

Australian Terminal Operations Management Modern Slavery Statement 2025

1 Introduction

This Modern Slavery Statement (**Statement**) has been prepared by Australian Terminal Operations Management Pty Ltd (**ATOM**) pursuant to the *Modern Slavery Act 2018 (Cth)* (**MSA**) in relation to the financial year ended 31 December 2025 (**Reporting Period**). This Statement describes the risks of modern slavery in our operations and supply chains, the actions we have taken to assess and address those risks in the Reporting Period, and how we seek to assess the effectiveness of our actions moving forward.

In this Statement, where we use the term “modern slavery risks”, we refer to the risk of harm to people arising from situations of exploitation such as forced labour, human trafficking, debt bondage, slavery and slavery-like practices (including the worst forms of child labour).

2 Our structure and operations

2.1 Company structure

ATOM (ABN 70 606 006 866) is an Australian proprietary company headquartered in Melbourne, Australia. We are a joint venture company, established in 2015 by bp Australia Pty Ltd (**BP Australia**) and UGL Operations and Maintenance Pty Ltd (**UGL**). BP Australia and UGL each hold 50% of shares in ATOM. ATOM does not own or control any subsidiaries.

BP Australia is one of the largest oil and gas companies in the world with operations spanning oil and gas exploration, production, refining, and marketing. UGL is a subsidiary of UGL Limited, specialising in end-to-end outsourced engineering, asset management, and maintenance services in Australia.

2.2 Overview of operations and activities

We are a terminal facilities operations company specialising in the operation and maintenance of fuel and energy terminals. We provide comprehensive services to BP Australia, to ensure safe, efficient, and environmentally responsible bulk fuel storage and handling solutions. We operate across 20 bulk fuel storage terminals in Australia.

In February 2025, Kwinana Bulk Terminal transitioned out of ATOM and by December 2025, it was no longer part of ATOM.



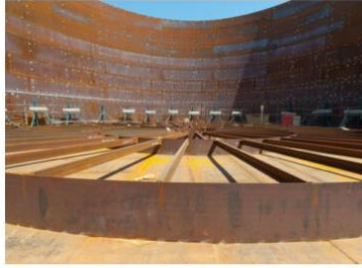
Our Services

An overview of our services is set out below:

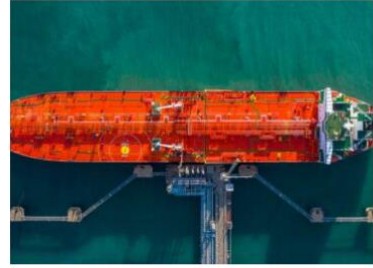
- **Terminal operations:** We provide services that handle all aspects of terminal operation including loading and unloading of products on behalf of our customer, providing storage tanks for various types of fuel, providing our expertise in managing and maintaining bulk fuel facilities, managing pipelines activities and ensuring quality control of stored products through regular testing and monitoring.
- **Asset management:** We offer maintenance services to optimise asset performance in hydrocarbon terminal operations. We provide services such as facility and equipment maintenance, undertaking due diligence services, providing advisory services in relation to increasing optimal facility performance, and undertaking risk-based inspection assessment for our customer to assess asset integrity and reliability.
- **Training:** We offer comprehensive training in fuel terminal operations and best practices for efficient terminal management to our customer.
- **Consulting and auditing:** We offer our expertise in fuel terminal operations and maintenance as consulting services to our customer who is looking to optimise processes, elevate safety standards and drive sustainability performance.
- **Capital project:** Our services include customised capital project solutions to enhance customer hydrocarbon terminal operations. We plan and manage infrastructure projects tailored to our customer's specific needs to drive efficiency, scalability, and sustainable growth.
- **Ship discharging and bunkering:** Leveraging our experience, we offer safe and reliable ship discharging and bunkering services to ensure secure and efficient marine operations.



