

Kings Consolidated Group Modern Slavery Statement FY2022

Introduction

The Modern Slavery Act 2018 (Cth) (**the Act**) defines 'modern slavery' as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Kings Consolidated Group Pty Ltd (**Kings Group**) (ABN 98 109 784 803) are committed to acting ethically and with integrity and transparency in all business dealings. Kings Group respects ethical labour practices and values and promotes diversity. Consistent with these principles, Kings has a zero-tolerance approach to any form of modern slavery in its operations or supply chain.

This statement is published by the Kings Group and its subsidiaries, pursuant to the Act. The statement sets out the actions taken by the Kings Group to assess and address modern slavery risks in our business and supply chain for the financial year ending 30 June 2022.

Our Structure and Operations

Kings Group is a privately owned Australian company, with headquarters in Melbourne including a national footprint and operations in Auckland, New Zealand. Kings Group was founded in 1991 and the company has approximately 300 employees, approximately 250 company-owned vehicles and a network of around 700 subcontractor drivers made up of both sole traders and companies across Australia and New Zealand.

The following entities form the Kings Group:

Entity name	ABN
Kings Consolidated Group Pty Ltd	98 109 784 803
Kings Transport Services Unit Trust t/as Kings Transport Logistics (VIC) Pty Ltd	90 519 189 347
Kings Transport & Logistics (NSW) Pty Ltd	94 096 879 962
Kings Transport & Logistics (QLD) Pty Ltd	50 102 617 621
Kings Transport & Logistics (SA) Pty Ltd	70 108 757 160
Kings Transport & Logistics (WA) Pty Ltd	66 108 763 686
Kings Transport (NT) Pty Ltd	18 108 846 037
Kings Transport (ACT) Pty Ltd	24 108 846 000
Kings Transport (TAS) Pty Ltd	80 108 845 996
G & M Walker Haulage Pty Ltd	95 003 316 283
Kings Warehousing Pty Ltd	67 113 662 927
Kings Healthcare Logistics Pty Ltd	53 079 267 057
Benson Properties Unit Trust t/as Faxton Developments Pty Ltd	46 073 979 880
Kings Administration (NSW) Pty Ltd	84 098 223 173
Kings Administration (QLD) Pty Ltd	48 102 617 612

Kings Administration (SA) Pty Ltd	68 108 757 151
Kings Administration (WA) Pty Ltd	68 108 763 695
Kings Warehouse Administration Pty Ltd	28 050 027 462
National Fleet Administrative Services Pty Ltd	53 085 912 670
National Fleet Services Pty Ltd	43 085 912 689
Transport Fleet Services (VIC) Pty Ltd	23 102 507 782
Transport Fleet Services (NSW) Pty Ltd	40 098 815 555
Transport Fleet Services (QLD) Pty Ltd	21 102 507 773
Transport Fleet Services (SA) Pty Ltd	90 108 573 806
Transport Fleet Services (WA) Pty Ltd	41 108 763 579
Kings IP Pty Ltd	51 113 747 916
Kings Transport & Logistics (AUST) Pty Ltd	82 110 456 561
Forum Transport Pty Ltd	57 108 009 007
National Fleet Services (NSW) Pty Ltd	76 102 484 962
National Transport & Logistics (NSW) Pty Ltd	88 108 573 360
Blue Circle Transport Pty Ltd	88 115 732 566
Kings Express Pty Ltd	43 080 880 020
Kings Removals Pty Ltd	49 111 622 818
Building Logistics Management Pty Ltd	71 110 548 420

The Kings Group's main operations include a fleet of vehicles ranging from bike couriers, vans and rigid trucks to semi-trailers and crane trucks. The Kings Group mainly specialises in intrastate urban deliveries, and is also capable of delivering interstate, nationally and into regional areas. The Kings Group also provides third party logistic solutions that include warehousing operations.

Our Supply Chain

Today, the Kings Group services a variety of multi-national and SME clients across the home delivery, industrial, consumer, e-commerce and health industry sectors.

Kings Group's supply chain supports the safe transportation of products manufactured and sold by our clients in the above industry sectors. Kings Group's supply chain operates in the 3PL environment, extending the delivery and logistical services offered by our clients to their customers through the use of company operated vehicles as well as subcontracted vehicles.

Kings Group's supply chains also include the procurement of goods and services from suppliers that contribute to its operations. Kings Group's procurement arrangements for the reporting period include acquisition of products and services such as; subcontractors, agency labour, trucks (and related parts and components), fuel, tyres, safety equipment, IT equipment, personal equipment and clothing (uniforms), stationery, cleaning, wrapping/packaging, software and hardware.

