



NIOA®

## Modern Slavery Statement

11 November 2024



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## 1 COVERED ENTITIES

NIOA Nominees Pty Ltd as Trustee for Bill Nioa Family Trust (ABN 11 646 964 149), is filing this Modern Slavery Statement (**Statement**) on behalf of NIOA Nominees Pty Ltd, an Australian, privately owned company.

NIOA Nominees Pty Ltd is part of a group of companies collectively described as the 'NIOA Group'. Whilst other entities within the NIOA Group do not meet the mandatory reporting criteria as prescribed by the *Modern Slavery Act 2018* (Cth), strategic decisions, compliance, and oversight is provided from the Group Office that are applicable to its Australia, New Zealand and US operations. As such, entities within the NIOA Group take a harmonious approach to mitigating the risk of modern slavery.

This Statement has been drafted in consultation with the relevant entities within the NIOA Group, set out below:

1. NIOA Munitions Pty Ltd (ABN 93 622 573 095).
2. Barrett Firearms Manufacturing, Inc. (a Tennessee Incorporated Company) ('**Barrett**'); and
3. NIOA New Zealand Limited (a New Zealand registered company).

This Statement has been reviewed and signed off by Mr Robert Nioa, who is the sole director of NIOA Nominees Pty Ltd, NIOA Munitions Pty Ltd, Barrett Firearms Manufacturing Inc. and NIOA New Zealand Limited. For the purposes of this Statement, any reference herein to the NIOA Group is a collective reference to NIOA Nominees Pty Ltd, NIOA Munitions Pty Ltd, Barrett Firearms Manufacturing, Inc. and NIOA New Zealand Limited. Any reference to NIOA is a reference to the reporting entity, NIOA Nominees Pty Ltd.

This is the fifth Statement for NIOA for the purposes of the *Modern Slavery Act 2018* (Cth) and relates to the financial year ending 30 June 2024.

## 2 NIOA GROUP'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### 2.1 STRUCTURE

NIOA is a long-established operator in the licensed firearms, weapons and munitions market, headquartered in Brisbane, Australia, with operations across Australia, New Zealand, the United States of America and the United Kingdom. NIOA's operations support Commercial and Sporting, Law Enforcement and Defence customers.

At the time of reporting, the NIOA Group has approximately 380 employees globally.

The NIOA Group has strategic fixed infrastructure investments in specialist weapons and munitions storage, maintenance, manufacture and logistics facilities, and specialised teams of professionals operating across all elements of the associated complex spectrum of operations, engineering, program management, manufacturing and support functions. These activities are supported through a network of business locations within Australia, New Zealand and the United States including Melbourne, Canberra, Benalla, Brisbane, Christchurch, New Jersey and Murfreesboro (Tennessee).

## 2.2 OPERATIONS (CAPABILITIES)

### 2.2.1 AU/NZ Sporting Market

NIOA is a major supplier of firearms, optics, ammunition and accessories to the Australian and New Zealand sporting markets, operating through a traditional linear business model by purchasing product from both domestic and overseas suppliers, and wholesaling to a network of licensed firearm dealerships, who in turn sell to licensed consumers.

### 2.2.2 AU/NZ Law Enforcement and Defence

NIOA's Law Enforcement and Defence division focuses on supplying Australian and New Zealand Defence and Government customers with a broad range of firearms, weapons, munitions product, manufacturing capability and associated maintenance, training, testing, engineering and through life support services.

### 2.2.3 Barrett

Barrett was established over 40 years ago and was acquired by NIOA in 2023. It is the world leader in large calibre rifle design and manufacturing. Barrett products are used by civilian sport shooters, law enforcement agencies, the United States (US) military and more than 75 US State Department approved countries across the world.

## 3 NIOA'S MODERN SLAVERY COMPLIANCE PROGRAM

### 3.1 MODERN SLAVERY COMMITTEE

NIOA's Modern Slavery Committee is the driver behind the modern slavery compliance program that is multifaceted in its approach to ensuring compliance across the Group through positive culture, policies and training, supplier due diligence and contractual obligations. In FY2023-24, NIOA's Modern Slavery Committee continued to meet regularly to monitor and champion compliance, and assisted with implementing the necessary plans and strategies to achieve our FY2023-24 modern slavery commitments. During the regularly scheduled meetings, the Committee also engaged in discussions regarding future planning and development for new compliance strategies to align with the growth of the business.

### 3.2 CULTURE

The NIOA Group's corporate values reflect the commitment to a culture of honesty, integrity, trust and respect, where safety is priority. The NIOA Group ensures all aspects of our business are aligned with a focus on safe and ethical conduct by ensuring our values form the basis of our *Codes of Conduct* (to which all respective employees are bound) and our *NIOA Business Partner Code of Conduct* (which outlines NIOA's expectations of business partners). The NIOA Group recognises its corporate responsibility for upholding and protecting human rights within its operations and within its global supply chain.

### 3.3 POLICIES and TRAINING

Corporate policies and procedures pertaining to modern slavery are readily available to NIOA staff. All employees, directors and officers are bound by NIOA's *Modern Slavery Policy*.

In FY2023-24, the Group Office reviewed its Anti-Bribery and Corruption and Whistleblower policies across the Group, and NIOA updated its mandatory modern slavery awareness training, focussing on the inclusion of NIOA specific and targeted content, creating a direct connection to our employees, increasing relevance and applicability for all undertaking the training. The Modern Slavery compliance program mandates annual refresher training for all employees and all new staff are required to complete the training during their on-boarding process.

