



Modern Slavery Statement
2021

About Kelsian Group

Kelsian Group Limited ACN 109 078 257 (Kelsian Group) (formerly known as SeaLink Travel Group Limited) is listed on the Australian Securities Exchange (ASX) and is Australia's largest land and marine tourism and public transport service provider, with established international operations in London and Singapore. Kelsian Group provides innovative and efficient transport solutions that link people and communities with places and experiences. With a genuine care for our customers, people and the environment, we believe in delivering safe, convenient and sustainable transport that keeps people connected.

Kelsian Group is one of Australia's most experienced and diverse multi-modal transport businesses, boasting performance-driven capabilities across ferry, bus and light rail.

Kelsian Group is made up of SeaLink Australian Marine and Tourism operations and facilities, and two divisions of the Transit Systems Group, operating domestic and international public bus and light-rail transport contracts. Kelsian Group has operations in seven Australian states and territories, as well as Singapore and London. In addition, in July 2021 Kelsian Group acquired Go West Tours, who provide bus and charter services in regional Western Australia primarily to the resource sector.

Kelsian Group is a business with a focus on innovation and is leading the way in the area of sustainable transport and tourism experiences, with the introduction of electric buses in New South Wales, London and Singapore, demand responsive transport services in Sydney, Melbourne and Adelaide and is part of the world's first hydrogen bus consortium, the H2OzBus Project.

Kelsian Group, through its Transit Systems division, has also become the first operator in Australia to purchase hydrogen fuel cell buses to be deployed in a public transport environment, with the buses expected to arrive in early 2022. Kelsian Group also operates an ecotourism resort on the world heritage listed, Fraser Island and provides eco-experiences and tours in Queensland and South Australia.

Headquartered in Adelaide since 1989, the business has experienced a remarkable period of transformational growth in recent years. Kelsian Group has emerged as a leader in both public transport and tourism, bringing together Australia's most dynamic travel company and global transport leader in public transport.



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Overview

Kelsian Group supports the Commonwealth Government's commitment to combating modern slavery in global supply chains and the introduction of modern slavery reporting pursuant to the Commonwealth Modern Slavery Act 2018 (the Act).

The statement sets out the Kelsian Group report for 2021. This statement outlines the Kelsian Group approach to managing risks of modern slavery and its anti-modern slavery practices in compliance with its reporting obligations under the Act. The Act requires entities who are operating or carrying on business in Australia and which have a consolidated revenue of \$100 million or greater, to report annually on their actions to assess and address the risks of modern slavery in its operations and supply chains.

The term 'Modern Slavery', as defined by the Act, defines modern slavery as including eight types of serious exploitation and includes trafficking in persons, slavery, servitude, forced labour, debt bondage, deceptive recruitment, forced marriage, and the worst forms of child labour: situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Kelsian Group appreciates that it has both a moral and legal responsibility to ensure, to the best of its knowledge, that modern slavery practices do not exist within its operations and to maintain a responsible underpinning supply chain. Kelsian Group finds it wholly unacceptable that in 2016 there were an estimated 24.9 million people worldwide who were victims of forced labour, 16 million of which were exploited in the private sector through domestic work, construction or agriculture as reported by the International Labour Organisation.

The Board of Kelsian Group unequivocally continues to condemn modern slavery in all its forms and our expectation continues to be that all our employees, suppliers, subcontractors and any other person or entity affiliated with our business share this view.

REPORTING ENTITY

Kelsian Group Limited is the ultimate holding company and a reporting entity for purposes of this Modern Slavery Statement. Kelsian Group consists of numerous subsidiary entities both nationally and internationally.

Kelsian Group Limited is the new company name for SeaLink Travel Group Limited. During the reporting period 1 July 2020 – 30 June 2021, Kelsian Group Limited was known as SeaLink Travel Group Limited. Any references to SeaLink Travel Group Limited in both this statement and its predecessor refer to Kelsian Group Limited.