Consulting and Auditing



Capital Projects



Ship Discharging and Bunkering



Terminal Operations



Asset Management



Training

Our Workforce

During the Reporting Period, ATOM employed approximately 140 people, with 138 working full-time and 2 on a part-time basis. Our employees perform roles across Australia, both operationally on-site and in desk-based roles in our head office.

The majority of our site workforce in our terminal facilities perform operational roles such as terminal managers and operators, shift operators, maintenance staff, permit coordinators, shift supervisors, health and safety, and customer support advisors.

Employees in our head office comprise corporate and management executives, engineering, human resources, finance, procurement, IT, business and project managers, data analysts, health and safety, as well as administrative staff.

Due to the specialised nature of our operations, the majority of our employees hold skills, training, and qualifications. Most of our workforce are employed by individual contracts with the exception of our workforce at our Kwinana terminal where most of our staff were covered by the ATOM Kwinana Terminal Operators Enterprise Agreement 2003 (the Agreement).¹ The Australia Workers' Union (AWU) was the bargaining representative for its members in the negotiation of the Agreement which came into effect from 9 October 2023. After the Kwinana Terminal was transitioned out of ATOM during the Reporting Period, there were no employees under the Agreement.

During the Reporting Period, there were no workers on a temporary visa. All of our employees are over the age of 18 years old.

¹ <https://www.fwc.gov.au/document-search/view/3/aHR0cHM6Ly9zYXNyY2RhdGFwcmRhdWVhYS5ibG9iLmNvcuUud2luZG93cy5uZXQvZW50ZlJwcmZWFncmVlbWVudHMvMjAyMy8xMC9hZTUyMTY5OC5wZGY1?sid=&q=australian%20terminals>



2.3 Our supply chain

During the Reporting Period, ATOM procured goods and services from close to 340 active direct suppliers.

UGL, continues to receive the largest proportion of our procurement spend during the Reporting Period. This was followed by labour providers providing personnel in roles such as rail operators, office administration, engineers, terminal administrators and operators, wharf attendants, tankship discharge and engineering project managers for onsite related activities as well as accountants, HSSE, and legal services providers supporting our office operations.

Other areas of procurement include:

- building leases, utilities, maintenance, gardening, security, removalists, pest control, waste management
- bund upgrades, fabrication of external pipe cross-overs and tank aprons, walkway installations
- vehicles, machinery, equipment
- cleaning, food services, laundry services
- office supplies and furniture, first aid supplies and equipment, PPE, corporate travel and hospitality
- freight and logistics

ATOM's relationship with its suppliers (approximately 91%) continues to be predominantly long-term and ongoing in nature.

Although the majority of our direct suppliers are located in Australia, their respective supply chains likely have global reach, particularly those that procure goods or services from the manufacturing and mining sectors.

3 Modern slavery risks in our operations and supply chains

3.1 In our operations

As noted in the Commonwealth Modern Slavery Act 2019 Guidance for Reporting Entities, modern slavery happens at the most extreme end of a spectrum that ranges from decent work to serious criminal exploitation. Workers may find themselves in modern slavery when they cannot refuse or cease work because of coercion, threats or deception.

Freedom from slavery is a fundamental human right. Accordingly, we have considered the potential for our operations to have caused or contributed to modern slavery in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

ATOM’s operations are only in Australia, which is considered to have a lower prevalence of, and vulnerability to, modern slavery according to the Global Slavery Index. However, we recognise that modern slavery still occurs even in lower-risk jurisdictions like Australia, particularly in industries where there are low barriers to entry and reliance on workers on temporary visas or with limited working rights. The risks may also be heightened in regional and remote areas.

However, the predominately skilled nature of our workforce combined with our compliance with Australia’s industrial relations laws and regulations and the wage levels within our business, means that there is a low risk of our operations causing or contributing to employees being enslaved and deprived of their freedom to terminate their employment. Child labour is not a risk within our operations because the youngest worker in the business is 19 years old, employed as a terminal operator.

