



KINETIC IT

Q-P04.01-S02

SUPPLIER

CODE OF

CONDUCT

30 THE ESPLANADE, PERTH

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1. PURPOSE

This Code of Conduct for Suppliers (**Code**) sets out the minimum ethical and operational standards of behaviour expected of all Kinetic IT Suppliers. This Code has been designed to ensure Kinetic IT's ongoing compliance with legal, regulatory and standards obligations to maintain health and safety, human rights, labour practices, environmental stewardship, supplier diversity, and the security, confidentiality, and integrity of assets that contain, manage or transfer information deemed of value to the business, which may be in hard copy or digital (**Information Assets**).

2. GENERAL REQUIREMENTS

2.1 COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers must comply with all applicable local, state, and federal laws, regulations, and industry standards in the regions where they operate. This includes, but is not limited to, labour laws, environmental regulations, privacy, anti-bribery and corruption (ABC) and data protection legislation.

2.2 ADHERENCE TO KINETIC IT POLICIES

Suppliers must adhere to all Kinetic IT policies; including, but not limited to, information security, privacy, data protection, and work health and safety regulations that have been identified as relevant to the Supplier.

2.3 CONFLICTS OF INTEREST

Suppliers must avoid any actual, potential or perceived conflicts of interest in their dealings with Kinetic IT. Suppliers are required to disclose any circumstances that may create a conflict of interest, whether direct or indirect, that could compromise their ability to act objectively or in the best interest of Kinetic IT.

Kinetic IT reserves the right to assess and take appropriate measures to mitigate any such conflicts.

2.4 SUB-SUPPLIERS

Suppliers are responsible for ensuring that their sub-suppliers and subcontractors also adhere to the standards set out in this Code of Conduct. Suppliers must communicate these expectations and monitor compliance to ensure that all parties within their supply chain uphold the same ethical, legal, and operational standards required by Kinetic IT.

3. INFORMATION SECURITY

3.1 ACCESS CONTROLS

Suppliers must only access areas, systems, and information they have authorised access to. Unauthorised access is strictly prohibited.

Suppliers must implement and maintain adequate access control measures to protect Kinetic IT's Information Assets from unauthorised access. Kinetic IT retains the right to conduct audits or request evidence from the Supplier to verify the effectiveness of the controls implemented to meet the requirements. Access to Information Assets must be restricted based on the principle of least privilege, ensuring that only the Supplier's authorised personnel have access as necessary to the Information System.

3.2 CONFIDENTIALITY & PRIVACY

Kinetic IT requires its Suppliers to protect the privacy of individuals, including but not limited to employees, customers, other trade partners, and the security of confidential assets and information. Suppliers must treat all

information shared by Kinetic IT in accordance with Kinetic IT's data labelling standard, including the respective security controls. Information that is labelled Confidential and/ or Restricted must not be disclosed to unauthorised individuals, or used for any purpose other than the agreed-upon purpose.

Suppliers must handle all personal information in accordance with Kinetic IT's Privacy Policy and all applicable privacy laws, including but not limited to the Australian Privacy Principles found in the *Privacy Act 1988 Act* (Cth).

Subject to the level of access and type of Information Asset being disclosed, the Supplier may be required to execute a separate confidentiality agreement with Kinetic IT.

3.3 RESTRICTION ON PHOTOGRAPHY AND RECORDING

Suppliers must not take photographs or videos within Kinetic IT premises unless expressly authorised by Kinetic IT. Any photography or recording must receive prior written approval from Kinetic IT, and must be conducted in accordance with any reasonable instructions provided by Kinetic IT during the approval process.

Suppliers must use secure methods approved in advance by Kinetic IT to share any information including but not limited to photographs or videos when required in due course of delivering the contracted services. Sharing images over unsecure platforms, e.g. WhatsApp, is strictly prohibited and would be considered a breach of Kinetic IT's security requirements.

Suppliers must immediately delete any unauthorised images or recordings and report the incident to the Kinetic IT Procurement Team (Procurement@kineticit.com.au).

3.4 INCIDENT REPORTING

If required by Kinetic IT, Suppliers must have an Incident Management Process in place to detect, report, and respond to information security incidents in a timely manner.

In the event of a suspected or confirmed security breach or other incident involving Kinetic IT Information Assets, Suppliers must immediately notify Kinetic IT and fully cooperate with investigation and remediation efforts.

4. PHYSICAL SECURITY

4.1 BUILDING INDUCTION

If the Supplier requires access to any Kinetic IT premises, they must familiarise and adhere to the obligations and requirements set out in the relevant Building Induction that will be provided to the Supplier separately.

4.2 PROPERTY PROTECTION

All physical assets, including equipment and documents, must be protected from theft, loss, or unauthorised use.

Suppliers are responsible for ensuring that all Kinetic IT provided equipment, and/or materials are properly safeguarded while in their possession. All equipment and/or material provided by Kinetic IT during the course of the contract must be returned to Kinetic IT at the end of the task, or contract, as applicable.



5. BEHAVIOUR & CONDUCT

5.1 PROFESSIONALISM

Suppliers must conduct themselves professionally, respecting personnel, property, and policies.

5.2 PROHIBITED ACTIVITIES

Suppliers must not engage in activities that could compromise security, such as sharing access credentials or leaving sensitive information unattended.