Despite the majority of Kings Group's suppliers being located in Australia, Kings Group recognises that its suppliers are likely to have acquired products manufactured elsewhere in the world, which presents potential modern slavery risks deeper within the supply chain.

Risks of Modern Slavery in Operations and Supply Chains

Operating in the transport and logistics sector, we are aware of the potential of Kings Group to cause, contribute to or be linked to modern slavery through our operations and supply chains.

Taking into account the industry of the Kings Group, there is a risk of causing or contributing to modern slavery through the use of labour in vulnerable populations or through the engagement of labour hire agencies and subcontractors. The Kings Group is aware of these potential risks and the need to monitor and address these in an appropriate manner. Such risks include:

- Labour rights, including forced or compulsory labour, wages and benefits, work hours and child labour (including unskilled, temporary or seasonal labour)
- Health and safety (for workers that Kings Group do not control (or who are otherwise engaged in operations outside of Kings Group's control)).

Kings Group works with a large network of suppliers, labour hire agencies, subcontractors and customers around Australia and in New Zealand. This is also applicable to suppliers from which Kings Group source the products and services it requires to operate. Therefore, processes regarding modern slavery during the tendering process;

- ongoing audit questionnaire and declaration form for subcontractor drivers; and
- update and distribution of contractor agreements to ensure they incorporate modern slavery provisions.

Actions taken to assess and address the risk of Modern Slavery

Kings Group continues to take a methodical approach to implementing and introducing an ethical supply chain framework and increasing engagement with suppliers and subcontractors to identify risk, assess and address modern slavery.

Kings Group has implemented the following practices, policies and procedures to continue to combat modern slavery across the group:

- Anti-Modern Slavery Policy
- Diversity and Workplace Conduct Policy
- Whistle-blower Policy
- Code of Conduct Standard
- Enterprise agreements and awards
- Recruitment and selection policies and standards
- Supplier and subcontractor management policies and systems
- Supplier Code of Practice

Steps that the Kings Group have taken over this reporting period and are looking to take moving forward to ensure continued assessment and mitigation of risk within the company and in its supply chain include:

- provide training to our employees regarding their obligations under any compliance policies;

- annual and on commencement training provided to employees regarding modern slavery, our responsibility as a business, potential risk factors and signs of modern slavery and how to support a suspected breach of our Modern Slavery Policy;
- updating, review and implementation of relevant policies including; employment checks policy and Anti-Modern Slavery Policy;
- introduction of updated contractor agreements;
- facilitated audits of our suppliers and subcontractors through a questionnaire and declaration against the modern slavery act obligations;
- working with suppliers and subcontractors to strengthen their internal policies and procedures; and
- using its leverage to work with those in its supply chain to implement solutions that meet human rights standards.

The Kings Group consultation process is consistent throughout the consolidated group due to the one management structure across all entities. Corporate officers reporting into Kings Group disseminate/direct compliance measures within their respective entities. Therefore, modern slavery compliance is disseminated throughout this Group Structure accordingly.

Assessment & Effectiveness of our Actions

The Kings Group recognises the importance of monitoring how effective its anti-modern slavery processes are. It has and continues to actively take steps to put plans in place regarding its approach to assess and address modern slavery risks.

At Kings Group, we have utilised our network of employees to oversee the effectiveness of the relevant actions taken to address modern slavery. Whilst our Modern Slavery efforts and responsibilities sits within the remit of our Audit & Risk Committee, we intend to explore the establishment of working groups that will look to assess and contribute towards Kings Group's Modern Slavery's efforts. This working group would meet regularly to discuss actions taken and their effectiveness.

For our supply chain partners, we continue to work to better assess the effectiveness of our actions to address modern slavery, including establishing processes and procedures for:

- scheduled internal audits of our suppliers;
- scheduled audits of our subcontractors;
- regular review and assessment of our actions by our Audit & Risk Committee;
- annual review of supplier declarations; and
- efficiently acknowledging and addressing any cases reported through grievance mechanisms.

The Kings Group recognises the need to continuously assess and build on our understanding and management of modern slavery risks in our operations and supply chains and continually aims to:

- build on our work from previous financial year/s; and
- address and assess the outcome of our anti-modern slavery actions within our organisation and our supply chain; and
- provide training to our employees regarding their obligations under any compliance policies.

Collaboration

Kings Group seeks to be the best. Kings Group is committed to working with its employees and subcontractors to improve its modern slavery response.

Kings Group will continue to engage with external stakeholders and take advice (where appropriate) to ensure contract arrangements are arranged and monitored in accordance with Australian employment law.

This statement was approved by the principal governing body for Kings Group, the Chairman of Kings Consolidated Group Pty Ltd on 14 December 2022.



Mark Mastroianni
Chairman of the Board, Kings Consolidated Group