The following Kelsian Group Limited wholly owned subsidiary entities are also reporting entities for purposes of the Act and together with Kelsian Group Limited have prepared this joint statement:

- Transit Systems Pty Ltd
- Transit Systems West Pty Ltd
- Torrens Transit Pty Ltd
- Swan Transit Pty Ltd

This statement has been prepared and submitted on behalf of Kelsian Group Limited and the above entities in respect of the operations of the Kelsian Group.

For detail of the entities part of Kelsian Group, please refer to our [2020 - 2021 Annual Report](#).



Our Business Structure & Operations

Kelsian Group is a public company (ASX: KLS), listed on the Australian Securities Exchange (ASX). Since inception, Kelsian Group has delivered transport services, initially through a ferry service between Kangaroo Island and the mainland in South Australia.

Kelsian Group is now a leading multi-modal integrated transport operator, delivering essential services through public transport operation contracts on behalf of governments globally and also offers brilliant holiday and tourism experiences to some of Australia's most desired and idyllic locations.

As of 30 June 2021, our business operations and divisions are structured as follows:



Transit Systems, our **Australian Public Transport Division**, provides public transport services including bus and light rail operation, on behalf of governments in Australia.



Tower Transit, our **International Bus Division**, provides bus public transport services under contract to government transport agencies in Singapore and London.



SeaLink, our **Marine & Tourism Division**, provides passenger and transport ferry services, tourism experiences and resort facilities within Australia.



OUR GLOBAL OPERATIONS

Through 2020 - 21 SeaLink's global operations continued to grow and diversify throughout the world. Here's a snapshot of the numbers.



300 Million
Passengers



8800
Staff



61
Depots/Ports



35
Contracts



3600
Buses



80
Ferries



24
Trams



12
Cities



14
Islands

LONDON



SINGAPORE



AUSTRALIA



Operations as at June 2021

Our Supply Chain

Kelsian Group aims to partner with suppliers and vendors who share our ethical values regarding modern slavery, anti-corruption, personal data protection and human rights more broadly. Kelsian Group will not knowingly contract with or purchase from companies who are in violation of human rights practices and we understand that external providers who Kelsian Group interact with may reflect on our organisation.

To deliver our extensive range of services, Kelsian Group partners with a large, dynamic network of suppliers and subcontractors. Our supply chain is diverse in its product and service offerings with suppliers differing in entity size from large corporates to small and medium local businesses.

Our supply chain consists of both direct and indirect suppliers. As an Australian based business and through contractual commitments to our customers and clients, we make local Australian sourcing a priority, when possible, within our Australian operations. We aim to ensure that prior to contracting or entering into supply arrangements with another entity, the entity is aware that Kelsian Group expects they act honestly, lawfully and ethically.

SUPPLY CHAIN CATEGORIES

Kelsian Group supply chain is broadly reflected into the categories noted below:

General Goods and Services	Operational purposes e.g. fuel, external cleaning, bus/vessel parts, uniforms, telco/IT services etc.
Maintenance Services	Services required for works on assets and property e.g. specialised repairs for vehicles/vessels, qualified tradespersons etc.
Capital Purchases	Purchase of assets e.g. purchase of vehicles/vessels, property etc.
Retail Goods	Products purchased for resale purposes e.g. food and beverage, merchandise etc
Professional Services	To support business operations/programs e.g. financial, advisory, technical and audit services etc.
Indirect Suppliers	Suppliers who do not have a direct trading relationship with Kelsian Group but are part of a recognised Kelsian Group supplier's underlying supply chain.

