



MODERN SLAVERY STATEMENT





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OUR COMMITMENT

Since our inception we still operate with the same values of **Respect, Learning, Quality and Performance** underpinning how we go about our daily business.

Respect is the cornerstone of our business and is at the core of what we do. Kingston's commitment to Environmental, Social and Corporate governance and Modern Slavery risks are reinforced through our policies and procedures, which are imbedded in our daily operations.

KBA Group welcomes this opportunity to actively consider modern slavery and the risks of modern slavery within our operations and supply chains.

KBA Group's commitments are structured around three key areas:

People

The success of KBA's business is based on the quality of our people, many of who are industry leaders, having extensive construction and development experience and expertise. We are committed to establishing and investing in long term relationships with clients, staff, communities, suppliers and subcontractors in the absolute belief that this approach creates the greatest value for all.

KBA's commitment to respecting diversity, human rights, labour rights and the right to decent work entails:

- Having zero tolerance for all forms of bullying and discrimination, including verbal, physical and sexual harassment in accordance with KBA's Anti Bullying Policy and Sexual Harassment Policy.
- Being an equal opportunities employer.
- Ensuring our workforce have flexible working arrangements.
- To work against discrimination on the basis of gender, ethnicity, skin colour, language, religion, sexual orientation, age, disability, political opinions or other opinions, national or social origin and affiliation with national minorities in accordance with KBA's Anti Discrimination Policy.
- To consider gender imbalance as a risk and therefore strive for gender balance in all parts of the business. To work for equal pay for equal work of equal value, and to systematically work to redress any potential imbalances and close the pay gap that may be due to gender.
- To offer a workplace environment that is conducive to good health.
- To give all employees the opportunity for competency and skills development.
- To grant employees the fundamental right to be represented by a trade union.
- To have routines and channels in place for notifying breaches of these commitments.

Planet

At KBA we recognise the critical importance of environmental sustainability including water and energy efficiency, pollution reduction, recycling and the implementation of best practice urban design principles to protect the future health and prosperity of the planet.

We are committed to continual improvement of our environmental performance, regularly reporting against our sustainability goals. While some companies don't appreciate the importance of this, we do. It's not "all about us", it's what we are leaving for future generations. Respect for the environment and available resources are embraced throughout KBA.

Performance

At KBA we are focused on delivering services which leave a smile on the face of our clients. We take great pride in constructing quality buildings and providing repairs with exceptionally high standards of finish and client satisfaction.

KBA has received many industry awards for excellence both State and Nationally. KBA commitment to upholding the highest ethical and corporate governance standards entails:

- To have a robust internal system against corruption, based on transparency and verifiability.
- To train employees in issues related to anti-corruption, money-laundering and bribery.
- To uphold the privacy of our customers, customer's end users and employees. KBA shall at all times comply with relevant data protection and privacy legislation.
- To not enter into partnerships with or invest in companies that, through their own business or through entities they control, violate international and national laws, or KBA's internal guidelines, for human rights, labour rights, environmental regulations or anti-corruption.
- To not purchase goods and services from suppliers that violate international and national laws, or KBA's internal guidelines, for human rights, labour rights, environmental regulations or anti-corruption.
- To comply with KBA's Supplier Code of Conduct that sets forth the minimum standards of business conduct that we expect from all of our suppliers.

OUR POLICY

KBA Group understands that business plays an important role in respecting and promoting human rights and eradicating modern slavery.

The KBA Group board of directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Our Chief Executive Officer has day-to-day responsibility for implementing and monitoring this policy and dealing with any queries about it.

Management at all levels are responsible for ensuring those reporting to them understand the issue of modern slavery and comply with this policy.

We recognise that modern slavery is a growing and complex problem, best tackled by collective commitment and responsibility to bring it to an end and we are committed to working with all our stakeholders to fulfil this common goal.

KBA Group ensures they:

- are compliant with local, national and other applicable laws and regulations in the areas in which the businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social and environmental practices;
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

The principles of this policy are incorporated into contracts with our suppliers and subcontractors to ensure that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.

