

**THE TEAM**  
Behind the Teams



# MODERN SLAVERY STATEMENT 2024

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AQUA TERRA OIL AND MINERAL SERVICE AND  
SUPPLY COMPANY PTY LTD (ATOM)

# ATOM

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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 outlines the steps taken by ATOM to monitor and reduce modern slavery risks in its supply chain. This statement covers the year to 30 June 2024 and is issued on behalf of ATOM and its related bodies corporate and is approved by the Board of the respective entities.

## OUR COMMITMENT

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ATOM does not tolerate any form of human rights abuse or violation, including modern slavery. We recognise the important role the business community has in reducing the risk of 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 for all stakeholders throughout our supply chains. Human rights are 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 chain is minimised.

# ATOM: THE TEAM BEHIND THE TEAMS

At ATOM, we are the team behind the teams, driving industry across Australia. What makes ATOM truly different can be summed up in one word:

## SERVICE.

From offering world-class supply chain solutions to delivering tailored support, we focus on service excellence that helps our customers thrive.

Although our capabilities are impressive:



### Employees

500+ ATOMites



### Warehouse Distribution Capacity

Over 36,000m<sup>2</sup>



### Branches

12 across Australia



### Products

Access to over 1 million



### Suppliers

Over 3,000 around the world



### Deliveries

508,000+ items per year



### Consignments

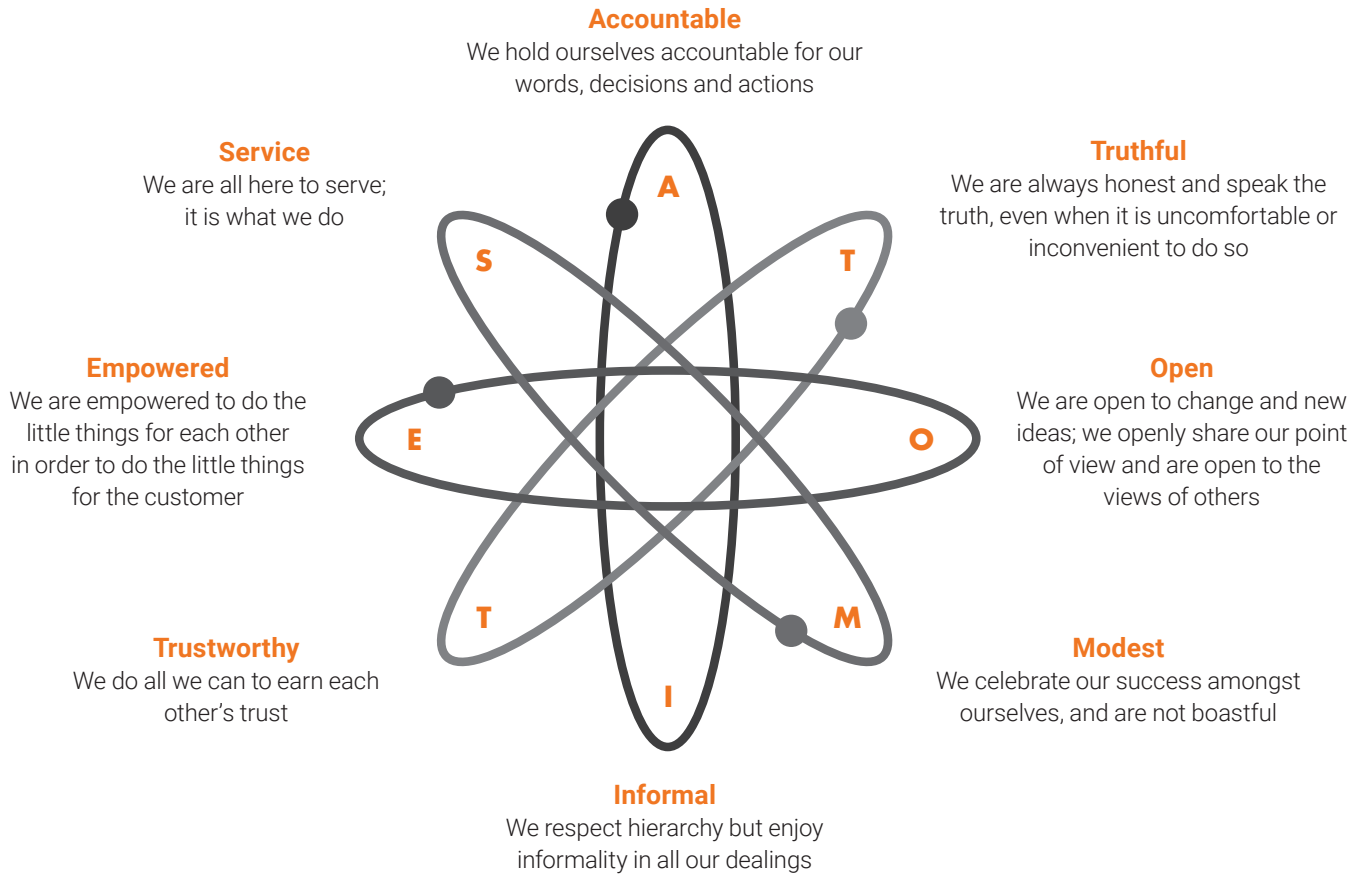
361,000+ per year

At ATOM, we don't just supply products — we support customer success every step of the way.

