



# Modern Slavery Statement

## Introduction

This Modern Slavery Statement (Statement) is published by Australian Terminal Operations Management Pty Ltd (ATOM) ABN 70 606 006 866 for the financial year ending 31 December 2022.

In this Statement, references to 'we', 'us' or 'our' refer to ATOM.

This Statement has been prepared in accordance with the Australian Modern Slavery Act 2018 (Act). It outlines the measures taken by ATOM to assess and address modern slavery risks in our operations and supply chains. Modern Slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. This includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour.

## About ATOM

ATOM specialises in managing all aspects of terminal activities for our customers ranging from the storage and handling of bulk liquid fuels to maintenance and engineering services.

## Structure

Formed in 2015, ATOM is a company incorporated in Australia with BP Australian Pty Ltd (BP), one of the largest oil & gas companies in the world owning 50% of shares, and UGL Operations and Maintenance Pty Ltd (UGL) a leading provider of end-to-end outsourced engineering, asset management, and maintenance services in Australia owning 50% of shares. ATOM does not own or control any entities and has not been included as part of BP or UGL Modern Slavery Statements.

## Operations

ATOM has 152 employees. ATOM has a Head Office in Melbourne and currently operates and maintains bulk fuel terminals across South Australia, Western Australia, Queensland, New South Wales, and Tasmania as per the below locations.

Location	Storage Terminals
South Australia	Largs North.
Western Australia	Esperance, Kalgoorlie, Kewdale, Kwinana, Geraldton, Port Hedland, Broome, and Nelson Point.
Queensland	Cairns, Townsville, Mackay, Gladstone, Gladstone Marine, Whinstanes, Bulwer Jet.
New South Wales	Newcastle.
Tasmania	Hobart, Burnie
Victoria	Newport (only pipeline demolition works)

The following is part of the terminal operations:

- Storage and handling of hydrocarbons.
- Unloading or loading of road/rail transportation.
- Pipeline receipt at terminals from other locations including other terminals and refineries.
- Tankship discharges and loading at seaborne locations.
- Product quality management in accordance with customer requirements and good quality management standards.
- Asset management and engineering maintenance and project delivery.

- Effective day-to-day Health, Safety, Security & Environmental (HSSE) management and control of work processes.
- Fuel Quality Assurance (including monitoring & testing).
- Compliance management including for a range of licences such as major hazard facilities environmental and dangerous goods.
- Risk management and verification processes.
- Consulting and auditing for fuel systems

Activity undertaken to pursue business objectives and strategy includes:

- Direct employment of workers which includes Terminal Managers, Site Managers, Wharf Operators, Safety Coordinators, Maintenance staff, Customer Support, Engineering, HSSE, HR, Finance, IT and Procurement staff.
- Provision and delivery of products for bulk liquid fuels.
- Leasing of property which includes leasing of equipment, motor vehicles, forklifts, and property.

## Supply chain

Our supply chain includes the products and services, including labour, that contribute to ATOM's own products and services and extends beyond direct suppliers. We have around 440 active direct suppliers who are all Australian based. When dealing with multinational companies as suppliers, the operations are Australian based. Third-party supplier expenditure was estimated at around \$57m in 2022 across the following categories:

- Products provided by suppliers which include engineering supplies, industrial supplies, first aid supplies and office supplies.
- Services provided by suppliers include:
  - Engineering services, and engineering operations and maintenance.
  - Building leases, vehicles, and equipment.
  - Recruiters, labour, construction specialities, Engineering contractors and training.
  - IT, Legal, Professional Services and Consultants.
  - Cleaning, food services, laundry, gardening, removalists, security, waste management.
- Products and services used by indirect suppliers in ATOM's supply chains.

## Risks of modern slavery practices in operations and supply chains

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. This includes trafficking in persons and forced labour. We have considered modern slavery risks within the context of our business, having regard to the nature of activities and supply chain as described above.

