hardware.

The vast majority of goods and services sourced locally in Australia and in the United States. However, we acknowledge that some local suppliers may also have international supply partners. As this may increase the risk of modern slavery we are dedicated in identifying the origin of these goods and services.

3. THE RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

3.1 Kelly+Partners’ own operations

Kelly+Partners is required to adhere to regulations and professional conduct standards in the jurisdictions which we operate, including labour and award safeguards for employees, as well as safe working environment protections.

Given the nature of our professional services, we consider the risk of modern slavery in our own operations to be very low as both the industry and jurisdictions in which we operate present a low inherent risk of forced labour, child labour and other forms of modern slavery.

The key factors that support a low risk rating in the professional services industry include the office-based nature of work, low proportion of characteristically vulnerable workers typically found within the workforce and the higher level of skill required to perform the work within the accounting sector.

3.2 Kelly Partners' supply chain

We recognise that through our supply chain, we can be indirectly exposed to the risk of modern slavery.

Our suppliers are predominantly located within Australia and the United States. Both jurisdictions are rated 'low risk' according to the internationally recognised Walk Free 2023 Global Slavery Index and the US Department of States' 2023 Trafficking in Persons Report.

Kelly+Partners is continuing to assess its modern slavery risk in its supply chain based on location, goods and services supplied, high risk sectors or industries and entity-specific risks.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

Kelly+Partners has adopted group-wide policies and procedures relating to ethical work practices and legal complaint business practices designed to mitigate our exposure to modern slavery and human right risks. All Kelly+Partners employees have the responsibility to act with integrity and in accordance with the corporate policies, including:

- Modern Slavery Policy
- Code of conduct
- Bullying & Harassment Policy
- Work Health and Safety Policy
- Office Etiquette Policy
- Diversity and Inclusion policy
- Anti-Bribery and Corruption Policy
- Whistleblower Policy

Kelly + Partners requires all team members to acknowledge the companies' policies and complete ongoing training to ensure a competent understanding of a safe and respectful work environment. We support and encourage the reporting of any improper conduct witnessed.

Our approach to preventing and mitigating the risk of modern slavery in our supply chain includes dealing with reputable business within Australia and internationally. Going forward, Kelly+Partners will look to improve our procurement practices through a more comprehensive supplier due diligence process that captures and assess relevant organisational information. This information capture will also be rolled out to our major existing suppliers, allowing us to build a comprehensive risk profile across our supply chain. Standard contractual terms will also be developed that will provide a baseline for our future supplier engagements.

5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

With the introduction of our enhanced procurement and supplier due diligence process, Kelly+Partners will be able to track the progress of our modern slavery program via the engagement of our suppliers, the number and timeliness of our queries and feedback on our supplier due diligence process.

Further, we can measure our program's effectiveness through our employee's completion rate of training modules as well as their ability to confidently challenge and educate our suppliers.

6. PROCESS OF CONSULTATION

Kelly+Partners takes a collaborative approach in combatting modern slavery. We consult and engage with our controlled entities to ensure that the modern slavery risks relating to our controlled entities have been appropriately identified and that its related entities are aware of what actions it needs to take.

Other parts of our consultation process include group wide assessments, training programs, supplier data sharing and discussions with relevant stakeholders of our controlled entities.

As part of our ongoing process improvement, these consultations will continue to run and be refined over time to achieve process efficiencies.

7. BOARD APPROVAL

This statement was approved by the Board of Directors of Kelly+Partners on 20 August 2024.

Signed for and on behalf of the Board of Kelly Partners Group Holdings Limited



Brett Kelly
Founder and Executive Chairman
13 December 2024