DIVISIONAL SUPPLY CHAIN OVERVIEW

The below provides an overview of Kelsian Group's supply chain activity by division:

Australian Bus	<ul style="list-style-type: none"> Goods and services i.e. fuel, oils and lubricants, spare parts, tyres, uniforms, cleaning services, telco/ IT services, utility services Maintenance services i.e. crash repairs, chassis repairs, engine repairs, windscreen repairs, general trades person works
International Bus	<ul style="list-style-type: none"> Goods and services i.e. fuel, oils and lubricants, spare parts, tyres, uniforms, cleaning services, telco/ IT services, utility services Maintenance services i.e. crash repairs, chassis repairs, engine repairs, windscreen repairs, general trades person works
Marine & Tourism	<ul style="list-style-type: none"> Goods and services i.e. fuel, spare parts, uniforms, cleaning services, telco/IT services, utility services Maintenance services i.e. vessel repairs, engine repairs, blasting and painting, general trades person works Retail goods i.e. food and beverage, company merchandise

Risk of Modern Slavery in Operations & Supply Chain

Kelsian Group understands that combating modern slavery is a significant issue within operations and supply chains globally and is not limited in entirety to a specific location or industry. Kelsian Group continues to be committed to complying with the Commonwealth Government legislation to increase transparency and combat this confronting problem.

As a global operation supported by a considerable supply chain, we appreciate the potential that modern slavery could be linked to our business directly, indirectly or through association. Kelsian Group acknowledges that, although it is more likely modern slavery practices may occur in geographic locations with a lesser reputation for supporting human rights, it is our responsibility to continue to communicate and reinforce to our employees and supply partners to operate ethically.

OPERATIONAL RISK

As a business that operates both domestically and internationally, Kelsian Group employees are based in Australia, Singapore, and the United Kingdom. Whilst Kelsian Group operates on a global stage, the largest proportion of our operations are conducted within Australia, where most of our employees are located. From a geographical perspective, given the controls, legislation and societal expectations in Australia this lessens the risk to most of our workforce from being subjected to modern slavery labour practices.

Likewise, our international presence and operations based in Singapore and London fall in the lower geographical country risk category as these locations are likely not be considered as high-risk geographies with vulnerable populations. However, we continue to monitor our businesses to ensure all operations are undertaken in safe environments and our workforce is treated fairly under the relevant legislation and/or enterprise agreements.

Given the risks associated with modern slavery occurring within the operational aspects of our business, Kelsian Group continues to progressively communicate to all employees, contractors and those affiliated with our organisation our expectations and their obligations, where possible.

SUPPLY CHAIN RISK

Our business collaborates with a significant number of supply partners who contribute to our underpinning supply chain, which is extensive and diverse. Kelsian Group considers the potential risk of modern slavery practices occurring within our supply chain to be materially more possible than directly within our operations.

During the reporting period, we have highlighted areas of our supply chain that may be more susceptible or have greater exposure to the risk of modern slavery being present. As a result, Kelsian Group sought more assurance from suppliers in the areas identified as high risk to ensure goods and services supplied to Kelsian Group are done so ethically and risks of modern slavery are managed appropriately.

It is Kelsian Group's view that our direct suppliers, especially those whom we have active contractual relationships with, present a lesser risk in terms of engaging in modern slavery behaviour in comparison to that of our indirect suppliers. This is due to those suppliers being engaged by Kelsian Group through more robust and diligent processes e.g. tender processes, contractual conditions, contract management overview and reporting mechanisms.

Kelsian Group continues to engage with our supply chain to review our suppliers (specifically those considered 'higher risk') to re-affirm their commitment to and compliance with the Commonwealth Modern Slavery Act 2018.

Our Actions

How we mitigate and address the risk of modern slavery.

As noted in our previous report, we are committed to continually enhancing our processes to identify, assess and address potential modern slavery risks within our businesses at both a corporate and local level, where possible. We understand that the abolishment of modern slavery activity is an ongoing commitment. We intend to take a risk-based approach and refine our governance arrangements, policies and procedures, and supply chain documentation to improve our position as an organisation that opposes modern slavery in all its forms.

OUR VALUES

At Kelsian Group, we believe our core values, known as our 'COMPASS' Values embody the culture of our business operations both commercially and ethically. It is our goal, through the adoption of our COMPASS Values, to create an environment where individuals fundamentally behave and conduct activity on behalf of Kelsian Group, in a manner aligned to similar moral principles with the greatest standard of integrity.