3.2 In our supply chain

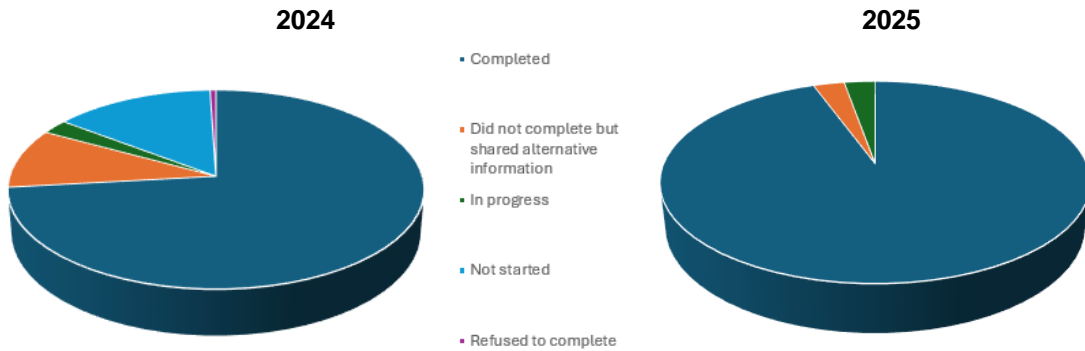
The risks of modern slavery are heightened in the sub-tiers of the supply chain of goods and services provided to us by our direct suppliers. In conjunction with our external subject matter experts, we have assessed the inherent risks of modern slavery in our supply chain by virtue of the following higher-risk categories:

Types of modern slavery	Driving factors	At-risk supply chain categories
Forced labour Debt bondage Human trafficking Deceptive recruiting for labour or services	<ul style="list-style-type: none"> • Vulnerable workers in price-competitive industries • Low barriers to entry • Workers on temporary visas, limited English proficiency and low awareness of workplace rights • Sham subcontracting, pyramid subcontracting, and labour hire arrangements • Reduced union access • High casual turnover • Power imbalances under employer-sponsored visa programs • Improper wage deductions and excessive working hours 	Cleaning services Laundry services Security services Contingent labour Waste management Food services Pest control Property maintenance Freight and logistics Construction materials sourced by engineers and contractors
Forced labour Debt bondage Human trafficking Worst forms of child labour Deceptive recruiting for labour or services	<ul style="list-style-type: none"> • Raw materials such as cotton, rubber, leather and silk are potentially produced by forced labour, including children • Lack of visibility in the provenance of raw materials • Vulnerable workers in price-competitive industries • Low barriers to entry • Complex subcontracting 	Personal Protective Equipment (PPE) and clothing Office consumables Furniture Industrial equipment IT hardware Construction materials sourced by engineers and contractors

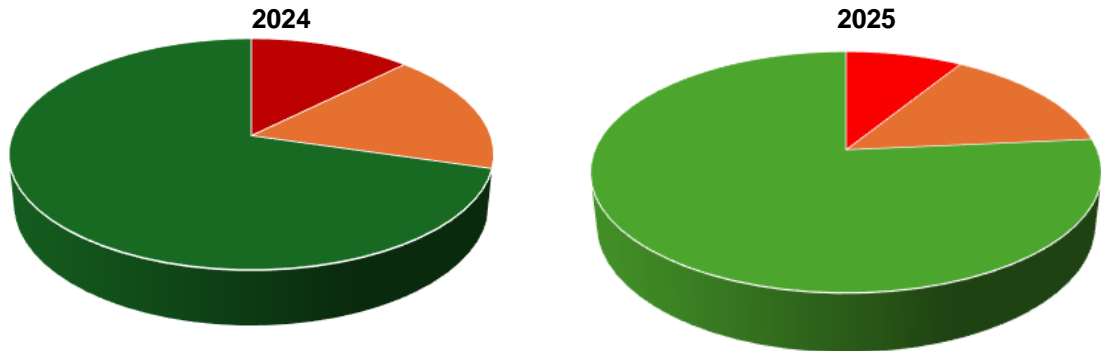
	<ul style="list-style-type: none"> • Impediments to conducting social auditing • Limitations on worker voice • Recruitment fees, document retention, indebtedness, and restrictions on workers' freedom of movement 	Vehicles, equipment and heavy machinery
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Overview of modern slavery questionnaire results

During the Reporting Period, we issued a modern slavery questionnaire (MSQ) to all active suppliers. The majority of suppliers sent the MSQ completed it. In 2025, we observed an improvement in the completion rate of the MSQ in comparison to 2024.



