



## MODERN SLAVERY STATEMENT 2021

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Revision No: 1  
Issue Date: 30/06/2021

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## 1. ABOUT THIS STATEMENT

This Modern Slavery Statement has been prepared in accordance with the *Modern Slavery Act (2018)* (Cth).

The reporting entities are:

- ATCO Gas Australia GP Pty Ltd (ABN 76 151 245 779) (for and on behalf of the ATCO Gas Australia Limited Partnership) (ABN 57 638 514 209), whose registered office is at Level 12, 2 Mill Street, Perth WA 6000
- ATCO Structures & Logistics Pty Ltd (ABN 71 083 902 309), whose registered office is at 55 Tonka Street, Luscombe, Qld 4207

together with their wholly owned subsidiaries as set out in section 5 of this document.

## 2. INTRODUCTION

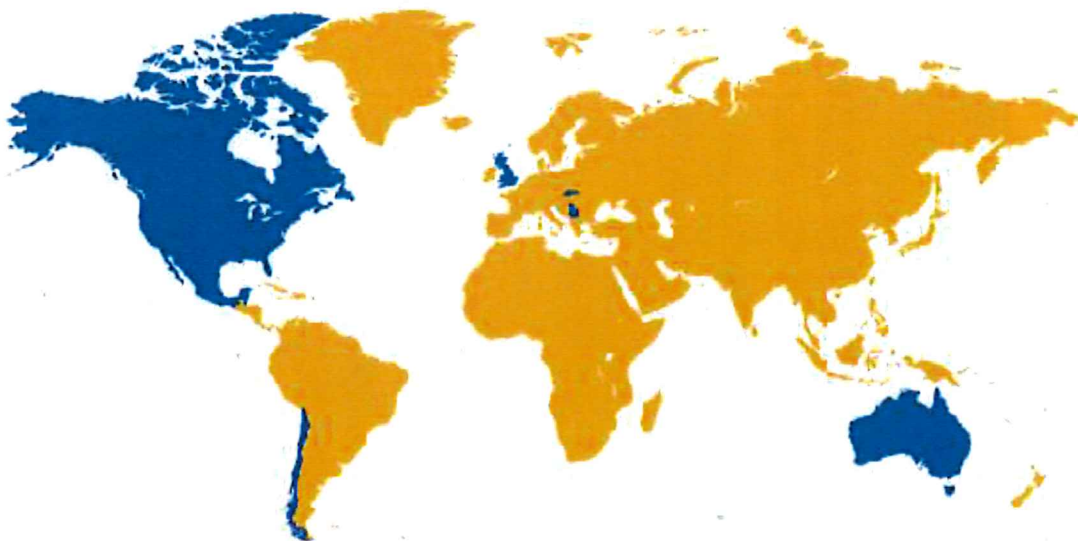
ATCO is committed to respecting human rights and acting with integrity in all of our operations and business dealings. One area of particular focus is modern slavery, which is an umbrella term for a number of serious exploitative work practices that represent violations of human rights.

This statement covers the reporting entities listed in section 5 (**ATCO Australia**) for the financial year 1 January 2020 to 31 December 2020. It provides an overview of the steps ATCO Australia is taking to prevent our involvement in human rights harm by positively influencing our supply chains and other business partnerships to act responsibly and ethically.

## 3. ABOUT US

### 3.1 ATCO Group

**ALWAYS THERE. ANYWHERE.**





### 3.2.1 ATCO Australia

This statement covers the following ATCO operations in Australia –

- a) ATCO Gas Australia, which owns and operates Western Australia’s largest reticulated gas network, with more than 14,000km of pipeline serving more than 760,000 customers.

Currently, more than 80% of the Perth metropolitan area is serviced by our underground network of pipelines and ready for connection of homes and businesses to natural gas.

ATCO Gas Australia operates a distribution network providing services delivering gas to our customers across the Perth greater metropolitan area (from Yanchep in the north to Mandurah in the south), as well as Geraldton, Kalgoorlie, Bunbury, Busselton and Albany in the regions.