Each division/business unit must, as far as practicable, use in its operational and supplier contract terms the following requirements:

- (i) The Supplier / Subcontractor warrants that:
 - (a) Its direct conduct, and to the extent that it can reasonably control, its supply chain's conduct under or in connection with this Subcontract will not constitute Modern Slavery;
 - (b) It will notify KBA Group if it becomes aware that Modern Slavery is occurring in its supply chain; and
 - (c) It has put in place reasonable processes, procedures, investigations and compliance systems and has taken (and will continue to take) reasonable actions and investigations to ensure that the warranties made in this clause are valid at all times until the issue of the Final Certificate.
- (ii) Without limiting the operation of any other clause in this Subcontract, the Subcontractor must:
 - (a) provide information as requested by KBA Group in order for its to comply with its obligations under Modern Slavery including assisting KBA Group or any person engaged by the Principal under the Head Contract, to undertake any audit, or checks of the Subcontractor or its contractors engaged to perform the Works.
 - (b) comply with any code, guideline or directions issued by KBA Group or any authority under Modern Slavery Law

DUE DILIGENCE

Due Diligence is incorporated into all KBA business. KBA considers how it may cause, contribute to, or be directly linked to modern slavery practices and its ongoing risk management process of human rights diligence aims to identify, prevent and mitigate adverse impacts.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

Our internal policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

Continuous reviews of policy and procedures ensures alignment with outcomes relevant to modern slavery obligations. Modern Slavery training is provided to all staff who procure goods on behalf of KBA.

We have embedded checks for modern slavery in our routine supplier due diligence process and have raised awareness of these issues with the Supply Chain Team who manage this supplier vetting process.

The due diligence process reflects the relative risk for potential suppliers and includes:

- Checks against global sanctions and enforcement databases to identify risks including human rights abuses, human trafficking, and labour violations.
- Review the Modern Slavery statements register
- If Modern Slavery statements are not available on the register potential suppliers are subject to further vetting and evaluation and will be asked through our questionnaire about their policies and procedures in place regarding human rights, modern slavery, forced labour, child labour or human trafficking.
- As part of our Supplier Code of Conduct, KBA Group requires suppliers to fully comply with the applicable legal requirements of slavery, forced labour and human trafficking laws and expects suppliers to enact practices to ensure compliance with such laws.
- All contracts with our Suppliers / Subcontractors include clauses on complying with Modern Slavery legislation and must be signed and approved prior to any work being allocated.
- KBA Group conducts tender interviews with Subcontractors and Suppliers where relevant and include questions that require a response before a contract can be agreed regarding lawful engagement of workers under Australian law, any sanctions imposed and if non conforming employment practices, such as Modern Slavery, are suspected, agreement is given for book audit of Subcontractors and Suppliers by KBA Group.

REMEDIATION

KBA Group recognises the responsibility that we share with our suppliers to provide remedy to victims of slavery. If modern slavery is found, it is vital to act quickly and to protect the victim.

Definition of a complaint

KBA Group defines a complaint as a report of violation against Modern Slavery Policy that has occurred in KBA Group's supply chain and/or internal business and has a direct adverse human rights impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.

Response procedure

The KBA Group process for responding to violations will be to:

- Conduct an initial assessment of the allegations to ensure that there is sufficient information to understand the exploitation discovered and remedy it.
- Ascertain if a supplier or labour provider is implicated.
- Report the allegations to relevant authorities.
- Capture evidence about the violations, using an independent third party if necessary.
- Gather information from those affected.
- Take immediate steps to correct the situation for the worker, which will need to be tailored to their individual circumstances.
- Work with local authorities and local authorities to provide assistance (on the express consent of the victim).
- Document remedial steps taken.
- Evaluate how effective the remediation procedure was and amend it accordingly.
- Review internal policies and procedures to determine what needs to change to prevent slavery from re-occurring.

COMPANY OVERVIEW

KBA Group is a privately owned construction company which has been operating since 2007. Business activities consist primarily of building and restoration services in response to insurance events throughout Australia.

Combining national expertise with local knowledge, we operate in Newcastle, Sydney, Brisbane, Melbourne and Perth and regionally throughout New South Wales, Queensland, Victoria and Western Australia.

KBA Group does not operate outside of Australia thereby providing greater control and oversight of the company's exposure and risk of modern slavery.