## Assessing modern slavery risks

We have assessed the risks of modern slavery in consideration of the below key factors.

Factor	Risk Assessment
<p><b>Sector and industry risks:</b> modern slavery risks because of the sector or industry's characteristics, products, and processes.</p>	<p>Sector and industry risks that have been identified as high are textiles, electronics, cleaning, and agriculture. This may be due to the use of unskilled labour or work undertaken at night-time or in remote locations.</p> <p>ATOM could be at risk of contributing to modern slavery practices through engaging with cleaning services and connected to modern slavery practices for the purchase of electronics for storage terminals.</p>

Factor	Risk Assessment
<p><b>Product and services risks:</b> modern slavery risks because of the way products and services are produced, provided, or used.</p>	<p>High-risk products identified globally include bricks, cobalt, cotton, and rubber. This may be due to the use of children or cost requirements.</p> <p>ATOM doesn't receive high-risk products. ATOM could be at risk of being connected to modern slavery practices if suppliers use high-risk products such as cotton used in staff uniforms.</p> <p>High-risk services identified include cleaning, services that involve lower wages and manual labour. ATOM could be at risk of contributing to modern slavery practices through engaging with services for cleaning, security, gardening, food services, removalists, and laundry.</p>
<p><b>Geographic risks:</b> modern slavery risks due to a country having poor governance, weak rule of law, conflict, migration flows and socioeconomic factors like poverty.</p>	<p>Our geographic risk is considered low as operations are based in Australia and suppliers are Australian based and we do not interact with countries reported to have a high prevalence of modern slavery by international organisations or NGOs.</p>
<p><b>Entity risks:</b> modern slavery risks due to an entity's poor governance structure, leading to poor treatment of workers.</p>	<p>Our entity risk for ATOM is considered low. We are a company incorporated in Australia with strong corporate governance and an independent audit opinion provided over our financial statements. Our internal policies include the Code of Conduct, Health and Safety Policy and Whistleblower Policy. Direct hires receive competitive salaries.</p> <p>ATOM could be at risk of contributing to modern slavery practices by working with suppliers, that may have poor governance structures or a record of treating workers poorly.</p>

Considering our assessment of modern slavery risks, we have identified the following areas of focus:

- ATOM working with suppliers where services are considered high risk including cleaning, security, gardening, food services, removalists, and laundry.
- ATOM working with suppliers where electronic equipment is purchased or used for storage terminals.
- ATOM working with suppliers where high-risk products are used such as cotton used for staff uniforms.
- ATOM working with suppliers that may have poor governance structures or a record of treating workers poorly.

We perform annual reviews to identify any risks relating to new products, suppliers, or entities.

### Actions taken to address modern slavery risks

ATOM has taken the following actions to assess and address the risks of modern slavery practices occurring in our operations and supply chains:

- ATOM has established a due diligence process which includes identifying and assessing actual and potential human rights impacts – this has been performed on existing suppliers for modern slavery risks.
  - ATOM has reviewed a list of active suppliers and categorised them into the type of services provided.
  - ATOM has performed a more detailed review of around 100 active suppliers that provide services for cleaning, security, gardening, food services, removalists, and laundry.
  - ATOM has performed a more detailed review of around 74 active suppliers that provide engineering supplies, industrial supplies and first aid/medical supplies.
- ATOM has established a remediation process to remedy situations where identified that may cause or contribute to modern slavery, as detailed below.

### Indicators of modern slavery

The following could be indicators of modern slavery for staff engaged by suppliers in high-risk services provided:

- Living at the workplace

- Underpaid or not paid at all
- Required to work excessive hours without compensation
- Confined or isolated in the workplace
- Guarded at work or in their accommodation
- Isolated in remote locations
- Managed by an intermediary or third party who holds or invests their money for them
- Subject to different or less favourable working conditions than other workers
- Appear to have been deceived about the conditions of their employment
- Not provided with contracts in a language and format that they can understand

## Supplier Assessment and Processes

The Contracts and Procurement Specialist is responsible for the supplier assessment process.

