MODERN SLAVERY POLICY

1. POLICY OBJECTIVE

Knight FM is committed to conducting business ethically and responsibly and to preventing Modern Slavery and human trafficking within our operations and supply chains.

We recognise the importance of protecting human rights and maintaining fair, lawful, and ethical labour practices across all areas of our business operations and supply chain activities.

In recognition of the complex problem of Modern Slavery, we have developed this policy to define the organisation's approach to preventing Modern Slavery across our supply chains and reporting any risks to our clients when these are identified.

2. SCOPE

This Policy applies to all employees, contractors, labour hire workers, officers, suppliers, subcontractors, host employers, and other third parties engaged by Knight FM Pty Ltd and its related entities.

All persons and organisations engaged by Knight FM are expected to comply with the principles and requirements outlined in this Policy.

3. RESPONSIBILITIES

Global Chief Operating Officer

The responsibilities of the Global COO are to:

- Support the operational implementation of the Knight FM Modern Slavery Policy across the organisation;
- Promote awareness of Modern Slavery risks and compliance obligations across business operations and supply chains;
- Ensure appropriate operational resources, systems, and support mechanisms are available to assist with compliance activities;
- Support training, risk identification, supplier engagement, and continuous improvement initiatives relating to Modern Slavery risk management;
- Escalate significant Modern Slavery risks or concerns to the CEO where appropriate.

The Chief Executive Officer

The responsibilities of the CEO are to:

- Provide executive leadership and organisational commitment to the prevention of Modern Slavery across the Company and its supply chains;
- Maintain ultimate accountability for the implementation and effectiveness of this Policy;
- Support ethical business practices and compliance with applicable Modern Slavery legislation and related obligations;
- Review significant Modern Slavery risks, incidents, or non-compliance matters escalated by management;

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- Approve organisational responses and hold sole authority for terminating commercial relationships due to modern slavery non-compliance.

The Head of HR and HSE

The responsibilities of the Head of HR and HSE are to:

- Develop and implement HR policies that align with the Knight FM Modern Slavery Policy, ensuring compliance with the Modern Slavery Act 2018 (Cth).
- Coordinate role-based modern slavery training and awareness programs across onboarding and regular training schedules.
- Regularly review internal employment practices, labour-hire arrangements, and supplier assessments to identify risk indicators.
- Oversee confidential grievance investigations and manage worker-centred remediation procedures.
- Report monitoring findings directly to the COO and CEO.

Senior Managers

The responsibilities of Senior Managers are to:

- Ensure internal teams and on-site personnel understand and adhere to this policy.
- Provide necessary support and resources for staff to complete required training.
- Monitor compliance across on-site service delivery, subcontractors, and labour providers.
- Facilitate client reporting requirements regarding supply chain integrity as stipulated by contract.
- Immediately escalate observed or suspected modern slavery indicators to the Head of HR/HSE and COO.

All Employees

The responsibilities of all employees are to:

- Read and comply with the Policy; and
- Participate in mandatory modern slavery training programs.
- Report any suspected modern slavery risks, unethical labour conditions, or human rights violations observed within Knight FM sites or supply chains.

4. MODERN SLAVERY RISK AREAS

Knight FM recognises that certain activities within the facilities management sector may present a heightened risk of Modern Slavery due to factors such as subcontracting, labour-hire arrangements, vulnerable worker populations and complex supply chains. Accordingly, Knight FM applies a risk-based approach to due diligence, monitoring and oversight, with particular consideration given to areas including, but not limited to:

- **Cleaning and Waste Management:** Subcontracted and labour-hire arrangements where there may be reduced visibility over employment conditions, including arrangements involving migrant or otherwise vulnerable workers.
- **Security Services:** Guarding and monitoring services vulnerable to excessive working hours, wage underpayment, and sham contracting.
- **Property Maintenance & Trades:** Subcontracting arrangements where operational visibility is reduced.

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- **Procured Goods & Consumables:** Direct and indirect sourcing of uniforms, textiles, cleaning chemicals, personal protective equipment (PPE), and electronic equipment manufactured in high-risk geographic locations.

5. DEFINITIONS

Modern slavery is defined by the Modern Slavery Act 2018 (Cth) to include eight types of serious exploitation, and which can be understood as:

Trafficking in persons, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;

Slavery, which is where the offender exercises powers of ownership over the victim;

Servitude, which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;

Forced labour, which is where the victim is either not free to stop working or not free to leave their place of work;

Forced marriage, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;

Debt bondage, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;

The worst forms of child labour, which involves situations where children are exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and

Deceptive recruiting for labour or services which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

Supply Chain: The products, services, and labour engaged by Knight FM within Australia or internationally. Where labour hire services are used, Knight FM requires providers to comply with all applicable labour hire licensing requirements. Knight FM seeks to maintain transparency over labour supply arrangements and does not permit unauthorised subcontracting or on-hiring arrangements that reduce visibility over the identity, employment conditions or lawful engagement of workers.

6. OPERATIONAL COMMITMENTS & DUE DILIGENCE

Knight FM is not currently a mandatory reporting entity under the Modern Slavery Act 2018 (Cth), based on its current consolidated annual revenue. The Company will periodically assess its reporting obligations, including where changes to consolidated revenue, corporate structure or applicable legislation may affect its reporting status.

Regardless of whether mandatory reporting obligations apply, Knight FM is committed to identifying, assessing and addressing Modern Slavery risks within its operations and supply chains and supporting the Modern Slavery compliance requirements of its clients where applicable.