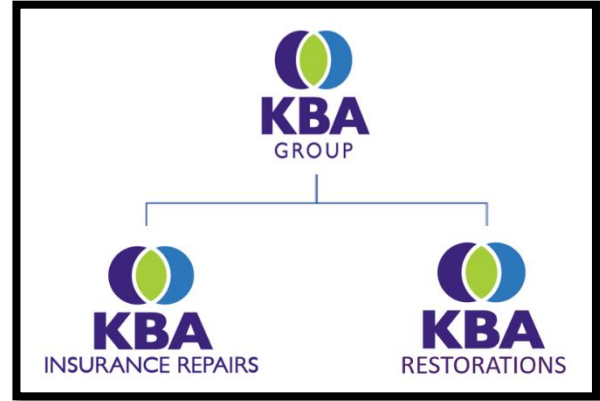


STRUCTURE & GOVERNANCE

KBA Group is privately owned, and led by our CEO, Board of Directors, and Executive Management Team.

KBA Group consists of the following entities

- KBA Insurance
- KBA Restorations



The entities operate under the same management and operational structure therefore all supporting materials, information and updates are shared.

Our Executive Team support and lead the business around the country, with KBA Group currently employing 95 FTE across its 4 offices.

KBA Group is committed to robust policies and practices that are critical to the continued success and prosperity of the organisation.

Our Modern Slavery risk mitigation is led by our Modern Slavery Working Group comprising of:

- Chief Executive Officer
- Systems Manager
- Supply Chain Department

Progress against our Modern Slavery risk mitigation strategy is discussed at board level during management review meetings.



OPERATIONS

As a nominated insurance builder, KBA Group's main operations consist of assessing, quoting and coordinating the repair and/or restoration of insured premises, primarily residential, through our sub-contractor network of trades and partner suppliers. KBA Group has operations in 4 States throughout Australia.



In conjunction with this KBA Group also operates in the Major Loss and Commercial Insurance Repairs categories responding to 'catastrophe events'.



FOCUS AREAS



Health & Safety (People)

At KBA Group we are committed to the elimination of workplace injury and illness and ensure high standards of health and safety for our workers, clients, visitors and the public

KBA Group is certified to ISO45001 and is also Federal Safety Accredited.



Environmental (Planet)

At KBA Group we are committed to the protection of the environment and recognize the impacts that our business has on the environment. KBA Group's focus is on our environmental responsibility and sustainability. KBA is focused towards net zero carbon emissions by 2026.

KBA Group is certified to ISO14001.



Quality (Performance)

At KBA Group we are committed to the provision of a quality product, defect free.

This is demonstrated through provision of resources, internal audits and continual improvement processes.

KBA Group is certified to ISO9001.



Our Clients

Communication is at the forefront of building a collaborative working relationship

We are committed to meeting the needs and expectations of our clients by providing quality services and products which are defect free, competitively priced, constructed and delivered on time while complying with Safety, Environmental, Statutory, Regulatory obligations and other requirements.



Our Trades

At KBA Group we are proud of the trades that partner with us and are committed to helping them reach their potential.

Our supply chain department ensure that our trades are paid on time and at fair market rates for the work that they are undertaking.



Our Society

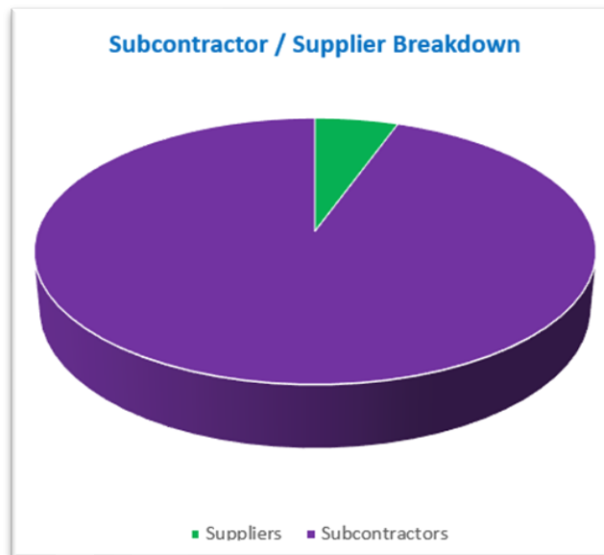
At KBA Group we have always been involved in a social purpose which has gone above just building. KBA Group ensures they:

- are compliant with local, national and other applicable laws and regulations in the areas in which the businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social and environmental practices;
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations and supply chains.