5.3 HEALTH AND SAFETY

Suppliers must follow all health and safety regulations to ensure their safety and the safety of others on all Kinetic IT premises.

5.4 BUSINESS ETHICS

Suppliers are expected to conduct their business with the highest standards of integrity and transparency. Suppliers must maintain honesty, fairness, and accountability in their interactions with Kinetic IT and other associated stakeholders. Suppliers must adhere to all applicable laws and regulations, prohibiting any form of corruption, bribery, or fraudulent activity, and ensuring that all business practices align with ethical principles. This includes, but is not limited to, the following:

ANTI-BRIBERY AND CORRUPTION

Suppliers must adhere to strict ABC standards in all business practices. Suppliers must not directly or indirectly offer, give, request, receive or tolerate any form of bribery, kickback, facilitation payment or other improper benefit in connection with their dealings with Kinetic IT or any other party.

Suppliers must comply with all applicable anti-bribery and anti-corruption laws and regulations and maintain appropriate policies, procedures and controls to prevent, detect and address bribery and corruption. Suppliers are expected to ensure that their personnel, agents, subcontractors and other representatives comply with these requirements and promptly report any actual or suspected breaches that may impact Kinetic IT.

GIFTS AND HOSPITALITY

Suppliers must exercise caution and sound judgment when offering or accepting gifts or hospitality in relation to their business interactions with Kinetic IT. Any gifts or hospitality must be reasonable, infrequent, and must not be intended to improperly influence business decisions or create a perception of improper influence.

Suppliers are expected to comply with applicable laws and Kinetic IT's policies regarding gifts and hospitality, and must report any instances where such exchanges may raise ethical concerns.

MODERN SLAVERY

Kinetic IT strongly opposes the use of modern slavery practices and is committed to working collaboratively with its Suppliers to reduce and eradicate the risk of modern slavery practices in its supply chains and throughout the business. Suppliers must comply with all relevant laws and ensure that no form of modern slavery exists within their operations or supply chain. Modern slavery encompasses practices such as human trafficking, forced labour, slavery, servitude, debt bondage, child labour, forced marriage, or the deceptive recruitment of workers for labour or services.

Kinetic IT encourages suppliers to implement monitoring and risk management processes to identify and address potential risks related to modern slavery.



ENVIRONMENTAL SUSTAINABILITY

Kinetic IT is committed to promoting environmental responsibility and expects its suppliers to minimise the environmental impact of their operations by following sustainable policies and practices.

Suppliers must comply with all applicable environmental laws and regulations, including requirements for environmental management and reporting. We encourage our suppliers to establish an environmental management system aligned with internationally recognised standards, such as ISO 14001.

INCLUSION, DIVERSITY & EQUALITY

Kinetic IT is committed to fostering a culture of diversity, equality, and inclusion that extends beyond our workforce to our relationships with suppliers. We actively seek to build mutually beneficial partnerships with small businesses, Indigenous-owned businesses, women-owned businesses, and enterprises owned by disadvantaged or disabled individuals. We believe that supporting diverse suppliers enriches our operations, drives innovation, and contributes positively to the communities in which we operate. We expect our suppliers to share this commitment to diversity and inclusion, treating all individuals and businesses with respect, fairness, and integrity.

6. MONITORING & COMPLIANCE

6.1 RECORDS RETENTION

Suppliers must retain any Kinetic IT data or records for the minimum period stated in applicable regulation or legislation, or as directed by Kinetic IT. Furthermore, suppliers must ensure all Kinetic IT data or records are securely destroyed or returned to Kinetic IT at the end of the contract, or when requested by Kinetic IT, or as required by law.

6.2 AUDITS, ASSESSMENTS AND INSPECTIONS

Suppliers must cooperate with Kinetic IT audit requirements and inspections to verify compliance with this Code and other applicable standards (e.g. ISO 27001, ISO 27002, ISO 14001, ISO 9001, DISP, IRAP).

6.3 TRAINING AND AWARENESS

Suppliers are required to participate in training and awareness programs as mandated by Kinetic IT, consistent with their respective roles. Furthermore, suppliers must ensure that their employees and sub-contractors receive the necessary level of training to effectively perform their duties and adhere to the principles outlined in the Code.

6.4 CONTINUOUS IMPROVEMENT

Suppliers are encouraged to engage in continuous improvement practices to enhance the quality, efficiency, and sustainability of their operations and services. This includes proactively seeking ways to innovate, adopt best practices, and improve processes in areas such as ethical standards, environmental impact, human rights, and labour practices.

Kinetic IT values Suppliers who demonstrate a commitment to evolving their operations in alignment with emerging standards and industry advancements.





7. COMPLIANCE WITH THE CODE

7.1 REPORTING VIOLATIONS

Suppliers must report any violations of this Code to the Kinetic IT Procurement Team (Procurement@kineticit.com.au).

7.2 CONSEQUENCES

Violations may result in termination of the contract, legal action, or other penalties as deemed appropriate by Kinetic IT.

8. REVIEW & UPDATES

This Code will be reviewed and updated at least annually to ensure ongoing compliance with all legislative, regulatory and other relevant standards requirements.

DOCUMENT CONTROL

This document may change without notice. The most current version of the Code is publicly available at: <https://kineticit.com.au/supplier-code-of-conduct/>





kinetic **IT**

1300 782 072
info@kineticit.com.au

www.kineticit.com.au