Our COMPASS Values set the tone for our people and the way we operate:

CUSTOMER FOCUSED

We focus on delivering a brilliant experience for every customer

ONE TEAM

We are one united team. We support, respect and value each other

MOTIVATED

We embrace each day with energy, enthusiasm, and a can-do attitude

PROFESSIONAL

We take responsibility to 'do the right thing' with honesty and integrity

AUTHENTIC

We are 'real' and genuinely care about what we do

SUCCESSFUL

We are easy to do business with and we deliver results

SAFETY FOCUSED

We make safety a priority in everything we do

During the reporting period, COMPASS Values have been adopted by Transit Systems Group (Australia) and Tower Transit Group (UK) and now align with SeaLink Marine & Tourism. We recognise that some business units have legacy values statements in place and express their values differently. We ensure that when this occurs, the sentiment of the values statements are strongly aligned to COMPASS Values. For example, our Singapore operations adopt CITIES Values (Care, Integrity, Teamwork, Innovation, Excellence, Safety). All employees and contractors are expected to uphold COMPASS Values.

GROUP RISK MANAGEMENT

During the FY21 reporting period, progress was made in updating our business risk registers across our expanded Group. These risk management reviews and updated risk assessments included further assessment of the risks of modern slavery within our operations and supply chain.



Our COMPASS Values set the tone for our people and the way we operate.



Our policies and procedures help implement our commitment to ethics, wellbeing, safety, and demonstrate the protections afforded to our team members.



Policies & Standards

Kelsian Group currently has a suite of established policies and procedures that outline our expectations of employees and contractors who undertake tasks on behalf of the Group. Our policies and procedures help implement our commitment to ethics, wellbeing, safety, and demonstrate the protections afforded to our team members.

During the reporting period we continue to review, improve and enhance our policies to ensure that they are appropriate for our operations and aspirations.

The following key Group policies and procedures, approved under the governance framework of Kelsian Group, influence our behaviour towards Modern Slavery:

CODE OF CONDUCT

Kelsian Group is committed to not only complying with its legal obligations, but also to acting ethically and responsibly. The Code of Conduct sets out the requirements that all Kelsian employees are required to meet when carrying out their roles or representing Kelsian Group.

DELEGATIONS OF AUTHORITY

Kelsian Group has a Delegation of Authority (DoA) directive which is applicable to all group operations. The DoA ensures that relevant senior management have oversight of key decisions, undertakings, and expenditure within the Group's portfolio. The DoA provides comfort that our actions as an organisation are both tangibly auditable and appropriate consultation and management approval is obtained when conducting our activities.

RESPECTFUL WORKPLACE BEHAVIOUR POLICIES

Kelsian Group is committed to providing a professional work environment, free from discrimination, victimisation and workplace harassment, including workplace bullying and sexual harassment. Policies and processes are in place across our Group to support this commitment for our employees.

WHISTLEBLOWER PROTECTION POLICY

Kelsian Group is committed to acting with fairness, honesty and integrity. This policy encourages people to speak up if they become aware of wrongdoing and help deter wrongdoing; explains how to speak up and what protections a discloser will receive; outlines how Kelsian Group will respond to reports made under this policy; and promotes a "safe to speak up" culture in which everyone feels protected and supported. This policy is intended to supplement, and not limit in any way, the provisions of the Corporations Act in relation to whistleblowing where they apply.

ANTI-BRIBERY AND CORRUPTION POLICY

Kelsian Group is committed to operating with the highest standards of honesty, integrity, fairness and professionalism in its operations and dealings with shareholders, employees, governments, customers, suppliers and communities. Bribery and corruption are unacceptable in any form and Kelsian Group requires all employees to ensure that any business dealings in which they are involved in, remain free from real or perceived bribery or corruption. The purpose of our Anti-Bribery and Corruption Policy is to clearly describe the commitment to ethical business practices and standards all employees are expected to adhere to by observing and upholding the prohibition of bribery and improper conduct.