The three main gas distribution systems operated by ATCO Gas Australia are:

- **The Mid-West and South-West Gas Distribution Systems (MWSWGDS)** - these natural gas distribution networks reach Geraldton, Eneabba, Bunbury, Busselton, Harvey, Pinjarra, Kemerton, Capel and the Perth greater metropolitan area including Mandurah. The MWSWGDS is a covered pipeline which can be a confusing term given all of our pipelines are situated underground. In this context however, a covered pipeline means it is subject to an Access Arrangement which is reviewed and approved by the Economic Regulation Authority.
  - **The Kalgoorlie Gas Distribution System (Kalgoorlie GDS)** – is a natural gas distribution network that serves the Kalgoorlie-Boulder area. The Kalgoorlie GDS is not a covered pipeline (again, the pipeline is situated underground) however it is not subject to an Access Arrangement; and
  - **The Albany Gas Distribution System (Albany GDS)** - a liquefied petroleum gas (LPG) gas distribution network that serves the Albany area. The Albany GDS is also not a covered pipeline and is not subject to an Access Arrangement.
- b) ATCO Structures and Logistics, which has been designing, manufacturing and installing modular building solutions across Australia since 1961, to a wide range of industries including mining, oil and gas, construction, education, healthcare, government and the commercial sector.

ATCO also provides turnkey lodge services including catering, housekeeping, retail, maintenance and utility services.

ATCO’s modular building solutions include offices, classrooms, accommodation units, lunchrooms, toilets, kitchen and dining facilities, recreation buildings, gyms and laundries.

ATCO also delivers outside-the-box, custom-designed buildings and villages for even the most specific requirements. With manufacturing facilities strategically located throughout Australia, ATCO can mobilise project needs quickly. With superior scale and speed, ATCO continually provides among the fastest deployment lead times available in the sector.

### 3.2.2 Power Generation and Energy Solutions

While not covered by this statement, ATCO's operations in Australia also include the following -

- **Power Generation** - Leveraging a legacy of over 70 years of power generation in Canada, ATCO has been providing gas-fired power generation in Australia for over 20 years. Through our two gas-fired power facilities in Australia, in Karratha, Western Australia, and Osborne, South Australia we supply the National Electricity Market (NEM) and the Western Australian Wholesale Electricity Market (WEM).
- **Energy Solutions** – ATCO is committed to identifying innovative energy solutions for customers that will further lower emissions and reduce costs. To help us do that, we have a range of research and development projects underway. As a customer focused organisation, ATCO is committed to identifying innovative energy solutions for our customers that lower costs and emissions. That's why we are developing a world class Clean Energy Innovation Hub with the support of the Australian Renewable Energy Agency (ARENA).

Our customers have clearly told us that renewable energy solutions are important to them, which is why we acquired Source Energy Co. in 2018 to further expand our reach into this key and emerging market. The work being undertaken by Source Energy Co is demonstrating the commercial viability of renewable energy solutions in shared occupancy buildings and is ATCO's first foray into providing our customers with renewable supported, micro grid solutions. The acquisition is part of ATCO's commitment to improving the customer experience by optimising the use of innovative technologies and solutions and ensuring customers can make informed energy choices.

## 4. OUR SUPPLY CHAINS

ATCO Australia delivers its services and solutions using a combination of our internal workforce, external suppliers, and contractors to ensure that activities, projects and work program resources are deployed efficiently and at the lowest sustainable cost, maintained over the long-term. ATCO's success is linked inextricably to the performance of our global supply chain.

### 4.1 How is ATCO Australia managing modern slavery risks

While modern slavery, which is characterised by low wages, excessive working hours, unsafe conditions, bonded labour contracts and trafficking, persists in regions where poverty rates are high, the rule of law is under-developed, and enforcement is absent or undermined by corruption, ATCO Australia recognises that with the globalisation of supply chains, it is exposed to the risk of modern slavery through the suppliers it engages.

ATCO Australia has developed a Human Rights and Modern Slavery Practice (the Policy) that outlines its commitment in respecting human rights and acting with integrity, and managing modern slavery risks within its supply chain. ATCO's commitment is also detailed in our "How We Do Business, Living the ATCO Values" ("How We Do Business"), which is an ATCO-wide code of conduct setting out the standards of conduct we expect of ourselves and our business partners.

