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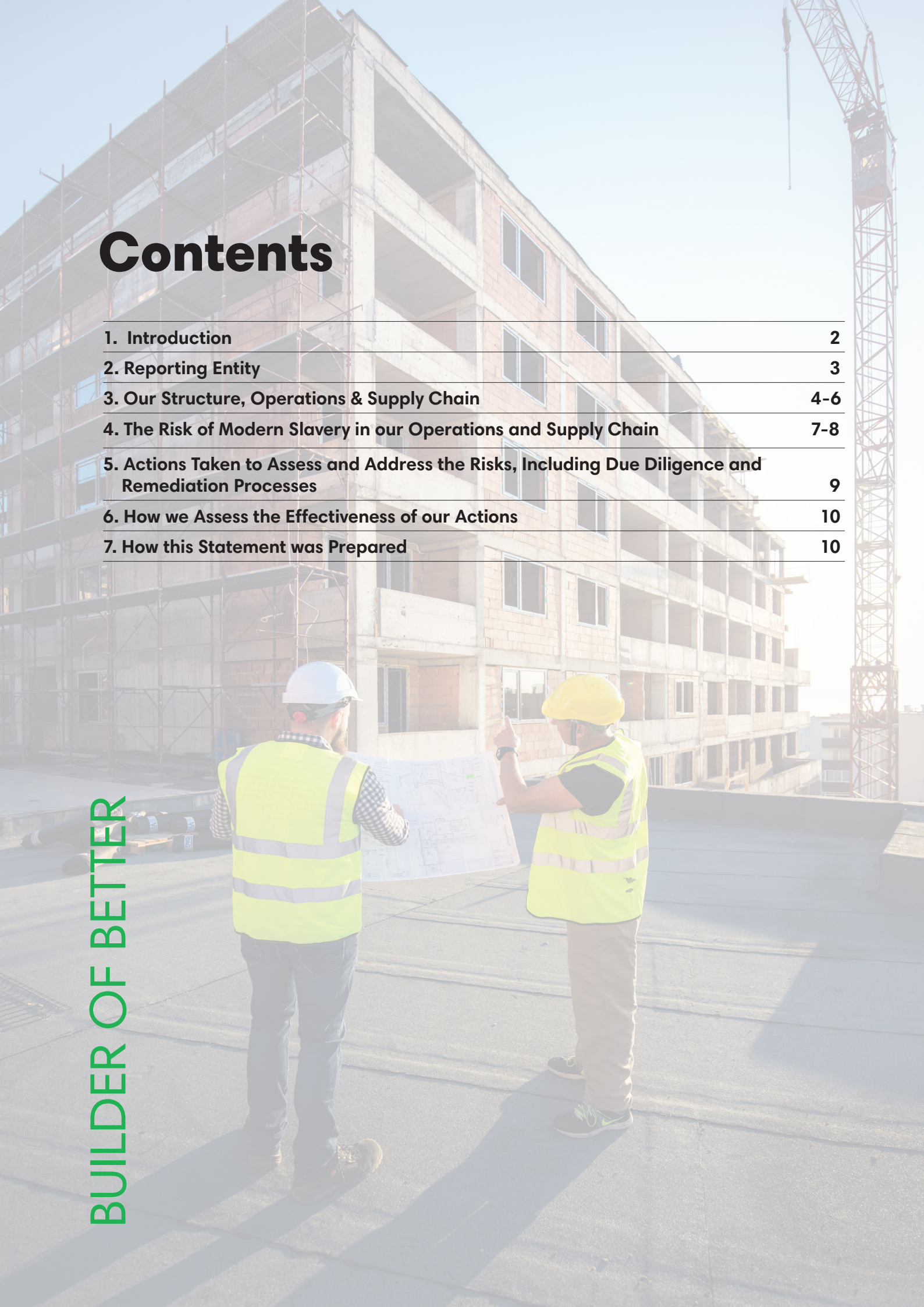
**Modern Slavery
Statement
2023/2024**

BUILDER OF BETTER

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BUILDER OF BETTER





1. Introduction

Whilst this document specifically addresses the mandatory reporting requirements of modern slavery within Australia, Kennett takes a broader human rights based approach, considering the full spectrum of our risks and impacts, with a particular focus on the construction industry. This approach is grounded in the human rights due diligence framework outlined in the 2011 United Nations Guiding Principles on Business and Human Rights (UNGP's), which requires businesses to address their adverse human rights impacts by taking risk mitigation measures and remediation of harm where required.