# ATOM: THE TEAM BEHIND THE TEAMS

## Our Values:

We are all ATOMITES



## Our Guiding Principle:

We do the little things for each other so the little things get done for our customers.

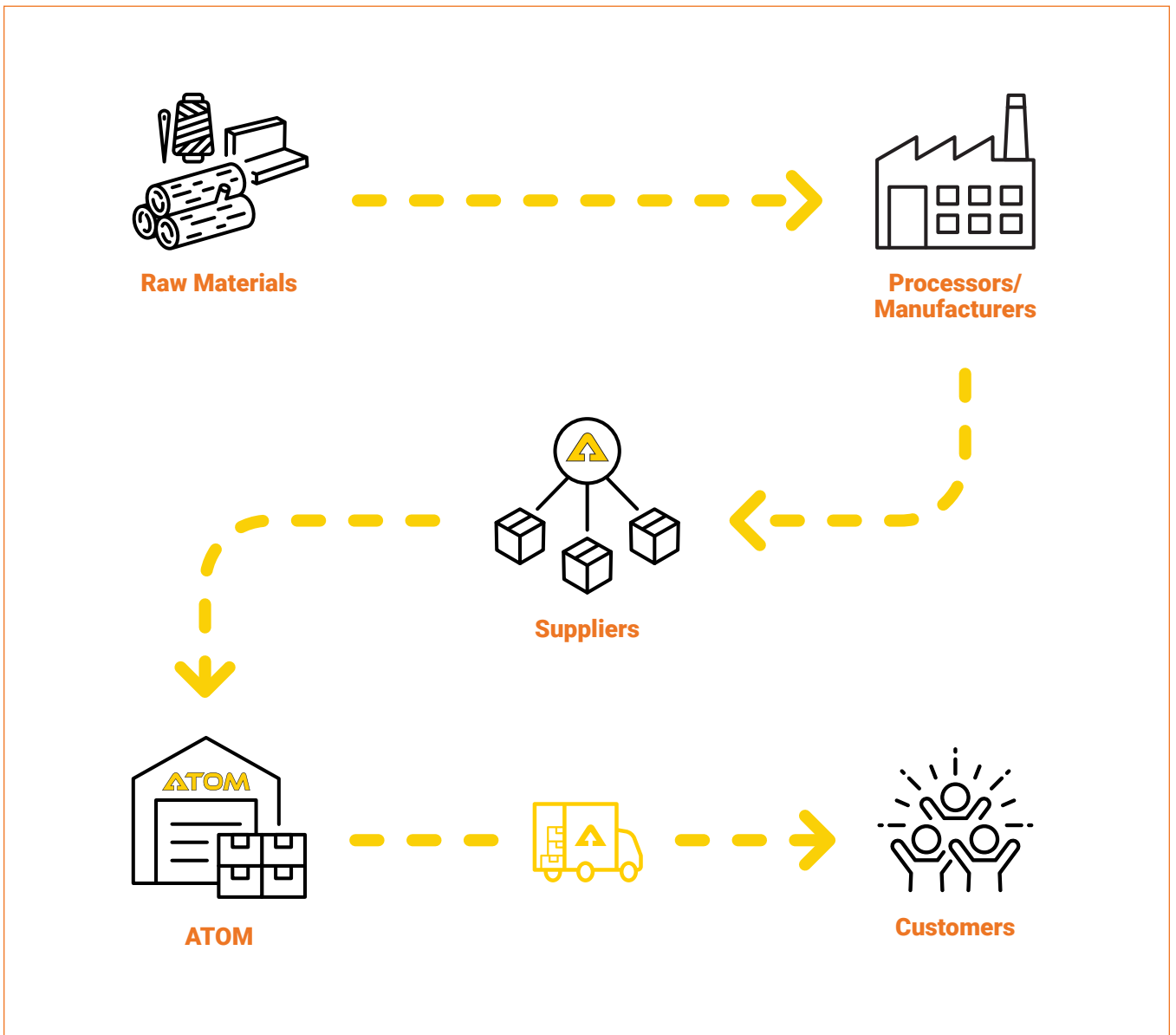
# OUR SUPPLY CHAIN

ATOM engages with and purchases directly from a diverse range of suppliers to supplement our vast product offering. Many of these suppliers source from and have manufacturing facilities in multiple locations internationally. In FY24 ATOM purchased products from approximately 3,000 different suppliers, reflecting the diversity of sourcing that 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 complexity 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, the geographical location of their manufacturing facilities as well as the complexity of their own supply chains, while lower in other suppliers who are based in Australia with local manufacturing and those who source raw materials and other inputs locally.

ATOM also engages suppliers for business support functions such as information technology, logistics, vehicle and material handling equipment maintenance, property services (including waste, cleaning, utilities and security), legal and accounting services and marketing. These suppliers are primarily within Australia and form a smaller part of ATOM's supply chain.