GROUP PROCUREMENT POLICY

Kelsian Group Procurement Policy outlines how we manage our purchasing and procurement activities to enable efficient commercial arrangements that aligns with Kelsian Group strategies and drivers. One of the main objectives of this policy is to ensure probity and accountability is reflected through ethical procurement/purchasing processes, including fair treatment of suppliers. This policy references the requirement to be diligent in regard to modern slavery practices whilst engaging with external parties.

DIVERSITY AND EQUITY POLICY

Kelsian Group recognises that a talented and diverse workforce is a key competitive advantage, and our success reflects the quality and skills of our people. Kelsian Group benefits by bringing together high-quality people of diverse backgrounds. The Kelsian Group Board undertakes an annual assessment of performance against diversity objectives. This policy applies to all Kelsian employees, contractors, directors, and officers at all Kelsian Group locations.

HEALTH SAFETY ENVIRONMENT AND QUALITY POLICY

Kelsian Group is committed to the health, safety and welfare of our employees, contractors, visitors and customers. We care for the environment and are committed to preserving the natural environment through the efficient use of resources, minimising waste and reducing environmental impact, whilst promoting a culture of sustainability. We are also committed to high quality of service that provides an efficient, reliable and safe experience to our customers.

Procurement Visibility

Kelsian Group has implemented a dedicated centralised procurement function to support the local procurement aspects of its subsidiaries that operate within a decentralised model.

Through the integration of a procurement support function to our business, this has resulted in national supply agreements being managed more effectively with relevant corporate oversight and point of escalation. Tender processes for significant purchases or high-risk goods and services have increased in maturity over the period. In relation to possible modern slavery activity, Kelsian Group now requires as a standard that potential suppliers state their commitment and compliance with the Commonwealth Modern Slavery Act 2018, when bidding for goods and services through tender process.

Below is an excerpt of a standard question Kelsian Group asks of potential suppliers in its Request for Proposal template issued to the market.

The Client (Kelsian Group) requires that you provide a statement to the best of your knowledge that in the event your Proposal is accepted the underlying supply chain utilised in the manufacture, transportation and delivery of goods and services does not contain elements of modern slavery. Please also outline any mechanisms your organisation has in place to mitigate these risks.

As stated previously, Kelsian Group is aware of the potential of modern slavery to be present in its underlying supply chain and is committed to ensuring suppliers understand their obligations when trading with a Kelsian Group entity. It is our expectation that suppliers follow through on their commitments and to this end Kelsian Group will flag any potential issues, that may become apparent, through the contracted term.

INTERNATIONAL COMMITMENT

The Tower Transit Group Limited (Tower), part of the broader Kelsian Group, operates essential public bus transport services in the United Kingdom and Singapore. Tower operates services on behalf of Transport for London (UK) and the Land Transport Authority (Singapore).

Under the UK Modern Slavery Act 2015 legislation, Tower has for some years assessed risks of modern slavery in its supply chain and articulated its approach to managing risks of modern slavery practices in both its operations and supply chain in an annual statement available on the Tower website. Tower is committed to ethical dealings and aims to maintain the highest standard of business conduct with its customers, suppliers, employees, and the communities wherever they operate around the world.

Tower Transit has stated its desire that each and every one of its suppliers conduct business in a lawful and ethical manner, including business practices that prevent slavery and human trafficking in its own supply chain. Tower selects suppliers and business partners carefully. Should any selected supplier not attain the standards that Tower expects, Tower will not do business with them.



To read Tower's publicly available modern slavery statement, [CLICK HERE](#) or scan the QR code.

Tower Transit is committed to ethical dealings and aims to maintain the highest standard of business conduct with its customers, suppliers, employees, and the communities wherever they operate around the world.