In considering modern slavery from this overarching perspective, we both strengthen our modern slavery response and enable early identification and the ability to take immediate action in the event that any human rights violations are uncovered within our operations.

Globally human rights frameworks aim to protect the inherent dignity and freedom of every individual, enshrining principles like freedom from exploitation and coercion. Human rights are a set of principles that include;

- The right to enjoy just and favourable conditions of work
- Freedom from discrimination and harassment
- Freedom from discrimination on the basis of protected attributes
- The right to physical and mental health
- The right to safety
- The right to decent work
- Freedom of assembly and association
- The right to a clean, healthy and sustainable environment
- Freedom from modern slavery

The construction industry can be considered high risk for human rights infringements for the following reasons:

- The high demand for low skilled labour force
- Poor visibility over long and complex supply chains
- Subcontractors may rely on a migrant workforce
- Low barriers of entry for labour hire providers
- Potential for unfair or unsafe working conditions
- Low tier suppliers may be operating in high risk geographies

Modern slavery can take many forms including involuntary slavery, forced labour, debt bondage and human trafficking. All forms of slavery involve the deprivation of freedoms and exploitation for personal or commercial gain.

2. Reporting entity

This statement is prepared by Kennett Pty Ltd (ABN 80 007 534 787) for the reporting period ending 30th June 2024, and is pursuant to the Modern Slavery Act 2018 (Cth.). This statement sets out the actions taken to assess and address human rights infringements, including but not limited to modern slavery in our business and supply chain for the reporting period.

Kennett is a privately held commercial construction company.

Our registered office and principal place of business is:

Adelaide
40 East Street
Brompton SA 5007

PO Box 131
North Adelaide SA 5006
(08) 8245 1822

3. Our structure, operations & supply chain

Our Structure

Kennett is a privately owned, 4th generation Australian based commercial construction company, first established in 1914. Head office is in Adelaide, South Australia and we have two additional registered offices; Mt Gambier, SA and in Melbourne, Victoria.

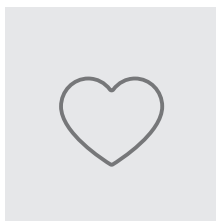
Kennett is governed by an Advisory Board, including 2 Directors and an Executive Management team who meet monthly to review company policy and oversee business governance.

During the reporting period Kennett directly employed 95 people across our three office locations in South Australia and Victoria. An estimated 400 suppliers provided goods and services to the business during the reporting period.

Our Values

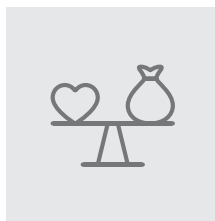
As a fourth-generation family owned and operated company, family values are ingrained in everything we do – how we plan, how we build, how we partner with our clients and how we care about our staff.

We support the creation of a diverse and inclusive community where individuals are respected and valued. We aim to operate in an ethical, sustainable and safe manner, committed to leaving our natural environment in a better state and adding value to the communities in which we work. We also support a range of causes which help those communities and organisations fulfil their goals and objectives. Community has been key to our success and so we are proud to give in return.



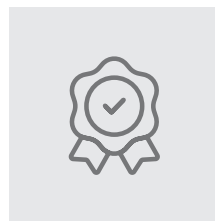
Passionate

Our love for what we do inspires us to deliver better in every way.



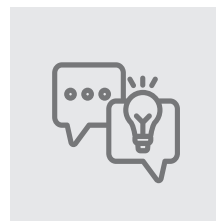
Authentic

We do the right thing because it's the right thing to do.



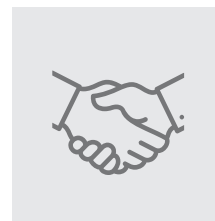
Quality

We never compromise on quality.



Dynamic

Experience drives our thirst for innovation.



Partnership

We genuinely work with you and for you.