SUPPLY CHAIN

KBA Group has approximately 3000 direct subcontractors and suppliers and has a dedicated Supply Chain team to manage, assist and monitor subcontractor and supplier activities.

While the majority of KBA's supply chain are Subcontractors KBA Group's supplier relationships are managed and monitored by our Supply Chain team.



KBA Group's focus has been on consolidating our supply chain and entering agreements with companies whose values align with KBA's. We are working with our suppliers to ensure they are aware of and understand the principles and guidelines of the Modern Slavery Act and ensure their downstream contacts follow our aligned principles.

KBA have audited the Modern Slavery Statements of the following companies:

- Bunnings Group Limited
- J Blackwood & Sons Pty Ltd
- The Workwear Group
- Officeworks
- PPG Australia Group (Taubmans)
- Bluescope Steel Limited
- Metroll Pty Ltd
- Harvey Norman Pty Ltd

KBA educate and monitor smaller suppliers through KBA's modern slavery questionnaire during the onboarding process and throughout service provision.

OPERATIONAL RISK

Sector & Industry Risks

Forced Labour

- Subcontractors in Construction and/or Restoration/Labour Hire
- Low paid migrant workers
- Consideration – Under minimum wage/Debt bondage

Product & Services Risks

Imported Products

- Ancillary Products e.g. Laptops, computers, phones, uniforms
- Building products eg. Timber, steel
- Consideration – Country of Origin. Check Global Slavery Index and/or Freedom House List.

KBA is continually working on identifying operational risks within the company and eliminating any modern slavery risks from within our Supply Chain. It is a key focus of KBA Group to ensure that we are engaging subcontractors and purchasing through suppliers that are aware of and exercise diligence around modern slavery risks.

ACTIONS / CONSULTATION / MITIGATION

KBA Groups efforts are currently focused on information and training, mitigation and collaboration.

Information & Training

KBA Group carries out Modern Slavery and ESG policy awareness and training during our onboarding process with annual updates for all employees.

Training incorporates the Australian Government toolkit for Addressing Modern Slavery in Government Supply Chains.

KBA systems and procedures incorporate ESG and Modern Slavery policy and procedures as part of our business.

Mitigation

KBA Group focus is on Modern Slavery risk mitigation.

All KBA Contracts contain modern slavery clauses and the subcontractor onboarding process incorporates multiple rationalization stages ensuring the integrity and accountability of our subcontractors and suppliers.

Our Supply Chain department vets new subcontractors and suppliers to ensure alignment with KBA's values.

Engagement & Collaboration

KBA Group works with our clients, subcontractors and suppliers to ensure that we are all working towards the same common goals in regards to ESG and Modern Slavery.

Obligations: The Supplier must

- Promptly notify KBA if it becomes aware of a possible, potential, suspected or actual breach by it or its representatives of any Modern Slavery laws;
- Cooperate in good faith with KBA in investigating the circumstances relevant to any possible, potential, suspected or actual breach of any Modern Slavery laws;
- Require its suppliers to implement their own binding guidelines for ethical behaviour and compliance with Modern Slavery Laws.

EFFECTIVE ACTION

KBA Groups commitment to eliminating Modern Slavery Risks from our business and associated subcontractors and suppliers is dependent on learning and continual improvement with attention to detail being on:

Education / Training



Monitoring and Review



Reporting and Analysis



Continuous Improvement



DIRECTORS COMMITMENT



Colin Robards
Chairman



Mark Robards
Director of Finance



Simon Webber
Director
Commercial Insurance Repairs

At KBA Group, we maintain a zero-tolerance approach to modern slavery and are committed to:

- Staying informed about relevant legislation
- Assessing and mitigating business risks associated with modern slavery, especially within the building and construction industry
- Learning from key stakeholders and promoting awareness
- Maintaining open and safe communication channels throughout our business and supply chain

We understand the importance of Modern Slavery Statements and continually work to improve our systems and controls.

KBA Group is dedicated to playing a positive role in combating modern slavery within the building and construction industry and contributing to a more just and equitable society.

This statement was approved by the board of KBA Group in their capacity as principal governing body of KBA Group on 30 June 2024.

Colin Robards
Chairman – KBA Group

COMPANY DETAILS

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SA BUILDING DETAILS

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