



## Kordia Solutions Pty Ltd and Kordia Pty Ltd

### Modern Slavery Statement

This modern slavery statement is made by Kordia Group Limited (**Kordia Group**) on behalf of its 2 wholly owned subsidiaries incorporated in Australia, namely, Kordia Solutions Pty Ltd ACN 002 649 229 (**KSA**) and Kordia Pty Ltd ACN 062 953 940 (**KP**) (KSA and KP together are referred to as **Kordia**).

This statement has been prepared for the financial year ending 30 June 2021 (**Financial Year**).

Please note that KSA has been divested by Kordia Group as at 31 October 2021. For the next financial year ended 30 June 2022, KP's consolidated revenue will be well below the \$100 million threshold.

#### Commitment to combatting modern slavery

Kordia is committed to acting ethically and with integrity in all of Kordia's business dealings and relationships and to taking steps to implement and enforce effective systems and controls to limit the risk that modern slavery practices are taking place in Kordia's business or supply chains. Kordia is also committed to ensuring there is transparency in its own businesses and in Kordia's approach to tackling modern slavery in Kordia's supply chains.

#### Kordia's structure and operations

KSA and KP are wholly owned subsidiaries of Kordia Group Limited which is a limited liability company incorporated and domiciled in New Zealand. Kordia Group Limited is wholly owned by the New Zealand Crown and is a State-Owned Enterprise under the State-Owned Enterprises Act 1986 (N.Z.). It is a commercial entity and is not part of the New Zealand public service or State sector. Its shareholders are the New Zealand Minister of Finance and New Zealand Minister for State-Owned Enterprises on behalf of the Crown.

KSA and KP are the only Kordia corporate group members incorporated in Australia. Kordia's operations in Australia comprise:

- **Kordia Solutions:** KSA is an end to end service provider to the telecommunications industry with a customer base of mobile and fixed line carriers as well as Enterprise customers, Government and Defence. KSA has a wide service portfolio with an in-house Engineering and Design team, as well as a nation-wide field services capability with civil, rigging, installation, commissioning and maintenance services.

As noted above, KSA was divested by Kordia Group on 31 October 2021.

- **Maritime & Critical Communications:** KP operates an international maritime safety business which forms a key part of the operation providing safety of life at sea for Australia's navigation areas for which Australia is responsible under



international maritime laws. KP also operates coastal services for some States and supports port operations. This team is based in Canberra, ACT

- **Cyber Security:** KP provides cyber security consultancy services via a team based in Melbourne, VIC.

In the financial year Kordia employed more than 400 people throughout Australia. For the financial year, Kordia's head office was located at Level 9, 5 Rider Boulevard, Rhodes, NSW and then Level 4, 68 Waterloo Rd, Macquarie Park, NSW. Since the divestment of KSA on 31 October 2021, KP's head office and registered address is Level 2, 82 Northbourne Ave, Braddon, ACT, and the number of staff has reduced to less than 25.

More detail about Kordia is available from the Kordia website:

<https://www.kordia.com.au> and about Kordia Group at: <https://www.kordia.co.nz/>.

### Kordia's supply chains

Kordia's supply chains include the manufacture and importation into Australia of telecommunications materials and consumables. Kordia's supply chains include the provision of onsite construction works, professional drafting and design services and administration services, and the licensing of software, in connection with the provision of services to Kordia's customers. Kordia's supply chains also include the provision of office services and supplies, including for example, office stationery, IT support services, cleaning services and security services, for its offices located throughout Australia.

Kordia's direct suppliers are mainly located in Australia with some suppliers in China (principally KSA), Canada (KP only), India (KSA only) and the Philippines (KSA only), but with a reduction in activity compared to last year. The contract with the Indian-based outsource provider has ceased due to the underlying contract coming to an end, and there were no material level of equipment purchases from China. The Philippine supplier provides the services of 2 procurement professionals with whom the business is in weekly contact.

The Canadian supplier for KP provides of software and managed services. Occasionally KP will import equipment from well-established, reputable equipment suppliers in Europe, principally Frequentis in Austria and Rohde and Schwarz in Germany.

### Assessing the risks of modern slavery practices

#### Assessment

In the prior Financial Year Kordia carried out an initial assessment of the business and supply chains to assess the risks of modern slavery practices and we revisited that assessment on a desktop basis in the Financial Year. "Risks of modern slavery practices" refers to the risk that Kordia may cause, contribute to, or be directly linked to, modern slavery through our own business operations or our supply chains. We did this by assessing our operations and supply chains with the involvement of a range of our teams throughout our operations, including procurement, legal and risk.

We determined that, in our direct business operations, which are carried out in Australia, particularly our employment processes, the risk of modern slavery practices is



small. We also determined that the risk of our suppliers (and other entities in our supply chains) engaging in modern slavery practices is more significant, particularly for the suppliers and other entities operating in jurisdictions considered high risk, that is, where modern slavery practices are known to occur.

In implementing our Modern Slavery Policy, Kordia prioritised focusing on those areas of our supply chains that involved high risk geographic locations and focussed on risks with our direct suppliers. It is acknowledged that, as we continue to consider this risk and necessary steps to implement our Modern Slavery Policy, Kordia will need to develop a plan to engage with our direct suppliers located in other jurisdictions, having regard to risk factors other than geographic risk (such as sector, industry, product and services risks), and also to engage with entities deeper within our supply chains.

Unfortunately, COVID-19 pandemic restrictions have prevented any visits to suppliers in overseas jurisdictions during the Financial Year. At the same time, we note there has been a decreased level of activity with suppliers in high risk jurisdictions compared to the prior period as noted under 'Kordia's supply chains' above and in the next section.

