



ATCO

MODERN SLAVERY STATEMENT 2022

AUSTRALIA



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ABOUT THIS STATEMENT

This modern slavery statement has been prepared in accordance with the Modern Slavery Act (2018) (Cth), and approved by the governing body of the following reporting entities:

- ATCO Gas Australia Networks Pty Ltd (ABN 24 659 123 636), whose registered office is at Level 12, 2 Mill Street, Perth WA 6000
- Note: ATCO Gas Australia Networks Pty Ltd acquired the operating company ATCO Gas Australia Pty Ltd (ABN 90 089 531 975) on 7 December 2022, which resulted in a change to the consolidated revenue reporting entity during the reporting period from 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) to ATCO Gas Australia Networks Pty Ltd.

- 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 Appendix A of this document.

MESSAGE FROM JOHN IVULICH, COUNTRY CHAIR

Within ATCO, our pursuit of excellence governs how we act and make decisions. We strive to live by our values of Safety, Integrity, Agility, Caring and Collaboration – which underpin all of our decisions and activities, our behaviour as individuals and as a company, and what we say and do every day.

Core to our values is respect for each and every individual, no matter of who they are, what they do, or where they work or live. ATCO rejects any form of modern slavery, and is committed to taking action to positively influencing our supply chains and other business partnerships to act responsibly and ethically.

I am pleased to present this Modern Slavery Statement for 2022, which once again demonstrates ATCO's ongoing commitment to protect human rights and prevent modern slavery in our supply chain.

John Ivulich
Country Chair and Chief Financial Officer
ATCO Australia and ATCO Structures and Logistics





OUR JOURNEY TO DATE

2019

- The Modern Slavery Act 2018 (Cth) commenced on 1 January 2019 introducing a new statutory modern slavery reporting requirement for companies operating in Australia with an annual consolidated revenue of \$100 million or more.
- ATCO set up an internal working group and ran a pilot modern slavery assesment of selected suppliers.

2020

- ATCO published its new modern slavery policy.
- ATCO updated contract templates to outline the requirement for vendors to adhere to the Modern Slavery Act.
- We undertook manual risk profiling of suppliers based on indsutry group, location and spend.

2021

- ATCO published its first Modern Slavery Statement detailing its actions to mitigate the risk of modern slavery in its supply chains.
- ATCO partnered with an external CSR auditor to undertake detailed assessment of high risk suppliers.
- We developed an internal Modern Slavery training module and rolled it out to the Procurement.

2022

- ATCO completed an external independent assessment of its ESG practices to identify opportunities for improvement.
- We refined our risk screening process utliling CSR assement tool methodology.
- Detailed risk review utilizing the CSR platform of highest risk suppliers based on risk mapping
- Expanded Modern Slavery training to all employees involved in purchasing decisions.



ABOUT US

3.1 ATCO Group

ATCO Australia is part of the ATCO Group of Companies (ATCO) with diverse products and services across many industries, and is a one-stop provider of integrated energy, housing, transportation and infrastructure solutions. With approximately 6,200 employees and assets of \$22 billion worldwide, ATCO offers comprehensive solutions and service excellence, having worked in more than 100 countries around the world in:

- **Structures & Logistics** — workforce and residential housing, innovative modular facilities, construction, site support services, workforce lodging services, facility operations and maintenance, defense operations services, and disaster and emergency management services.
- **Utilities** — electricity and natural gas transmission and distribution.
- **Energy Infrastructure** — electricity generation, energy storage and industrial water solutions.
- **Retail Energy** — electricity and natural gas retail sales.
- **Transportation** — ports and transportation logistics.
- **Land and Development**

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 Appendix A (Reporting Entities) for the financial year 1 January 2022 to 31 December 2022. 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.