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To support these commitments, Knight FM implements the following measures to reduce Modern Slavery risks across the Company and its supply chains:

- Mandatory Training: All Knight FM personnel must complete combatting modern slavery awareness training via the company learning management system upon onboarding, followed by annual refreshers.
- Supplier Due Diligence & Prequalification: Suppliers and subcontractors must complete a modern slavery Self-Assessment Questionnaire (SAQ) during onboarding and re-tendering. High-risk suppliers will undergo enhanced screening, including verification of business licenses, entity structures, and labour practices.
- Contractual Protections: Procurement and subcontract agreements must incorporate mandatory modern slavery compliance terms, including:
  - ✓ Express warranties requiring adherence to the Modern Slavery Act 2018 (Cth) and this policy.
  - ✓ Immediate notification obligations upon identifying any suspected slavery or exploitation incident.
  - ✓ Right-to-audit clauses granting Knight FM the authority to inspect site operations, wage records, time-sheets, and right-to-work verifications.
- Internal Audits: Knight FM regularly reviews internal human resources records, Fair Work award compliance, right-to-work visa validations (VEVO), and supply chain country-of-origin documentation.

7. MINIMUM LABOUR STANDARDS

Knight FM strictly requires the company, host employers, suppliers, and subcontractors to maintain the following minimum baseline standards:

- **No Forced Labour:** Work must be entirely voluntary; no bonded, trafficked, involuntary, or indentured labour is permitted.
- **No Child Labour:** No worker under the legal working age shall be employed, and young workers must not perform hazardous tasks.
- **Lawful Remuneration & Working Hours:** Workers must receive wages, overtime, allowances, leave and other employment entitlements in accordance with applicable laws in the jurisdiction in which they work. In Australia, this includes compliance with the Fair Work Act 2009 (Cth), National Employment Standards (NES), and any applicable modern award or enterprise agreement. Working hours must remain reasonable and comply with applicable legal requirements.
- **Workplace Dignity:** Safe, fair working environments free from harassment, discrimination, bullying, coercion, or intimidation.
- **Health and Safety:** Safe and hygienic workplaces applicable work health and safety laws
- **Migrant Worker Safeguards:** Equal pay and conditions for migrant workers; no recruitment fees or deposits may be levied against workers; and retention of original passports, work visas, or identity documents is strictly prohibited.
- **Clear Employment Terms:** All workers must receive a written employment agreement prior to commencing work, articulated in a language they comprehend, setting out terms, hours, and pay rates.

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8. REPORTING & GRIEVANCE MECHANISMS

Any suspected instance of Modern Slavery, exploitation or unethical labour practices involving Knight FM, a Host Employer, client, supplier, subcontractor or other party within Knight FM's supply chain should be reported as soon as practicable.

Employees may raise concerns with their direct manager, HR, the Head of HR & HSE, or another Eligible Recipient in accordance with the HR – Whistleblower Policy.

Contractors, subcontractor personnel, agency workers, suppliers and supplier personnel may also raise concerns directly with HR, the Head of HR & HSE, a Director, Officer or other Eligible Recipient identified in the HR – Whistleblower Policy. Reports may be made in person, by telephone or in writing.

Reports will be handled confidentially and in accordance with applicable whistleblower protections. Retaliation, victimisation or other detrimental conduct against a person who raises a concern in good faith will not be tolerated.

Where appropriate, concerns may also be reported directly to relevant regulatory or law enforcement authorities.

Where Knight FM becomes aware of suspected or actual Modern Slavery within its operations or supply chain, the matter will be assessed and managed in accordance with Section 9 – Victim-Centred Remediation.

Where serious or unresolved non-compliance may warrant termination of a business relationship, any decision to terminate will be subject to applicable contractual and legal requirements and must be approved by the CEO.

9. VICTIM-CENTRED REMEDIATION

Where modern slavery or unlawful exploitation is suspected or verified within Knight FM's supply chain or operations:

- **Prioritising Worker Safety:** The immediate physical safety, welfare, and confidentiality of the affected worker(s) is the company's primary focus. Knight FM will not take punitive steps that increase risk to victims.
- **Remediation Plan:** Knight FM will collaborate directly with the supplier or host employer to build an immediate Corrective Action Plan to remediate the harm (such as reimbursing unlawful recruitment fees, compensating underpaid wages, and restoring identity documents).
- **External Support:** Where severe violations occur, Knight FM will coordinate with specialist crisis services, law enforcement, or the Australian Federal Police (AFP) human trafficking response teams where appropriate.
- **Commercial Exit as Last Resort:** If a business partner is unwilling, uncooperative or unable to appropriately remediate identified exploitation within a reasonable timeframe, Knight FM may suspend or terminate the business relationship, subject to applicable contractual and legal requirements. Any decision to terminate the relationship must be approved by the CEO.

10. POLICY REVIEW

This Policy will be reviewed periodically to ensure ongoing compliance with legislative requirements, operational needs, and industry best practice.

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Knight FM may update this Policy from time to time to reflect changes in legislation, operational risks, organisational requirements, or continuous improvement initiatives.

11. RELATED PROCEDURES

Employee Handbook – Whistle Blower Policy

Supplier Code of Conduct

Subcontractor Assessment & Worker Verification Procedure

12. REFERENCES

Modern Slavery Act 2018 (Cth)

Modern Slavery Act 2018 (NSW)

Labour Hire Licensing Act 2018 (Vic)

Fair Work Act 2009 (Cth)

Criminal Code Act 1995 (Cth)

International Labour Organisation Conventions No. 29 and No. 105

Authorised by:

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