Based on the completed MSQ responses, approximately 76% received a low-risk rating, 15% received a moderate risk rating and 9% received a high-risk rating. In comparing the year-on-year results below, the distribution of ratings remained very similar. The average score out of 10 was 4 (low risk).



Based on the 2025 MSQ data, the majority of our suppliers are Australian SMEs operating in inherently higher risk industries.

- 97% of our suppliers are Australian businesses
- 65% of our suppliers operate in industries with higher inherent risks
- 85% of our suppliers are not reporting entities pursuant to the Modern Slavery Act

- 82% of our suppliers are small to medium sized enterprises

Of the suppliers that received a high-risk or moderate risk rating, the risks were driven by:

- the use of materials connected with heightened modern slavery risks, including glass (silica sand), steel and leather without having a responsible sourcing policy in place.
- operations in re-selling products manufactured overseas including workwear, furniture, floor coverings, vehicles and ICT.

No suppliers indicated that:

- they supply us with goods extracted, processed or manufactured, whole or in part in the Xinjiang Uyghur Autonomous Region.
- they supply us with goods from countries contained in the Bureau of International Labour Affairs List of Goods Produced by Child Labour or Forced Labour.
- workers or contractors on site have been required to pay a recruitment fee to anyone to secure work.
- workers on site have had to surrender passports
- workers are not free to join or form trade unions related to their work
- workers are not free to resign from their employment giving reasonable notice
- wage deduction is used to manage performance related issues

Approximately 38% of suppliers had minimal or no relevant policies or controls in place to mitigate the risks of modern slavery and did not have visibility in relation to their own supply chain risks. This is an area requiring uplift so that our suppliers are better equipped to understand the risks of modern slavery in their own supply chains.

4 Actions taken to assess and address modern slavery risks in our operations and supply chains

4.1 In our operations

In order to assess the risks of modern slavery in our direct employment of workers, we conducted a review of the roles performed by all staff and considered the lowest paid role within the business during the Reporting Period. The lowest paid role within the business was paid well above the minimum wage in Australia. In addition, employees are remunerated above the applicable award (Oil Refining & Manufacturing Award 2010) and this is confirmed every year via our annualised salary agreement checking requirement set by the award. The skilled nature of our workforce (96%+ are skilled) and the payment of salaries in accordance with relevant enterprise agreements, in excess of the minimum wage, confirmed our view of the risk being low.

Furthermore, by virtue of our 50/50 ownership by BP Australia and UGL, we are monitored for our compliance with their respective modern slavery/human rights policies.

As outlined in our previous modern slavery statements, our Code of Conduct and Health and Safety Policy continued to apply during the Reporting Period. We trained relevant employees in relation to modern slavery as part of the training on the Supplier Code of Conduct to raise awareness of the subject matter within our operations.

We also updated the Board during the second half of the Reporting Period on the progress of our 2025 goals as set out in our 2024 modern slavery statement.

4.2 In our supply chains

During the Reporting Period, we continued utilising the third-party due diligence platform and issuing the MSQ to all new suppliers during the onboarding. The platform assesses the modern slavery risks of a supplier based on five key risk factors: (a) jurisdiction; (b) industry; (c) product; (d) workforce characteristics; and (e) risk-mitigating measures implemented by the supplier. The analytics applied to the information gathered result in each supplier being assigned a modern slavery risk rating which then acts as a sieve to help us identify the suppliers that may require further engagement on potential risks.