Our Operations

Kennett provides design and construction services in South Australia and Victoria across multiple sectors including;



Education



Recreation & Sport



Aged Care & Health



Commercial



Industrial



Retail & Automotive



Multi-level Residential

During the reporting period, Kennett have delivered a number of key projects;



- Nazareth Catholic College, SA
Winner 2024 MBA(SA) Commercial/ Industrial Building \$50-\$100m



- Mercedes College, SA



- Enfield Memorial, SA



- Driscolls National Head Office, VIC



- CCH Summerhill, Uraidla, SA
Winner 2024 MBA(SA) Retirement Living/Aged Care



- Wolf Blass "The Man" Event Centre, Morphettville Racecourse, SA
Winner 2024 MBA(SA) Commercial Refurbishment/Redevelopment over \$5m

Kennett were awarded the Master Commercial Builder of the Year in 2024 by the Masters Builders Association (SA).

Accreditations





Our Supply Chain

During the reporting period Kennett's suppliers can be categorised into two distinct groups; direct procurement, reflecting those suppliers that are critical to the core construction business, and corporate procurement which covers those goods and services that are supplementary to the core business.

Direct Procurement

- Sub-contractors and labour
- Raw material suppliers eg. bricks, steel, aluminium, concrete, paint, piping etc.
- Manufactured products eg. formwork, doors and frames, electrical products, cladding and roofing, carpet and flooring, joinery etc.
- Design and consultancy services eg. structural engineers, architects

Corporate Procurement

- Building services eg. security, cleaning,
- Equipment eg. site sheds, rubbish bins, vehicle fleet
- Professional services eg. accountants, IT support
- Office consumables, IT equipment and furniture
- Travel
- Merchandising and branded promotional items

Kennett is committed to supporting other Australian based businesses who are using local content on our projects. Our highest spend categories during the reporting period are contractor partners, professional services and staffing costs.

Kennett aims to ensure we maximise the opportunities for local manufacturers, distributors and installers in the supply chain applicable to our core business. We use long lead times and early engagement with suppliers which results in better outcomes for all stakeholders. Our subcontracted labour force is all based in Australia and our terms and conditions within these contracts explicitly require suppliers to uphold high standards of safety and fairness in their workplaces. These requirements cover aspects such as providing adequate training, maintaining safe work conditions, ensuring fair wages and prohibiting discrimination and harassment.

4. Risks of modern slavery practices in our operations and supply chains

The construction industry can be considered high risk for human rights infringements as a result of four key factors: vulnerable populations, high risk categories, high risk business models and high risk geographies. These can be categorised as follows;

Vulnerable Populations

- The high demand for a low skilled labour force.
- Potential for unfair or unsafe working conditions.
- Subcontractors may rely on a migrant workforce.

High Risk Categories

- Raw materials often mined/sourced from regions with poor human rights records. eg. bricks, tiles, cement, granite, rubber and timber.
- Sourcing and use of manufactured products eg HVAC and electrical products.
- Procurement of branded merchandise via a multi layered supply chain, often originating from regions with poor human rights records.

High Risk Business Models

- Low barriers of entry for labour hire providers.
- Poor visibility over long and complex supply chains leading to limited visibility and control over recruitment and employment practices of suppliers and subcontractors.
- The structure of tendering and procurement processes which may place downward pressure on supply chains to meet project milestones. This may lead to labour exploitation as purchasing decisions are increasingly made on criteria such a price and availability.

High Risk Geographies

- Low tier suppliers may be operating in high risk geographies with less regulated environments, low levels of education, awareness and potentially higher levels of corruption.

Risks in Our Operations

Kennett consider our human rights risk to be low across our operations due to the following reasons:

- All staff are based in Australia and all projects within the reporting period were delivered in either South Australia or Victoria.
- Human rights risks have been acknowledged on our Issues, Risks and Opportunities Register.
- The executive leadership meet monthly to discuss business risk which ensures the visibility of modern slavery risk within our operations.



