



# Modern Slavery Statement – Kinetic TCo Pty Ltd

Revision 3

Effective Date 1 January 2024

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## 1 Overview

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 or the Group) 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.

The 2020 financial year marked the start of Kinetic's modern slavery due diligence journey. It was the first period in which Kinetic undertook mandatory reporting on modern slavery, in accordance with the Act.

Kinetic is pleased to highlight the progress made in its modern slavery risk assessment process during the 2022 financial year, and the actions it has taken to further mature its response to modern slavery risk management in the 2022 Modern Slavery Statement.

This includes an enhanced supplier due diligence process supported by the procurement team, further enhancements to contractual terms with its suppliers to describe Kinetic's modern slavery obligations and expectations, and a shift from a reactive to a more proactive approach to modern slavery management.

Based on the due diligence undertaken on our clients and suppliers, Kinetic is pleased to announce that no instance of modern slavery was identified in its operations in the 2022 reporting period.

## 2 Kinetic's Structure, Operations and Supply Chains

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. The Group employs over 7,300 people across Australia and New Zealand, move approximately 100 million people annually on our fleet over 4,900 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, Western Australia and New Zealand including airport and route bus services. Kinetic operates under various branded trading names, including Kinetic, Go Bus, NZ Bus, SkyBus, Johnston's and Kinetic Resources.

To assist delivery and improvement of these services, Kinetic works with a network of suppliers. Kinetic's supply chains include mainly the manufacturers of bus parts, fuel suppliers and vehicle maintenance service providers. Kinetic also directly or indirectly engages suppliers providing ancillary services, 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.

Kinetic is committed to understanding this, as well as any other contributing factors that may impact the risk exposure of its supply chain.

## 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 has been 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.

Further, Kinetic will ensure that all suppliers complete the Supplier Questionnaire annually and declare that they do not engage any modern slavery practices in their supply chains.

## 5 Kinetic’s Compliance Framework

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.

Kinetic has overhauled the Kinetic policies and procedures framework, the Kinetic Way, including the development of structures to allow appropriate review and analysis of our suppliers and the issuance of the Supplier Management Procedure and Supplier Questionnaire.

As part of our ISO accreditation obligations, Kinetic has developed an internal and external audit procedure to actively evaluate and control Kinetic’s compliance with our own policies. Kinetic also continuously monitors reported trends and cases of modern slavery occurring in the transportation industry locally and globally. Modern slavery training is offered to all relevant Kinetic employees at the commencement of their employment and periodically.

## 6 Kinetic’s Key Areas of Action

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. The supplier contract templates specifically describe Kinetic’s expectations surrounding modern slavery. Reciprocal commitment in relation to the following items seeks to ensure appropriate management of Kinetic’s potential exposure to modern slavery risk associated with suppliers:
  - / Mutual commitment to compliance with all modern slavery laws;
  - / Understanding reasonable steps to ensure there is no modern slavery in either party’s supply chain, or elsewhere in its business operations;
  - / Notification to the other party, should either party contravene modern slavery laws;
  - / Implementation of due diligence procedures (including policies, procedures, investigations and systems as deemed necessary) in relation to each party’s own supplier and

subcontractors, to ensure there is no modern slavery in the supply chain or business operations of the party.

- / 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.
- / Conduct periodic supply chain assessment and audit.
- / Provide training to all relevant Kinetic employees to ensure everyone within the Group is familiar and aware with modern slavery requirements.
- / Encourage employees to “speak up” if they are subject to, or become aware of, incidents of modern slavery through the Kinetic Whistleblowing Policy and internal communications.

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 Directors of the members of Group subsidiaries comprise our two CEOs, who are also members of the Kinetic TCo Board of Directors. 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.

## 7 Assessing the Effectiveness of the Actions Taken

Kinetic will undertake continuous and ongoing assessment of its supply chains by evaluating information that it receives from the suppliers and to promptly act on allegations or findings of involvement in such practices. It will also set up an annual review process whereby members of senior management will review the relevant policies and procedures and responses to modern slavery.