FY21 Progress

During the reporting period 1 July 2020 – 30 June 2021, Kelsian Group conducted a number of activities and actions to increase visibility and assurance that our exposure within our operations and supply chains is at a reduced risk. These activities included:

- **Bringing together key members of the Kelsian Group team to participate in an open anti-modern slavery forum.** This provided education to our employees on the Group's anti-modern slavery commitments, reinforced the requirement of being vigilant and encouraged discussions on key risks and potential mitigations.
- **Through our learning and development team, Kelsian Group assigned relevant employees with mandatory education and learning material, highlighting the requirements of Commonwealth Modern Slavery Act 2018.** This included a formal declaration from all employees that they had read and acknowledged the Kelsian Group Modern Slavery Statement and understood our position on modern slavery within our operations and supply chain.
- **Kelsian Group continued to agree terms and conditions with suppliers that included references and appropriate contractual conditions that outline our position on modern slavery and the expectations of our suppliers.**
- **The introduction and realignment of relevant Kelsian Group policies and procedures that influence our behaviour towards ethics and social governance.** These policies ultimately reflect and set out our expectations of employees and any external parties who wish to collaborate with us.
- **Seeking appropriate assurance from suppliers considered to be in a high risk category.** Kelsian Group has acknowledged the Xinjiang region in northwest China has been an area of international concern with regards to various allegations of forced labour and human rights violations more broadly, directed towards the Uighur population who resides in the region.

As a result, we have confirmed with our main bus manufacturers and OEM spare parts providers that the appropriate frameworks/controls are in place and that items Kelsian Group procures do not come from this region.

Given the Xinjiang region is renowned for its export of cotton from its vast cotton fields and to prevent Kelsian Group from contributing to potential human rights infringements unwittingly through its supply chain, we sought assurance from our contracted uniform supplier (based in Australia) by way of its internal ethical sourcing and corporate social responsibility framework. In this area, we have also sought assurance directly from both the factory and weaving mills based in China to confirm they are not affiliated with the cotton industry in Xinjiang.

Consultation with Kelsian Entities

During the reporting period to 30 June 2021, representatives of entities of Kelsian Group, both nationally and globally, participated in a forum to discuss potential risks of modern slavery within our business. This forum was attended by representatives of all divisions with appropriate employees nominated by the Group's Executive. Representation included employees from Business Operations, Fleet Management, IT, Legal, Human Resources and Procurement backgrounds.

During FY2021 Kelsian Group finalised its large integration project following its acquisition of the Transit Systems Group in 2020. That broader project involved consultation on a variety of areas as part of planning for integration of our divisions. After formulating our inaugural Kelsian Modern Slavery Statement, this provided a platform to engage with the broader business units within the Group during the 2021 reporting period. Kelsian Group has considered the modern slavery risks through engagement with its divisions during the FY2021 reporting period, especially those risks associated with Transit Systems Group.

It is our intention to continue to workshop modern slavery risks with a larger cross-functional team across our Group moving forward. This should continue to increase awareness and understanding of the risks and identify potential solutions/mitigations as to how our Group continues to monitor the risks of modern slavery entering our operations and/or underlying supply chain.

Kelsian Group currently has an established internal Board Audit and Risk Committee and a Group Executive Risk Committee as part of its governance arrangements. It is intended that both these Committees will retain oversight of our modern slavery, human rights, and anti-corruption risks, as we assess the potential for these types of behaviours occurring in our operations and supply chain.

We are committed to recognising, acknowledging and understanding Aboriginal and Torres Strait Islander peoples and cultures.



Additional Information

We understand as a business that we must further our work to embrace community and sustainability practices across our business, in both our operations and supply chain. We are proud of the recent work we have commenced and completed to bring a more sustainable and community focused outlook to the way Kelsian Group operates.

These initiatives include:

RECONCILIATION

Kelsian Group reaffirmed our commitment to Aboriginal and Torres Strait Islander people, cultures, and communities with a new Reconciliation Action Plan (RAP) this year. We celebrate the vast diversity of our network. Each employee brings a fusion of skills and contributions to our operations and services. It is through this diversity that we can embrace and incorporate recognition, acknowledgement and understanding of Aboriginal and Torres Strait Islander peoples and cultures.

