

MODERN SLAVERY STATEMENT

Aptella Pty Ltd (formerly Position Partners Pty Ltd) has prepared this Modern Slavery Statement through consultation with key employees and suppliers. This Modern Slavery Statement covers the financial year ending 31 March 2025 and has been approved by Aptella's Board of Directors.

Who we are

We build business relationships by sourcing, deploying and supporting intelligent positioning solutions to enhance our customers' productivity.

Wherever you find surveyors, engineers, construction machine operators and contractors, Aptella is there to assist their work to be precise, efficient and in control.

Formed in 2008 by joining five state-based laser and machine control distributors, Aptella has now grown to a 250+ strong team with offices in every state and territory of Australia, along with New Zealand, Indonesia, the Philippines and Singapore.

Our people have a diverse skill set to enable the best outcomes for your project. We employ cadastral, engineering and mine surveyors, mechanics, electrical engineers, computer programmers, spatial sciences experts and more to ensure we have the know-how to source and tailor technology solutions to save on time, labour, wasted materials and rework.

Our business, structure, operations and supply chains

With over 300 people in offices in Australia, South East Asia and New Zealand, Aptella is the largest majority Australian-owned company focussing entirely on the distribution and support of positioning and geospatial solutions for surveying, civil works, mining and building projects. At Aptella, we are committed to increasing productivity for our customers and building lasting business relationships around high calibre positioning activities.

We partner with renowned international brands to cement an enviable portfolio of products, systems and software to suit almost any positioning task.

Aptella is Topcon's exclusive Australian Partner for Machine Control and Positioning Systems.

Aptella's supply chain is diverse and products are sourced from approximately 40 suppliers mainly located in the USA, Japan, Germany, Great Britain, China and Australia.

Policies and Procedures

Aptella's company values includes "Act with honesty and integrity" and "Build Trust and Respect". Associated signature behaviours call on all employees to comply with society requirements and not adopt unethical practices. In this regard, Aptella does not tolerate any association with slavery,



human trafficking, forced or child labour or exploitation. As an organisation, we understand the value that diversity and equal opportunity brings.

Aptella has several policies that enable us to comply with regulation, prevent unethical practices, ensure equal opportunity and underpin our duty to keep employees safe and well at work. These include a Quality Policy, a Whistleblower Policy, a Work Health and Safety Policy and a Modern Slavery Declaration that we ask our suppliers to complete. These policies are available to employees via the company intranet and are reviewed by the Executive Team to ensure alignment with legal obligations and ethical standards.

Suppliers are required to complete Aptella's Modern Slavery Declaration confirming compliance with relevant labour laws and absence of forced or child labour practices.

Risk assessment and mitigation and Supplier engagement

As part of our commitment to continuous improvement and transparency, Aptella has strengthened its monitoring and review framework to ensure our actions are both measurable and effective.

The following sections outline how we evaluate the effectiveness of our modern slavery risk management activities and the consultation processes undertaken with our controlled entities to ensure a consistent and group-wide approach.

Aptella recognises that assessing the effectiveness of actions to identify, address, and mitigate modern slavery risks is essential to continuous improvement.

To evaluate the impact of our initiatives, we have implemented the following measures:

- > **Supplier Monitoring:** Each financial year, Aptella will issue a *Modern Slavery Questionnaire and Declaration* to all active suppliers.
- > **Risk Categorisation:** Supplier responses are assessed and recorded in a central register, categorising suppliers as *low*, *medium*, or *high* risk, with no high-risk suppliers identified.
- > **Verification Activities:** Where travel or site visits occur, managers are required to observe workplace conditions and report any visible concerns relating to worker welfare or possible indicators of modern slavery.
- > **Internal Review and Oversight:** Results from supplier declarations and any audit findings are reviewed by the Audit and Risk Committee. This ensures board-level oversight and enables refinement of due-diligence procedures.
- > **Continuous Improvement:** Aptella tracks completion rates, emerging risk themes, and follow-up actions.

Through these structured monitoring and reporting mechanisms, Aptella can assess whether its actions are reducing exposure to modern slavery risk and can implement adjustments where effectiveness is limited.

Aptella operates offices in Australia, New Zealand, Indonesia, the Philippines, and Singapore. To ensure consistency and shared accountability across the group, consultation is embedded in the preparation of each modern slavery statement.



- > **Engagement Process:** Business Area Managers in each region confirm local employment practices, supplier engagement processes, and compliance with applicable labour laws.
- > **Review and Endorsement:** Findings from each office are reported to key stakeholders within the Leadership Team prior. Feedback is incorporated into the final statement to ensure that the risks and actions of each entity are accurately represented.
- > **Governance Oversight:** The Audit and Risk Committee and Board review the statement, ensuring that consultation outcomes from controlled entities are reflected in both the group-level risk assessment and planned future steps.

This structured consultation process ensures that all entities owned or controlled by Aptella contribute to identifying risks, evaluating actions, and shaping continuous improvement efforts across the entire organisation.

Our approach to prevent modern slavery

We recognise that as a significant purchaser of goods, we have a commitment to social justice, ethical practices and compliance. Continuous improvement actions ensure our processes remain effective in preventing modern slavery. The following measures are in place:

- > Continue to brief the Leadership Team, Board and Audit & Risk Committee annually on modern slavery risks, actions and outcomes.
- > Make all staff aware of the policy
- > Develop a declaration form and deploy to monitor and audit our suppliers
- > Designate key staff with responsibility to manage and implement further controls and due diligence within their area of the business
- > Regular review of our suppliers, including visits to supplier premises when possible.

Future steps

Aptella remains committed to addressing modern slavery risks. We will continue to improve our practices and policies, collaborate with stakeholders, carry out regular audits as well as support initiatives to mitigate risks associated with modern slavery practices.

Board Approval

On 14 November 2025, Aptella's Modern Slavery Statement for FY2024-2025 was approved by the Board, after reviewing the status of ongoing assessment of suppliers and Aptella's own employment policies.



Gregory Macklin
Chief Executive Officer
Date: 02 December 2025