We liaised with the suppliers that received high risk and the upper end of moderate risk ratings to discuss the results of the MSQ and to request further information regarding their supply chain and measures to mitigate modern slavery.

We also developed a Supplier Code of Conduct training, which was made available to all ATOM staff.

4.3 Remediation

ATOM’s Whistleblower Policy outlines the procedures to report actual or suspected instances of wrongdoing and sets out what disclosures may qualify for protection. The policy applies to any person associated with ATOM, such as a director, manager, employee, or contractor, as well as third-party individuals who supply goods or services to the organisation (and their employees), associates of the organisation, and relatives/dependents of these people.

ATOM treats whistleblower disclosures seriously. Our response to each disclosure is situation-specific. Where a disclosure requires an investigation, ATOM aims to do so promptly and thoroughly. We do not tolerate any acts of retaliation or detrimental conduct against anyone who makes a report or participates in an investigation of possible misconduct. Whistleblowers can make a report by contacting disclosure@australianterminals.com or using other reporting channels listed in the policy. ATOM’s Contracts and Procurement Manager is responsible for the investigation of concerns raised concerning modern slavery in our supply chain and remediation processes. The response will be informed by the UNGPs and our connection to the adverse human rights impact.

5 Assessing the effectiveness of our actions

We seek to assess the effectiveness of our actions by maturing our capabilities to assess modern slavery risks year-on-year. As shown in the table below, we have sought to refine our processes over the years to integrate modern slavery mitigation as part of our operations.

Goals for 2024	Status as at the end of the 2024 ⌚ in progress ☑ completed 🔄 ongoing	Goals for 2025	Status as at the end of the 2025 ⌚ in progress ☑ completed 🔄 ongoing	Goals for 2026
Provide bespoke training to personnel with a procurement function on the utilisation of the supplier due diligence platform.	☑	Inform and engage ATOM staff about the new Supplier Code of Conduct, ensuring awareness of the minimum standards that all suppliers must meet.	☑	Monitor and track the completion of ongoing training delivered to ATOM staff.

Roll out the third-party due diligence platform and issue the modern slavery questionnaire (MSQ) to suppliers. Develop a supplier code of conduct.	<input checked="" type="checkbox"/>	Embed the MSQ as part of the supplier selection process and new supplier onboarding.	<input checked="" type="checkbox"/>	Assess whether the integration of the MSQ in supplier selection and onboarding processes has been implemented consistently. Obtain staff feedback on areas for improvement.
Assess the results of the MSQ and identify the suppliers requiring further due diligence and engage with them on the identified risks and how they are managing those risks.	<input checked="" type="checkbox"/>	Engage with the suppliers that receive a high risk rating and assess whether further due diligence is required.	<input checked="" type="checkbox"/>	Continue engaging with the suppliers that receive a high risk rating and assess whether further due diligence is required.
Provide updates to the board on our progress against the 2024 goals.	<input checked="" type="checkbox"/>	Provide updates to the board on our progress against the 2025 goals.	<input checked="" type="checkbox"/>	Provide updates to the board on our progress against the 2026 goals and any changes to the Modern Slavery Act.
Publish our supplier code of conduct in addition to a modern slavery statement extract on our website.	<input checked="" type="checkbox"/>	Link the supplier code of conduct to the MSQ to increase awareness of the code and to track the number of suppliers that agree to comply with the code of their own comparable code.	<input checked="" type="checkbox"/>	Improve the visibility of the Supplier Code of Conduct across ATOM.

6 Approval

This statement has been approved by the Board of Australian Terminal Operations Management Pty Ltd on 12/3/2026 and signed by James Glenholme in his capacity as the chair of the board.

Signed by

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James Glenholme

Chair of Australian Terminal Operations Pty Ltd

Modern Slavery Act 2018 (Cth) Reporting criteria

Reporting criterion	Part
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	Part 2
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Part 3
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Part 4
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Part 5
6. Describe the process of consultation with any entities the reporting entity owns or controls	N/A
7. Any other relevant information	N/A