### **Risks in Kordia's supply chains**

Having regard to the risks that Kordia identified, the areas for focus for Kordia during the Financial Year were the supply agreements we had in place for:

- the supply of telecommunications equipment from China. The volume of this has greatly diminished compared to the prior period as a result of changes to the nature of KSA's work, and contract and customer changes, and supply chain issues caused by the COVID-19 pandemic, and reduced capex in the context of the divestment process;
- the provision of professional services (such as drafting services) from India (KSA only) ceased during the period as KSA's underlying contract expired; and
- the provision of procurement services from the Philippines (KSA only) – this is for the services of 2 procurement professionals with whom KSA is in weekly contact.

China, India and the Philippines are referred to in this statement as **High Risk Jurisdictions**.

### **Kordia's Modern Slavery Policy**

During the previous Financial Year Kordia first developed, and then commenced implementation of, our Modern Slavery Policy and we have continued to implement this during the Financial Year. Our Modern Slavery Policy applies to Kordia. Kordia's Modern Slavery Policy sets out Kordia's commitment to:

- limit the risks of modern slavery practices in Kordia's business and supply chains;
- take action to assess and address those risks of modern slavery practices in Kordia's business and supply chains; and
- if Kordia identifies that it has directly caused or contributed to adverse modern slavery impacts in its business or supply chains, take appropriate remediation action.



Kordia encourages openness by Kordia's directors, officers, employees and consultants (**personnel**) and supports all personnel who may raise issues relating to modern slavery. Personnel are also encouraged to provide feedback on our Modern Slavery Policy and suggest ways it can be improved.

### **Due diligence and remediation processes**

Due diligence processes are the ongoing management processes Kordia adopts to identify, prevent, mitigate and account for the risks of modern slavery practices. In the Financial Year Kordia continued its due diligence processes designed to identify and assess potential modern slavery risks in our supply chains and mitigate the risk of modern slavery occurring in our supply chains, in each case, focussing on our suppliers in High Risk Jurisdictions. This was desktop-only as travel was curtailed and limited in scope as the volume of supply from high risk jurisdictions decreased during the financial year.

Remediation action is required only where Kordia identifies that we caused or contributed to modern slavery practices. Remediation action seeks to overcome the adverse impact that any such modern slavery practices have had on impacted individuals.

### **Identification and assessment of risks**

During the Financial Year, Kordia required its existing suppliers in High Risk Jurisdictions to complete our due diligence questionnaire, noting the decrease in volume of supply. We consider these suppliers to be reputable. No concerns were raised in the desk-top review of the responses to those questionnaires and, consequently, no remediation actions have been taken by Kordia during the Financial Year. The COVID-19 pandemic restrictions have continued to prevent site visits to suppliers in High Risk Jurisdictions during the Financial Year.

### **New contractual provisions**

During the previous Financial Year Kordia developed comprehensive modern slavery provisions for inclusion in its standard contract templates. All supply contracts entered into with new suppliers located in a High Risk Jurisdiction in future will include these new standard modern slavery provisions.

### **Monitoring our effectiveness**

In respect of the Financial Year and for the period up to the divestment of KSA on 31 October 2021, KSA's Legal & Commercial Manager is the Compliance Manager for Kordia under our Modern Slavery Policy. The Compliance Manager has day-to-day responsibility for ensuring personnel understand their obligations under our Modern Slavery Policy, developing training programs, working with other personnel to engage with suppliers and build awareness of modern slavery practices, monitoring the use and effectiveness of our Modern Slavery Policy and working with other personnel to ensure continued improvement in Kordia's actions to address modern slavery risks in its business and supply chains. The Compliance Manager is supported by other Kordia personnel as necessary to carry out this role.

From 1 November 2021, KP's Acting General Manager of Maritime is the Compliance Manager for KP.



### Plans for future action

Over the next year, having regard to the impact the current global pandemic will have on our ability to take particular actions, to the extent applicable, Kordia will focus on taking steps towards ensuring that:

- all of its suppliers and subcontractors in High Risk Jurisdictions have Kordia’s new standard modern slavery provisions included in their contracts;
- if existing contracts are renewed, or new supply contracts are entered into, these contracts contain Kordia’s standard modern slavery provisions;
- audits are undertaken of Kordia’s key suppliers in High Risk Jurisdictions; and
- training on how to identify and report concerns relating to modern slavery practices is provided to relevant Kordia personnel.

### Governance

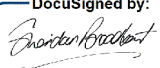
Kordia Group’s board of directors (**Board**) has overall responsibility for oversight of Kordia’s Modern Slavery Policy. The Board is advised by Kordia Group’s Audit and Risk Committee in relation to compliance with our Modern Slavery Policy.

KSA and KP are wholly owned subsidiaries of Kordia Group, which are both overseen by the Kordia Group Board, which appoints the Directors of KP and KSA. KSA and KP do not have additional Board meetings and the Directors of KSA and KP report into the Kordia Group Chief Executive Officer who reports to the Kordia Group Board.

The Kordia Group issues delegations of authority to govern each subsidiary in the Group, including KSA and KP. Senior Management of KSA and KP have overseen the preparation of and approved this Modern Slavery Statement prior to its approval by the Kordia Group Board.

As noted above, KSA was divested on 31 October 2021. KP’s revenue for the financial year ending 30 June 2022 will be well below the reporting threshold.

**This statement is made pursuant to the Modern Slavery Act 2018 (Cth) by Kordia Group Limited, in respect of the Financial Year ended 30 June 2021, on behalf of its subsidiaries Kordia Solutions Pty Ltd and Kordia Pty Ltd.**

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**Signature of Chair**

Sheridan Broadbent

**Name of Chair  
Kordia Group Limited**

15 December 2021

**Date**

