

BALVERONA PTY LTD

Modern Slavery Statement

Reporting period:

1-Jul-2020 to 30-Jun-2021

REVISION HISTORY			
Revision	Date	Issued For (Status)	Approved By
2021	16/5/2022	Final for approval	Roger Zagorski

CONTENTS

1 REPORTING ENTITY..... 3

2 STRUCTURE, OPERATIONS & SUPPLY CHAINS 3

2.1 STRUCTURE3

2.2 OPERATIONS4

2.3 SUPPLY CHAINS – OEM DISTRIBUTION4

3 RISKS 5

4 ACTIONS TAKEN 5

5 ASSESSING EFFECTIVENESS OF ACTIONS TAKEN..... 6

6 CONSULTATION PROCESS 6

7 OTHER INFORMATION – NEXT STEPS 6

8 REFERENCES 6

1 REPORTING ENTITY

This statement is published by Balverona Pty Ltd (ABN 002 826 173) and includes all subsidiaries (collectively now referred to as the Ateco Group) in compliance with Australia’s Modern Slavery Act 2018 (the Act).

Ateco Group respects ethical labor practices and has a zero-tolerance to any form of human rights abuses, including in our operations and supply chains, and we expect that all our employees, suppliers, contractors and agents uphold these values. Ateco Group is committed to respecting human rights throughout our business and will make every effort to operate our business and source our products and services ethically and responsibly.

In accordance with the Act, Ateco Group has implemented policies and practices to reduce the risk of modern slavery and other unethical behavior. This statement outlines the actions that Ateco Group has taken and will continue to take in our commitment to assess modern slavery risks within our operations and supply chain.

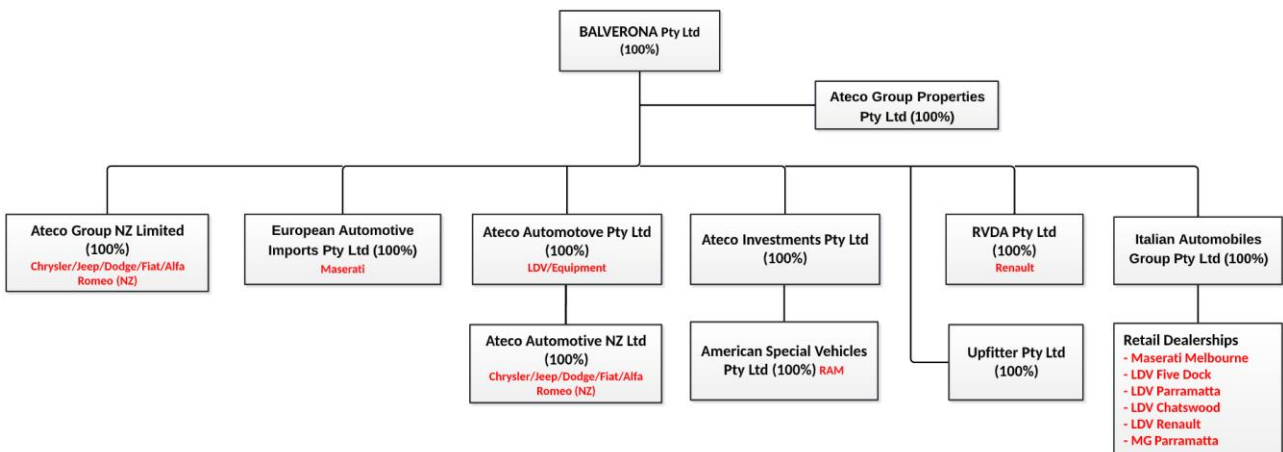
This is our first Modern Slavery Statement and has been approved by the Board of Ateco Group.

Roger Zagorski
Managing Director
17 May 2021

2 STRUCTURE, OPERATIONS & SUPPLY CHAINS

2.1 Structure

The following diagram shows the Ateco Group corporate structure including all active, separate legal entities.



2.2 Operations

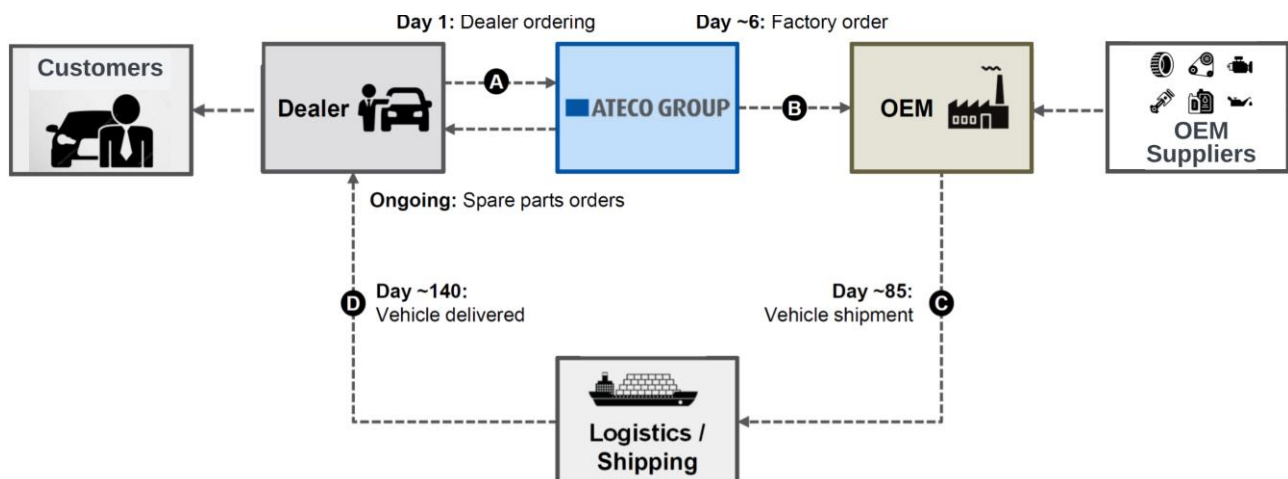
Ateco Group operations involves the importation, distribution and support of popular and premium automotive brands in Australia, New Zealand and South Africa. Here is an overview:

- Leading independent authorised automotive OEM strategic distribution partner in Australia and New Zealand
- Sold ~23,000 vehicles to wholesale markets in FY21
- Represents a diversified stable of leading OEM brands (LDV, RAM, Renault, Maserati, Jeep, Alfa Romeo, Fiat, BYD)
- Access to network of over 260 independent third party franchise dealers
- Servicing a car park of ~154,000 vehicles that continues to grow
- Online aftermarket Parts supply operation (Upfitter Pty Ltd)
- Equipment supply business
- ~200 employees across Australia and New Zealand
- In operation for nearly four decades
- Headquartered in Lidcombe NSW



2.3 Supply Chains – OEM Distribution

The following diagram outlines the supply chain for OEM distribution:



The following table provide a summary of suppliers by *product type* and *country of manufacture*:

SUMMARY OF PRODUCTS SOURCED BY COUNTRY/SUPPLIER/BUSINESS UNIT			
Country	Items sourced	Supplier	Business line
Belgium	Vehicles	Groupe Renault	Renault
China	Vehicles & Parts	SAIC	LDV
"	Leafsprings/VRS winches/coil springs	Yale	Equipment
"	Rolltops	KSC Pro	Equipment
France	Vehicles & Parts	Groupe Renault	Renault
"	Retarders	Telma	Equipment
Italy	Vehicles & Parts	Maserati sPa	Maserati
South Africa	Supersprings	Supersprings SA	Equipment
South Korea	Vehicles	Groupe Renault	Renault
Spain	Vehicles	Groupe Renault	Renault
Thailand	Shock absorbers	Profender	Equipment
USA	Vehicles & Parts	Stellantis	RAM
"	RAM & Silverado accessories	Various	Upfitter
"	Parts	MOPAR	RAM
"	Winches	WARN	Equipment
Vietnam	Snorkels	Airflow	Equipment

The top 20 Australian based product and service providers have also been analysed in our supply chain risk assessment, as follows.

3 RISKS

As part of ongoing governance activities, including quarterly group risk reviews, Ateco Group Management Team has conducted a detailed supply chain risk assessment. A brief overview of this process is as follows:

- Suppliers have been analysed by size (annual spend), product and service category, country of product manufacture
- Key suppliers were then assessed by:
 - Imported product risk
 - Country of manufacture risk
 - Local service provider risk

The risk assessment has identified the following:

- High value suppliers (i.e. all OEM's) have a relatively low risk profiles and well developed Modern Slavery policies and practices in place.
- Lower value local service providers including cleaners and car detailers potentially present limited risk. These businesses will be reviewed individually to assess the actual risk.

4 ACTIONS TAKEN

Based on our supply chain risk assessment, the Management Team has implemented the following actions:

- Any at risk suppliers will be required to undergo further assessment to verify the policies and procedures implemented to comply with the Act (or international equivalent). Where the risk remains, alternative suppliers will be sourced.
- Employee training in Modern Slavery has been implemented and will form part of our Employee Induction program. This is communicated through our 'Anti-Modern Slavery Policy'.
- Continued consultation with our suppliers and staff.

5 ASSESSING EFFECTIVENESS OF ACTIONS TAKEN

Ateco Group's Management Team will assess the effectiveness of the actions taken by ensuring that:

- 100% of our employees trained in our Anti-Modern Slavery Policy
- Annual re-assessment of our supply chain risk
- Continued assessment of and collaboration with our at-risk suppliers to ensure any supply chain risks are minimized or eliminated.
- This Statement is reviewed on an annual basis.

6 CONSULTATION PROCESS

Ateco Group maintains close relationships with all our stakeholders, in particular its employees, key OEM suppliers and local service providers. These practices are described in our corporate policies and procedures and include:

- How employees can report suspected cases of modern slavery risks
- How suppliers are involved where risks of modern slavery may be suspected.

7 OTHER INFORMATION – NEXT STEPS

Ateco Group will take the following steps to ensure effective compliance with the Act:

- Re-assess Supply Chain Risks on an annual basis
- Incorporate training and awareness of our Modern Slavery Statement into our employee induction program.

8 REFERENCES

APPENDIX 3: Methodology for identifying risk of modern slavery in products imported by the G20 (from GSI-2018_FNL_190828_CO_DIGITAL_P-1651977498.pdf)