In addition, ATCO Australia has a number of key procedures and practices (policies) which govern procurement and contracting processes and related business activities including:

- Procurement
- Conflicts of Interest
- Probity

- Anti-Bribery & Corruption
- Speaking Up (Whistleblower)

Each of these policies are referenced in “How We Do Business” code, and awareness and training in the policies is supported by compulsory on-line training modules for ATCO Australia employees.

These policies support the commitments “How We Do Business” code and the promotion of awareness and the means of reporting of concerns relating to actual, suspected or anticipated unlawful or unethical behaviour relating to ATCO Australia’s businesses.

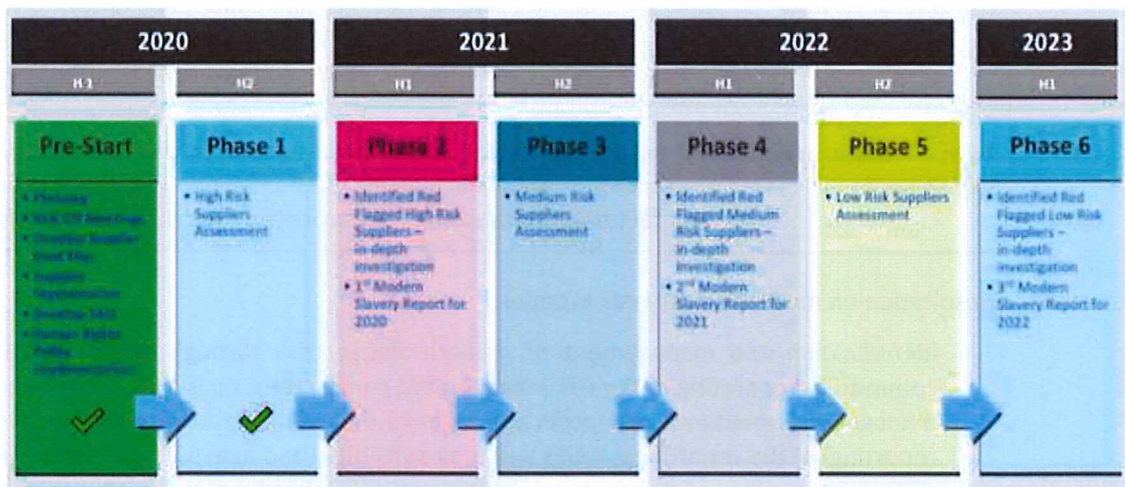
4.1.1 Due Diligence and Risk Assessment

ATCO Australia believes in working with business partners who demonstrate high standards of ethical business conduct. We expect them to be guided by the principles outlined in our policies and Codes of Conduct, and we will not knowingly work with business partners who operate unethically, unsafely or who violate the law, compete dishonestly or use unfair business practices.

When engaging with our business partners, we take steps to retain them on commercially reasonable terms and conditions and are aware of, and contractually bound by, our standards of business conduct. We carry out appropriate due diligence prior to engaging with business partners operating in high risk regions of the world and/or who perform high risk services on our behalf.

In 2019, ATCO Australia formed a Modern Slavery Working Group and completed a supplier segmentation exercise to categorise its suppliers into industry groups. Based on modern slavery risk assessment tools developed by industry groups, such as the Energy Procurement Supply Association, ATCO Australia has developed a vendor heat map to help assess the modern slavery risks in our supply chain. This has included the use of questionnaires to conduct risk-based reviews of our supply chain to identify and assess areas with potentially higher risk of modern slavery, taking into account industry type and location. The results of the risk assessments were visualised using a ‘traffic light’ system to identify which vendors were most at risk of having practices that equated to modern slavery within their business operations.

In 2020, ATCO Australia initiated a four-year strategic plan consisting of 6 phases to address modern slavery risks to the business. Within the succeeding phases, ATCO Australia will proceed to investigate in detail high risk suppliers, medium risk suppliers and finally low risk suppliers. Completion of the final phase will be completed before the end of 2023.