Our assessment of suppliers performed and ongoing for new suppliers where providing high-risk services or products includes:

- Review of publicly available information, this includes any adverse media coverage such as indicators of wage underpayments.
- Review of any public commitments by the entity for management of modern slavery risks.
- In consideration of services provided consideration if the amount of the payments could contribute to a supplier having unrealistic cost targets and delivery timeframes, leading to cheap labour.
- Where adequate information is not available then requesting information from suppliers to understand how they have addressed their modern slavery risks.

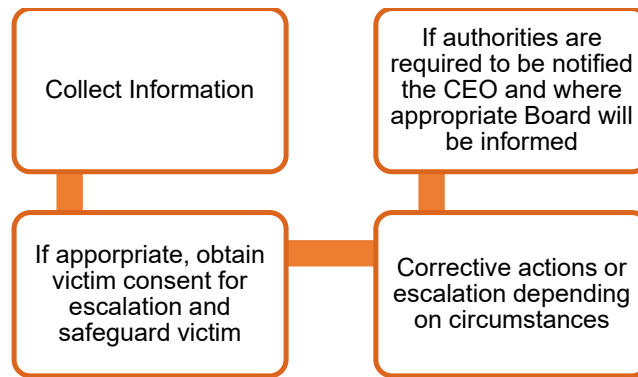
The following procedures apply to all employees, contractors, visitors, and suppliers and are integrated into training, induction, and orientation programs.

Document	Purpose
Code of Conduct	Establishes the standards that we uphold in the operation of our business by ensuring employees are aware of their rights and responsibilities. The code provides guidance as to the standard of personal behaviours expected of all employees, contractors, consultants, and suppliers.
Health and Safety Policy	Explains our commitment to providing and maintaining a safe and healthy workplace where all work activities are performed safely and with all possible measures taken to remove or minimise risks to the health, safety and welfare of employees, contractors, and others who may be affected by our operations.
Whistleblower Policy	Provides an avenue to report and address actual or suspected wrongdoing and to protect anyone who reports such incidents. We are committed to the culture of corporate compliance and high ethical behaviour in all aspects of the organisation. We recognise the importance of transparency and accountability in our operations.

## Remediation where modern slavery is identified

The Contracts and Procurement Specialist will be responsible for the investigation of any concerns raised and remediation processes. The response will depend on whether ATOM has been identified as causing modern slavery practices, contributing to modern slavery practices, or directly linked to modern slavery practices.

The framework to address identified instances of modern slavery is outlined below.



Corrective action may include:

- Where caused by ATOM disciplinary action for parties involved.
- Where caused by a supplier discussion with the supplier to remediate issues identified.
- Where appropriate termination of supply of products or services for the supplier involved. This will expect to be the case if the supplier refuses to address the issue and there is no prospect of change.

### Next steps

ATOM has committed to continuous improvement and has established a plan for future action in the next year which includes:

- Training will be provided to all staff about modern slavery risks, how ATOM manages modern slavery risks occurring in operations and supply chains and what to do if they have concerns about modern slavery risks.
- Once training has been provided to all staff, on an ongoing basis for new starters, modern slavery training will be provided as part of a staff induction process.
- Finalise the supplier assessment of suppliers providing high-risk services or products where additional information is required from suppliers.
- Annual independent review of checks performed over suppliers.
- Establish key performance metrics for reporting to the Board to assess and address modern slavery risks including compliance with supplier screening and completion of staff training and provide reporting for management of any incidents identified and remediation action taken.
- Publicly communicate what we are doing by publishing our Modern Slavery Statement on our website.

### Approval

The statement will be provided to the Australian Border Force for publication on an online central register before 30 June 2023.

This statement has been approved by the Board of Australian Terminal Operations Management Pty Ltd on 22 June 2023.

Michael Degotardi

Director of Australian Terminal Operations Management Pty Ltd

Date: 22 June 2023