



# Modern Slavery Statement



**ATOM**<sup>®</sup>

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## Modern Slavery Statement

This statement is provided by Aqua Terra Oil and Mineral Service and Supply Company Pty Ltd ACN 009 347 399 (ATOM) in accordance with the Modern Slavery Act 2018 and states the steps taken by ATOM to reduce modern slavery risks in our supply chain. This statement covers the year to 30 June 2020 and is issued on behalf of ATOM and its related bodies corporate and is approved by the Board of the respective entities.

ATOM is one of Australia's leading and fastest growing industrial and safety supply companies with over 40 years' experience serving Australian industry. We have a network of Industrial & Safety Walkthrough Warehouses, over 35,000m<sup>2</sup> of distribution capacity, and access to over 1 million industrial products from leading manufacturers and brands. Each year we're trusted to deliver more than 275,000 parcels to all corners of Australia, and offer both inventory management solutions and a team of industrial safety specialists to help our customers manage their "little things".



## OUR COMMITMENT

ATOM through our core ATOMite principles, Code of Conduct and related initiatives are committed to high standards of ethical behaviour from day to day business interactions to Community Engagement initiatives.

ATOM do not tolerate any form of human rights abuse, including modern slavery, and recognise the important role the business community has in protecting human rights and eradicating modern slavery and other human rights abuses.

ATOM acknowledges the responsibility we have in promoting ethical and sustainable business practices for not only ourselves, but all other stakeholders throughout our supply chains. Human rights is of significant importance to all of ATOM's employees, customers and communities surrounding the locations we operate in, and as such ATOM is committed to a journey of ongoing and continuous improvement to ensure the risk of modern slavery within our supply chains is minimised.

## OUR SUPPLY CHAIN

ATOM is a private company employing over 300 ATOMites in metropolitan and regional locations across Australia. ATOM engages with and purchases directly from a diverse range of suppliers to supplement our vast product offering, many of which source from and have manufacturing facilities internationally. In FY19 ATOM purchased products from over 3,000 different suppliers, reflecting the diversity of sourcing which occurs through our supply chain. Approximately 80% of purchases are made through ATOM's top 200 suppliers.

ATOM primarily sells within Australia to a range of customers and industries, but also has export capabilities supporting industry in various regions internationally.

As we source from a diverse and expansive supplier base, we recognise that there is a risk modern slavery exists in our supply chain due to both its complexities and the wide variety of products sourced from a large supplier base.

The risk of modern slavery is expected to be higher with some suppliers due to the size of their companies, industries they operate in, nature of their products and/or their geographical location, while lower in other suppliers who are based in Australia with local manufacturing.





## OUR APPROACH

ATOM is committed to eradicating modern slavery from our supply chain by seeking to do business with suppliers that are aligned with our values, ethics and environmental practices.

We set clear expectations of our suppliers to conduct business in a manner that is ethical and sustainable, and we make known our complete opposition to slavery in all forms. As a reseller, we purchase from reputable third party suppliers who are expected to operate in a safe and ethical manner whilst respecting human rights. We expect these suppliers, as manufacturers, distributors and service providers, to have policies and programs in place to address modern slavery risks within their own supply chain.

ATOM is committed to continuous improvement in the way we work with all of our stakeholders in relation to minimising the risks of modern slavery.

As part of our Supplier Assurance Programs, we engage our suppliers through our **Supplier Risk Assessment Questionnaire** which is to be completed by our top 200 suppliers, who represent 80% of all of our supply. These assessments are used to understand our suppliers' risk assessment process, their own policies, actions and commitments in relation to reducing the risk of modern slavery in their own supply chains. We expect this program to expand and be rolled out to suppliers representing the smaller end of ATOM's procurement spend, as well as being included as part of yearly major supplier discussions, and prequalification questionnaires for new suppliers. These activities are part of ATOM's proactive approach to managing the risks of modern slavery, and by working together with our suppliers we seek to drive higher levels of engagement and compliance across our supply chain in relation to these matters.

We know these actions have been effective when we receive high response rates and engaged participation within the submitted responses.



ATOM has implemented a **Supply Chain Assurance Committee** which has developed programs to assist in monitoring the risks of modern slavery, as well as training programs to assist ATOM employees in risk identification, including the review of responses from the Supplier Assurance Programs. The effectiveness of these programs will continue to be assessed to ensure risks are appropriately identified and actioned.

ATOM's Supply Chain Assurance Committee meets on a quarterly basis to review compliance activity undertaken on major suppliers, continue to explore ideas to refine our approach and to understand any feedback from members of the ATOM team, whose input on the subject is encouraged and greatly valued.



Our Management and Procurement team members receive training on ATOM's Modern Slavery Policy. Toolbox Talks have been held at our warehouses to promote awareness of ATOM's activities, and provide employees a chance to give feedback. All training materials and resources are available to employees who were either unable to complete the training initially or wish to refer back to refresh their knowledge.

On a local level, ATOM also has in place procedures and mechanisms available to all employees, including those in the supply chain, allowing them to ask questions and voice any concerns including but not limited to how we operate, employ, and impact the communities we operate in and how we may impact those who form part of our supply chain. We view this as an extension of the Truthfulness and Openness ATOMite principles which are key values of the business. Employees are welcome to report any concerns or issues anonymously, and we will take all practical steps to protect their identity.



Perform supplier risk assessments to better understand where our products are coming from



Work with our suppliers and encourage compliance in relation to our modern slavery expectations



Continually monitor the risks of modern slavery and listen to the feedback of our team

At ATOM, we understand that while we may not have control over how every individual supplier views or treats its role in eradicating modern slavery, we are proud to be involved in our own programs and complying with the Modern Slavery Act 2018. We see our participation as an important contribution to achieving the critical mass required to put such a significant human rights issue front and centre, and on the radar of companies and supply chain participants globally.

ATOM recognises that tackling modern slavery will require a sustained, ongoing and meaningful commitment, and will continue to work with internal and external stakeholders to address our role in minimising the risk across our supply chain.

The Directors of the entities covered by this statement reviewed and consulted prior to approving the statement.

**Jason Johnson**  
Chairman

**Mark Bishop**  
Director

8 March 2021