# MODERN SLAVERY RISKS

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Given the diversity and complexity of ATOM's supply chain, we acknowledge that risks of modern slavery may be higher among suppliers with overseas manufacturing facilities or extensive supply chains in high-risk regions. Risks may also be present in manufacturing and raw material extraction industries.



# ACTIONS TO ASSESS AND ADDRESS RISKS

## Supplier Engagement and Due Diligence

- **Prequalification Questionnaire:** All new suppliers must complete a comprehensive prequalification questionnaire, providing information on how they manage ethical sourcing, their policies on modern slavery, and their registration with platforms like Sedex to enhance supply chain transparency.
- **Sedex Registration:** ATOM have partnered with Sedex Global to help manage our ethical sourcing commitments. Sedex provides ATOM with an ethical platform where we can operate responsibly and sustainably. Sedex allows ATOM to maintain data on ethical & responsible practices in four key areas:
  - Health and safety standards.
  - Labour standards.
  - Environmental impact.
  - Business ethics.

In addition, Sedex is an accredited host of the SLCP (Social & Labor Convergence Program), which provides a joint assessment framework to improve working conditions in the global apparel and footwear supply chain.

- **Supplier Risk Assessments:** ATOM conducts risk assessments, prioritising engagement with our top 200 suppliers, representing 80% of procurement spend.

As part of the above we have conducted our own search of the Online Register for Modern Slavery Statements for ATOM's major suppliers, and reviewed these statements as a further step in understanding the risks in the supply chain and what actions others within the supply chain are taking.

ATOM has access to the audit program of one of its largest suppliers. These third party Ethical Trade Audits cover amongst other items, labour practices, living wages and benefits, freedom of association and freely chosen employment and are conducted at several factories of the supplier. Further audits were undertaken during FY24 as part of the routine audit program.

## Ongoing Supplier Engagement

- **Quarterly Business Reviews:** Post year end supplier QBR templates were further updated to emphasise Modern Slavery as a discussion point.
- **Modern Slavery Policy:** ATOM sets clear expectations for suppliers to uphold ethical and sustainable business practices and adhere to our Modern Slavery Policy.

## Employee Training and Awareness

- **Modern Slavery Course:** Procurement team members complete a modern slavery training course, covering:
  - What modern slavery is.
  - Types of modern slavery.
  - Responsibilities for addressing modern slavery.
  - Actions individuals can take to mitigate risks.

This training ensures employees understand modern slavery risks, can identify red flags, and contribute to mitigating these risks across our operations and supply chain.

- **Toolbox Talks:** Educational materials and discussions are shared with all ATOM branches to promote awareness and gather feedback on modern slavery initiatives.

## Internal Collaboration

ATOM's Supply Chain Assurance Committee consists of ATOM management from areas such as Procurement, Supplier Engagement, Finance and Contracts and assists in monitoring the risks of modern slavery, as well as identifying training opportunities to assist ATOM employees in risk identification. The Supply Chain Assurance Committee also reviews responses from the Supplier Risk Assessment Questionnaires and other supplier communications, where relevant. The effectiveness of these programs will continue to be assessed to ensure risks are appropriately identified and actioned.

## Effectiveness Assessment

To ensure our efforts effectively minimise modern slavery risks, ATOM measures:

- Supplier participation in prequalification and risk assessment programs.
- Feedback and engagement levels from suppliers and employees during reviews and training sessions.
- Results from audits, workplace condition assessments, and Sedex data reviews.

# ACTIONS TO ASSESS AND ADDRESS RISKS

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## Consultation and Governance

The Directors of the trading entities covered by this statement reviewed and consulted prior to approving the statement. The related bodies corporate also covered by this statement, which are in nature holding companies, are ultimately under the same directorship, or oversight, or executive management as ATOM and as such consultation occurs simultaneously for ATOM and its related bodies corporate.

## Ongoing Commitment

ATOM recognises that addressing modern slavery requires ongoing commitment and collaboration. We remain focused on enhancing our processes, engaging with suppliers, and raising awareness to uphold ethical standards across our operations and supply chain.

Looking to the future, we're making it our mission to strengthen connections with suppliers on SEDEX, a leading platform for ethical trade.

By working closely with SEDEX-certified suppliers, we're taking a proactive step toward gaining greater visibility into every stage of our supply chain. This commitment not only ensures ethical sourcing and sustainability but also empowers us to assure our customers that their products align with responsible practices.

ATOM is driving positive change across industries through collaboration, innovation, and a shared focus on transparency. Together with our supplier network, we're building a future where ethical and sustainable supply chains are the norm.



# ANNEXURE 1 – MODERN SLAVERY ACT 2018 (CTH) MANDATORY CRITERIA CHECKLIST

The table below indicates where information related to each of the mandatory criteria in section 16 of the Act can be found:

Mandatory Criteria	Page Number/s
a) Identify the reporting entity.	3 - 4
b) Describe the structure, operations and supply chains of the reporting entity.	5
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	7 - 8
e) Describe how the reporting entity assesses the effectiveness of these actions.	7 - 8
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	7 - 8
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	-



**Jason Johnson**  
CEO

24 December 2024



**Vincent Bonetti**  
Director

**ATOM**

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