### 3.4 CONTRACT TERMS

In 2023-2024 NIOA reviewed its standard contracting templates and supply partner agreements to ensure that the modern slavery principles previously enshrined into those agreements remained relevant, suitable and applicable to NIOA's ethical standards for business, including modern slavery identification and monitoring. Notwithstanding minimal adjustments required to be made to the suite of documents, NIOA was satisfied that the obligations imposed on suppliers and contractors properly and appropriately reflected its ethical standards in its contract terms.

### 3.5 KEY PERFORMANCE INDICATORS (KPIs)

NIOA continues to monitor its modern slavery compliance program using KPIs. Review of KPI performance is a standing agenda item for the Modern Slavery Committee.

### 3.6 SUPPLY CHAIN DUE DILIGENCE

Our supply chain incorporates a wide range of Australian and international companies, small to medium enterprises, large multinationals, and several original equipment manufacturers (**OEMs**). NIOA has over 520 suppliers within its direct supply chain, consisting of key strategic suppliers (**First Tier Suppliers**) supporting our Sporting, Law Enforcement and Defence sectors.

Over 80% of NIOA's corporate suppliers are based within Australia.

Barrett's supply chain consists of long standing, reliable vendors of raw materials and products supporting the manufacturing facility, with all First Tier Suppliers based in the United States. Since acquiring Barrett in 2023, NIOA has worked with Barrett to integrate Barrett's supply management framework with NIOA and facilitate cohesion across the Group's operations.

Following the establishment of NIOA's robust supplier onboarding framework in the previous reporting periods, NIOA continues to monitor its engagement with suppliers to consistently assess and mitigate any risks associated modern slavery and other risks within the supplier management process more generally.

NIOA's *Supplier Management Policy* and *Supply Management Procedure* drive an aligned approach to due diligence, coordinating all key functions within NIOA (Operations, Information & Communications Technology, Procurement, Legal and Compliance).

NIOA's risk assessment process has been developed by considering and managing risk factors for both First Tier Suppliers and lower tiers of the supply chain and contains further due diligence process by:

- obtaining a formal statement of compliance with modern slavery requirements from all suppliers;
- requiring a formal commitment to NIOA's *Business Partner Code of Conduct* from suppliers as part of our supply chain review and approval processes;
- adjusting terms and conditions in contracts where required;
- managing suppliers considered to have significant risk of modern slavery by reviewing and leveraging higher risk suppliers' own supply chains and identifying any inadvertent risks for NIOA; and
- incorporating preventative supply chain risk assessments within supplier assessment questionnaires.

In addition to the supplier screening process, NIOA is constantly exploring ways to expand and qualify a wider network of suppliers to provide for locally based procurement and manufacturing to support the delivery of its Australian Industrial Capability commitments.

## 4 MODERN SLAVERY RISK EXPOSURE

NIOA has assessed its operations across the NIOA Group and acknowledges the possibility for modern slavery risk to exist within Human Resources (**HR**), supply chain and manufacturing functions regardless of its commitment to monitoring and mitigating such risks. However, NIOA considers risk within its operations and first tier supply chain as minimal due to the rigor it applies to its own HR processes, internal training and first tier supply chain screening. The highly regulated and complex industry in which NIOA operates also supports a natural screening and monitoring of its conduct and that of its business partners.

### 4.1 WORKFORCE (OPERATIONS)

NIOA Group has policies and processes in place within its HR department governing all aspects of the employee life cycle. All HR policies and processes are legislatively compliant across Australia, New Zealand and the United States and are regularly reviewed and updated accordingly. On this basis, the NIOA Group assesses risk of modern slavery within its own employment practices as low.

## 5 ASSESSMENT

### 5.1 Past achievements (including FY 2023/2024 Achievements)

Since the introduction of the *Modern Slavery Act 2018* (Cth), NIOA has made strong progress with respect to the actions it takes to assess and manage its modern slavery risks. In particular, NIOA's key achievements including in the last reporting year are:

- Continuing to self-evaluate the performance of NIOA's supply chain due diligence program with the intent to improve and evolve as new and/or emerging modern slavery risks are identified;
- Creating a new training module that delivers awareness and risk management strategies for modern slavery directly relevant to NIOA's operations, ensuring continued applicability and suitability to NIOA and its operations;
- Reviewing the applicability and refreshing template contract clauses pertaining to modern slavery where required.
- Keeping informed and alert in respect of legislative reforms, regulations or guidance relating to the prevention of modern slavery in the jurisdictions in which NIOA operates to ensure that its framework remains effective and compliant.

Furthermore, no grievances or whistleblowing issues relating to modern slavery have been raised to date.

## 5.2 FUTURE COMMITMENTS

In reporting year 2024/2025, NIOA's modern slavery compliance program aims to:

- Refresh its supplier due diligence and screening process by collaborating with our offshore supply chain focusing on key compliance areas including modern slavery and updating control measures commensurate with the risk profile of each of these suppliers;
- Not only tracking but also reporting the number and nature of new contracts that incorporate and acknowledge modern slavery compliance; and
- Aligning our grievance practices with those set out in the United Nations Guiding Principles on Business and Human Rights.

## 6 DECLARATION & APPROVAL

This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Statement of NIOA for the financial year ending 30 June 2024.

This Statement was endorsed by the Executive Leadership Team on 8 November 2024 and approved by NIOA Nominees Pty Ltd (the principal governing body) on 11 November 2024, in accordance with the *Modern Slavery Act 2018* (Cth).



Robert Nioa

(Sole Director of NIOA Nominees Pty Ltd as Trustee for the Bill Nioa Family Trust ABN 11 646 964 149, NIOA Munitions Pty Ltd ABN 93 622 573 095, Barrett Firearms Manufacturing Inc. and NIOA New Zealand Limited)