Within the reporting period, our Sydney bus operation, Transit Systems NSW, also launched a RAP. In addition our marine business River City Ferries launched its own RAP in Brisbane to resonate with its local operation. Kelsian Group has established a RAP Working Group to oversee, facilitate and implement the commitments outlined in the Group RAP.

COMMUNITY

In every community where we operate, Kelsian Group has a bespoke local content plan to capture the needs of the community and empower our teams on the ground to take pride in the outcomes. Support for local communities primarily takes the shape of charitable donations, sponsorship support and the provision of in-kind services. Kelsian Group is highly aware of our responsibility to local residents and local services. In the reporting period the majority of Kelsian Group supply chain expenditure occurred within the communities that are serviced by us.

ZERO EMISSIONS

Sustainability is an ongoing focus for us at Kelsian Group and we are the leader in delivering zero emission bus solutions to Australian public transport networks. In December 2020, we placed Australia's largest order for battery electric buses (BEB) after a successful two-year bus pilot in Region 6 in Sydney. In June 2021, 10 battery electric buses were placed into service, and we are working closely with TfNSW on a proposal to introduce a fleet of a further 40 BEB's into Sydney.

In May 2021, and in an Australian first, we ordered two hydrogen fuel cell buses to service public transport contracts in Australia. This purchase follows our extensive trials in operating a fleet of hydrogen buses in London as part of the Transport for London led Clean Hydrogen in European Cities (CHIC) and 3Emotion projects. Over the next year, we will be exploring and trialling this technology to better understand how it adapts to Australian conditions.

In addition, our London operation continued to diversify its fleet of buses, investing in 37 new electric double decker buses to support key routes around London.

Although the above-mentioned activities do not directly address the risks associated to modern slavery, our view is that it continues to provide an insight into our commitment to creating a better, more inclusive, and prosperous community.

We are proud of the recent work we have commenced and completed to bring a more sustainable and community focused outlook to the way we operate.



Outlook

At Kelsian Group, a core value is to consistently act ethically, in line with the expectations of our Board and Shareholders. We believe that we have made progress and given more consideration to the potential risks of modern slavery occurring within our operations and/or supply chain since the introduction of the Commonwealth Modern Slavery Act 2018. We shall continue to manage our obligations appropriately and educate our employees and suppliers to refine our processes to manage the risk of modern slavery, where possible.

Moving ahead, in FY22, we intend to build on our current progress including:

INTERNALLY

- Continue to collaborate and consult with our broader team to educate and mitigate the risks of modern slavery developing within our business.
- Further roll out of our mandatory learning materials to operational level employees and assignment of this material to be part of the employee onboarding processes.
- Continually review our risk based approach to ensure appropriate human rights practices are in place to address potential infringements across all business divisions.
- Continue to ensure explicit references to risks and practices to combat modern slavery are built into relevant Kelsian Group policies and procedures.

EXTERNALLY

- Continue to engage with our key suppliers to ensure the alignment of values on modern slavery practices.
- Roll out of a comprehensive supplier survey inclusive of human rights commitments to be issued to our top tier suppliers and those considered to be in 'higher risk' industries – this has partially progressed within the FY21 reporting period.
- Continue to work towards a standard of progressively building in specific terms and conditions regarding anti-modern slavery into our supply contracts moving forward.
- Ensure relevant due diligence is undertaken on the purchase of goods from geographies considered 'higher-risk' and ensure any Australian agents of products manufactured from those geographies have relevant controls in place.

Approval

This Statement is made in accordance with the Modern Slavery Act 2018 (Cth). This Statement has been approved on 15 December 2021 by the Board of Kelsian Group Limited for itself and as the ultimate holding company of its wholly owned subsidiaries, Transit Systems Pty Ltd, Transit Systems West Pty Ltd, Swan Transit Pty Ltd and Torrens Transit Pty Ltd who are also reporting entities for purposes of the Act.



Jeffrey Ellison

Chair

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