Over the next reporting period, Kinetic will continue to assess ways to reduce the risks of modern slavery and some steps to be taken will include:

- / Update Kinetic’s Supplier Code of Conduct;
- / Assess the modern slavery policies and processes of major suppliers of Kinetic, and;
- / Set up an annual review process with members of senior management.

**This statement is made on behalf of Kinetic TCo and the following Australian subsidiaries:**

| Company Name                      | ACN         | Company Name                               | ACN         |
|-----------------------------------|-------------|--------------------------------------------|-------------|
| Kinetic Group Investments Pty Ltd | 663 807 172 | Kinetic Group Holdings Pty Ltd             | 663 807 592 |
| Kinetic Group Midco Pty Ltd       | 663 808 240 | Kinetic Group Finco Pty Ltd                | 663 808 795 |
| Kinetic Holding Company Pty Ltd   | 601 254 880 | Kinetic (Melbourne Urban) Pty Ltd          | 632 522 233 |
| Kinetic Fleet Services Pty Ltd    | 101 184 507 | Australian Bus and Truck Pty Ltd           | 639 331 909 |
| Kinetic (Melbourne) Pty Ltd       | 644 690 522 | Kinetic Fleet Services (Melbourne) Pty Ltd | 635 410 070 |
| Comity Pty Ltd (ACN               | 007 245 132 | Avalon Airport Express Pty Ltd             | 615 862 710 |
| BTI Pty. Limited                  | 010 155 398 | Kinetic Group Services Pty Ltd             | 615 925 445 |
| Skybus (QLD) Pty Ltd              | 621 666 831 | Calabro Bros Holdings Pty Ltd              | 615 924 788 |

| Company Name                          | ACN         | Company Name                                     | ACN         |
|---------------------------------------|-------------|--------------------------------------------------|-------------|
| Transit Australia Group Pty Ltd       | 600 302 725 | Gulf Tech Pty Ltd                                | 603 693 116 |
| Surfside Buslines Pty Ltd             | 010 957 552 | Transit Australia Pty Limited                    | 065 794 943 |
| Kinetic Specialised Resources Pty Ltd | 144 818 128 | Kinetic Specialised Resources (Holdings) Pty Ltd | 144 818 128 |
| Mackay Transit Coaches Pty Ltd        | 050 416 227 | Bingley Group Pty Ltd                            | 603 071 343 |
| East Tamar Bus Lines Pty Ltd          | 630 494 567 | Redline Holdings Pty Ltd                         | 009 493 805 |
| Redline Investments Pty Ltd           | 009 516 867 | Mersey Bus & Coach Services Pty Ltd              | 009 583 779 |
| Phoenix Coaches Pty Ltd               | 056 587 449 | Kinetic (Tasmania) Pty Ltd                       | 009 499 094 |
| Jamist Pty Ltd                        | 009 584 043 | Tascoast Pty Ltd (                               | 009 559 424 |
| Tasmanian Retreat Tours Pty Ltd       | 009 498 186 | TAG Mobility Services Pty Ltd                    | 622 327 431 |
| Kinetic (NSW 1) Pty Ltd               | 168 516 014 | Kinetic (NSW) Pty Ltd                            | 658 551 976 |
| Bus & Coach Support Services Pty Ltd  | 615 112 760 | Reyipo Holdings Pty Ltd                          | 160 949 066 |
| Telford Educational Tours Pty Ltd     | 057 934 148 | Yourbus Pty Ltd                                  | 600 746 615 |
| Marrickville Bus Lines Pty Ltd        | 050 034 127 | Kinetic (WA) Pty Ltd                             | 657 207 559 |
| Kewell (Alonso) Topco Pty Ltd         | 659 676 525 | Kewell (Alonso) Holdco Pty Ltd                   | 659 676 963 |
| Kewell (Alonso) Pty Ltd               | 659 677 451 | KOCM 1 Pty Ltd                                   | 671 444 474 |
| KACM 1 Pty Ltd                        | 673 334 766 | KACM 2 Pty Ltd                                   | 673 334 882 |
| KACM 3 Pty Ltd                        | 673 335 030 |                                                  |             |