

MODERN SLAVERY STATEMENT

Aptella Pty Ltd formally Position Partners Pty Ltd has prepared this Modern Slavery Statement through consultation with key employees and suppliers. This statement 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.

Risk assessment and mitigation and Supplier engagement

Aptella's, own operations conform to local country employment laws and conditions. We assess our supply chain by requiring all suppliers to complete a questionnaire and modern slavery declaration, specifically targeting potential risks related to forced labour, human trafficking, and child labour within their operations. Our actions include the maintenance of a detailed registry of supplier responses. Our primary modern slavery risk lies in our reliance on the accuracy and transparency of supplier responses to our questionnaires and declarations. This risk is heightened with suppliers in regions where forced labour, human trafficking, and child labour are more prevalent. By actively assessing and prioritising these risks in higher-risk areas, we aim to strengthen oversight and reduce exposure.

All responses received from our suppliers are kept in a registry. To mitigate some of that risk, whenever our managers or supply chain personnel travel to a supplier's facility, they visit manufacturing, warehousing and offices. They are required to look for possible signs of modern slavery.

The Audit and Risk Committee are responsible for reviewing and providing oversight on behalf of the Board to assess any potential risks. By leveraging results from supplier audits and feedback mechanisms, we assess the effectiveness of our policies and actions. This process enables us to identify areas for improvement. Management and key personnel implement further controls as part of our commitment to continuous improvement and to enhance the effectiveness of risk mitigation efforts.

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:

- >** Provide briefing to the executive team, relevant employees, Board of Directors and the Audit and Risk Committee
- >** Make all staff aware of the policy
- >** Develop a declaration form and deploy to monitor and audit our suppliers
- >** Advise management and the Audit and Risk Committee of any risks.
- >** 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 28 November 2024, Aptella's Modern Slavery Statement for FY2023-2024 was approved by the Board, after reviewing the status of ongoing assessment of suppliers and Aptella's own employment policies.



Martin Nix

Chief Executive Officer and Managing Director

Date: 28 November 2024