ATCO Australia has transitioned its vendor modern slavery due diligence and risk assessment process from an initial paper base to an online solution provided by EcoVadis.

The initial risk review undertaken in 2020 has identified that the modern slavery risk levels for ATCO Australia:

- are lower within business operations based on the location of labour resources and customers entirely within in Australia and the legal, regulatory and market practices frameworks in place in Australia
- are higher in materials and equipment supply chains, particularly given global commodity sourcing, manufacture and logistics (including maritime transport) from overseas countries (visibility of end-to-end supply chain practices)
- are moderate for some services categories (ranging from higher risk services such as cleaning and security (lower / unskilled labour) through moderate risk services such as IT and other off-shore support services (labour practices) and lower risk professional services such as legal and audit)

A summary of the key supply chain / spend categories and streams within each category is set out in the following table:

Key Supply Chain Categories	
Materials and equipment	Pipeline, fittings, valves, meters, vehicles (light and heavy commercial), parts, tools, fabrication materials (timber, metals, fittings), cabling, building materials (concrete)
IT	Software licences, hardware (servers and personal computing); support services, cloud services (including Software as a Service), telecommunications and data services
Support and Ancillary Services	Logistics (transport, courier and storage), safety and PPE supplies, security, cleaning
Professional Services	Legal, audit, tax, accounting, banking (including debt finance), engineering (design, construction), recruitment, training, meter reading, environmental (testing, laboratory and advisory), insurance, agency and contract staff services
Asset Construction and Maintenance	Field services (construction, repair & maintenance, emergency response, new connections), vegetation control, high-pressure gas mains surveillance, manufacturing, trades services (carpentry, electrical, civil, mechanical)

Consultation on modern slavery risk includes:

- identification and management of modern slavery risk through established Board risk committees; operating entity risk management committees; operating entity executive and management meetings; and reporting regimes (including internal audit and stewardship reporting) of the reporting entities and their subsidiary and associate entities in Australia
- raising awareness through training modules for employees
- review and updating of policies, procedures and practices to include modern slavery criteria



If ATCO Australia becomes aware of any evidence or information to suggest that one of our partners or suppliers is engaged in human rights harm or modern slavery, we will investigate, and where appropriate, terminate the relationship and report such practices to the responsible national or international authorities.

#### 4.1.2 Modern Slavery Awareness Training

To tackle and manage the risk of modern slavery, it is important that ATCO Australia's employees and contractors have the requisite knowledge and awareness of modern slavery practices and risks in the supply chain. In 2020, face-to-face training sessions were provided to the ATCO Australia executive team, and key business unit personnel involved in procurement activities were enrolled to complete a modern slavery awareness online training module. The online training module is being rolled out to the broader ATCO Australia employee groups during 2021.

## 5. REPORTING ENTITIES

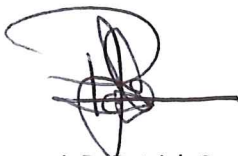
Below is a list of the ATCO entities in Australia covered by this statement -

- ATCO Gas Australia GP Pty Ltd (ABN 76 151 245 779) (for and on behalf of the ATCO Gas Australia Limited Partnership) (ABN 57 638 514 209)
- ATCO Gas Australia Holdings Pty Ltd (ACN 151 295 439)
- ATCO Technologies Australia Pty Ltd (ACN 151 386 015)
- ANetworks Pty Ltd (ACN 105 439 503)
- WA Network Holdings Pty Ltd (ACN 104 788 123)
- ATCO Gas Australia Pty Ltd (ACN 089 531 975)

ATCO Gas Australia Pty Ltd is the only operating company within the list of reporting entities above, and the consolidated revenue reporting entity is ATCO Gas Australia GP Pty Ltd (for and on behalf of the ATCO Gas Australia Limited Partnership).

- ATCO Structures & Logistics Pty Ltd (ACN 083 902 309)

This statement was approved by the boards of the reporting entities on 14 July 2021.



J. D. Patrick Creaghan  
Director  
ATCO Gas Australia GP Pty Ltd  
ATCO Structures & Logistics Pty Ltd

