

ETHICAL SOURCING AND MODERN SLAVERY POLICY

1. Introduction

Dark Knight Engineering Group believes in gaining our client's trust, strengthening our supply chain and related businesses and having a positive impact in our communities and with the public.

Our Company is committed to working together with our suppliers to create long term successful futures for all parties involved.

We are committed to upholding human rights for DKE Group employees and the employees in our supply chain. Our ethical sourcing and modern slavery policy outline requirements from our suppliers. We also encourage our suppliers to consult with us with any challenges they face with regards to this so we can assist with ongoing improvements.

This policy relates to all countries where the supply chain takes place and not limited by the supplier's country of origin.

DKE Group respects and endorses the UN Guiding Principles on Business And Human Rights and is committed to incorporating these principles into our Company.

This policy highlights UN guiding principles, national and state laws. In cases where there are inconsistencies the principle or law with the greater protection would apply.

2. Our Minimum Requirements

2.1. No Child Labour

Suppliers shall comply with the national minimum age for employment and will not employ any person under the age of fifteen (15) years and they cannot have workers under eighteen (18) years perform night works. There must be documented procedures for young workers under eighteen (18) years. Suppliers must not stop a child the opportunity of attending school.

Note - Not all childrens' activities are considered child labour. Participation in activities which are seen as positive for the health, development or career prospects are not seen as areas to be addressed or eliminated.

2.2. Employment Freely Chosen (Not Forced)

All employees are to be provided with employment contracts they have freely entered into and do not contravene any legal or human right. There shall be no forced labour or associated types of coercive or indentured servitude. The employees are free to take a job and leave at any time. No financial guarantees shall be taken nor retain their original identity documents.

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2.3. Equal Treatment

There will be no discrimination of any type (age, race, sex etc.) and all employees are to be treated with respect and dignity.

2.4. Compliance With Laws

All employees are to be paid a fair wage which includes overtime, benefits and must meet all legal, national and industry standards. All legal requirements must be adhered to as a minimum requirement.

Employees are not required to work excessive hours and overtime work is always voluntary. There shall be no discrimination for declining overtime.

All laws regarding Workplace Health and Safety are to be adhered to and in cases where there is minimal guidance, the supplier shall enforce systems which are to prevent injury and accidents in the workplace.

2.5. Employment Freedom

Suppliers will not engage in bribery, favours or benefits which are seen as corrupt or that other interested parties in the supply chain would perceive as dubious. Suppliers will not enter into agreements which could be used as money laundering activities.

All employees are free to join unions or associations and can enter into collective bargaining agreements. Employees are also not to be intimidated or harassed when exercising their right to join or not join these groups.

3. Business Issues

3.1. Working Conditions

All employees shall be provided with a safe and hygienic working environment in which they can perform their work safely without being exposed to any hazard, accidents, and injuries. All necessary equipment shall be provided to the employees which will ensure their safety and security. Facilities, clean water, and toilets shall be available to them.

3.2. Conflicts

All conflicts with any dealings with DKE Group will be declared at the outset or the first opportunity. No gift or any benefit shall be accepted or offered from and to any entity which could be considered a bribe. Any information the supplier is aware of which is related to DKE Group and conflicts with fair business standards shall be reported through appropriate whistle blower channels.

3.3. Confidential Information

DKE Group and its suppliers shall not seek or use confidential information in relation to DKE Group, other suppliers, or competitor activities. No confidential information or intellectual property owned by DKE Group shall be shared with any third parties unless permitted in writing.

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3.4. Permitted Workers

Only persons who have a legal right to work in the supplier country are permitted to be employed or contracted by the supplier. Relevant legal employment documentation confirming employment status or capability must be provided and approved prior to any employment contract being offered.

4. Environmental Sustainability

All aspects of the supplier activities shall comply with national and state environmental laws and regulations. Disposal of production waste should be reviewed regularly to eliminate or minimise the impact on the environment.

Hazardous environmental activities shall be documented and managed according to legal requirements with the goal of reducing the impact on the environment.

Production waste shall be disposed of as per environmental laws and global standards.

The supplier will advise of any environmental compliance breach to DKE Group at the earliest opportunity.

5. Breaches And Remedies

Suppliers, employees, contractors, or any interested parties may raise a concern or non-conformance with DKE Group. This may be reported anonymously if allowed by law.

DKE Group will investigate all concerns and suppliers will provide transparency and assistance with relation to issues raised.

Suppliers and DKE Group will work together to address reported issues and document all corrective actions.

Approved by:

Megan McDonald

16th January 2023

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