- We have a number of company wide policies and standards relating to human rights which are updated on a schedule that varies from 1 to 3 years. These include;
 - Corporate Social Responsibility Policy
 - Family and Domestic Violence Policy
 - Site Anti Bullying Posters
 - Site Sexual Harassment Posters
 - Workplace Bullying and Harassment Policy
 - Freedom of Association Policy
 - Migration Compliance Policy
 - Equal Opportunity Policy
 - Employee Health and Wellbeing Policy
 - Leave Policy
 - Whistleblowing Policy
 - Inclusion & Diversity Policy
 - Disability Engagement Policy
 - Indigenous Engagement Policy
 - Right to Disconnect Policy
 - Quality Policy A4
 - Chain of Responsibility
 - Health Safety Policy A4
 - Policy Statement - Environmental A4
 - Sustainability Policy and Carbon Management Plan
- Our employee induction and onboarding process ensures new staff are aware of and have read the above policies and standards
- All employees have access to an EAP (Employee Assistance Programme)
- Kennett's proprietary Dashboard system controls all policies, procedures and forms which reinforces our commitment to quality and accuracy

Risks in Our Supply Chain

Kennett's labour engagement and management policies and practices are structured in accordance with the relevant Australian laws, however we acknowledge the greater risk of contributing to modern slavery lies in the operations of the supply chains of our subcontractors and external suppliers. In these instances the risk is most likely to arise from;

- Materials sourced from overseas
- Local trades where unskilled or semi-skilled labour is sourced

The subcontractor screening which is outlined as part of the procurement process above, means we consider this risk to be minimised as far as possible.

Within our operations and supply chain we consider our risk profile to be classified as medium in situations where our local suppliers may in turn be engaging with suppliers from high risk geographies to source manufactured product such as cement and tiles. We acknowledge that we have limited visibility over the degree of scrutiny applied by our subcontractors to ensure no human rights infringements are occurring within their own supply chains.

5. Actions taken to assess and address these risks, including due diligence and remediation processes

- Kennett's policy is to identify and manage the environmental, social, ethical and economical impacts within our supply chain, through sustainable procurement. Most of our suppliers are located in Australia, and we have a strong emphasis on using local content for our projects.
- We have ensured subcontractor compliance by updating our Subcontractor Terms & Conditions to specifically address modern slavery ensuring they take reasonable steps to identify and prevent the occurrence of modern slavery within their organisation or supply chain.
- During the reporting period Kennett partnered with Procure Pro to streamline our procurement processes, empowering us to streamline subcontractor engagement, increase efficiencies, improve quality and enhance governance.
- Kennett's policy is to identify and manage the environmental, social, ethical and economical impacts within our supply chain, through sustainable procurement.
- Project site team safety is consolidated and optimised via the Hammertech platform.
- All staff have a responsibility to prevent or if identified, report and human rights violations within Kennett's supply chains or operations.
- Our approach to managing our environmental responsibilities includes;
 - minimising all types of pollution
 - protecting flora and fauna
 - recycling and re-use of building waste
 - managing site contamination
 - monitoring environmental controls
- Provision of a whistleblower policy to provide a pathway toward remediation.
- Onsite project toolbox meetings held every 28 days with a standing agenda covering human rights infringements such as sexual harassment and bullying, as well as regular discussion around suicide prevention. This is an open forum for any concerns to be address at a group level if desired by workers on site.

Actions going forward

In the next reporting period, Kennett undertake to:

- Facilitate training for all relevant staff on human rights and modern slavery risks in Australia.
- Embed the policies in our systems and ensure regular updates are centrally monitored.
- Update company policies to reflect an overarching human rights approach.
- Undertake a supply chain review for corporate procurement to ensure products and services come from reputable places with fair working conditions.
- Build on our environmental performance by becoming GBCA Greenstar accredited in at least one project.
- Demonstrate leadership and innovation in sustainable building practices.



6. How we assess the effectiveness of our actions

Kennett's assessment of the effectiveness of our actions to address human rights infringements is a process of continuous improvement as we increase our awareness of the key risks our business operations and supply chain may expose.

Specifically, we will;

- Commit to reviewing any whistleblower reports if and when they arise.
- Conduct annual Health, Safety, Environment and Quality (HSEQ) reviews with Senior Management and Executive team.

7. How this statement was prepared

This statement was prepared in consultation with key stakeholders and members of the Executive Management team.

It was approved by the Directors and Executive in their capacity as principal governing body of Kennett Pty Ltd on 18/10/24

This statement is signed by Scott Kennett (Director) and Anthony Carbone (General Manager SA) of Kennett Pty Ltd on 18/10/24

Scott Kennett
Director
Kennett Pty Ltd

Anthony Carbone
General Manager (SA)
Kennett Pty Ltd

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