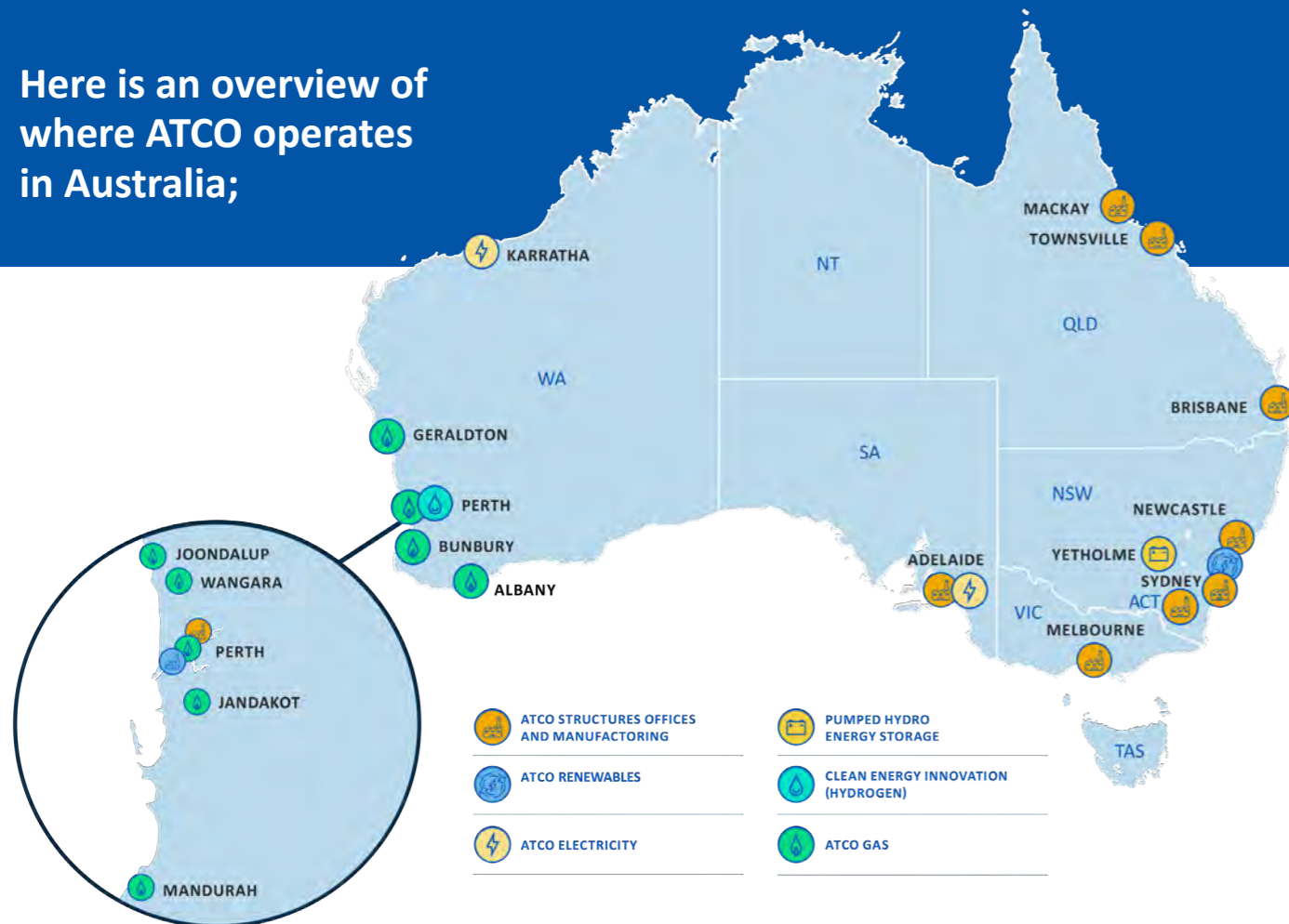


ATCO IN AUSTRALIA

3.2 ATCO in Australia

ATCO has been proudly operating in Australia for over 60 years, giving us a deep understanding of the local environment and allowing us to become a trusted, long-term partner of many large and respected Australian companies.

Here is an overview of where ATCO operates in Australia;



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 around 800,000 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 Energy Infrastructure

While not covered by this statement (due to their smaller turnover), ATCO’s operations in Australia also include the following -

- **Power** – 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 Western Australian Wholesale Electricity Market (WEM), and the National Electricity Market (NEM). The Osborne Cogeneration Power Station is a joint venture between ATCO and Origin Energy.
- **Renewables** – 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 have developed a world class Clean Energy Innovation Hub (CEIH) in Western Australia with the support of the Australian Renewable Energy Agency (ARENA). The CEIH generates renewable hydrogen through solar-powered electrolysis, and was a significant step in Western Australia’s moves towards a hydrogen economy. ATCO is currently working the Central West Pumped Hydro Project in New South Wales, which is in the early stages of project assessment and development. When completed, the project will store energy during periods of surplus electricity generation and generate energy during period of high demand using the stored energy under a daily cycle regime.

OUR VALUES

Our history includes a long-standing commitment to business excellence in all areas. Our values portray who we are and include a commitment to integrity and ethical business conduct. In today's business environment, living our values is critical for our continued success. Our values guide the conduct of all employees, officers and directors. We seek out business partners who share them as well. It is important that all members of our team embrace these values as they are fundamental to how we do business.

We live by the following values:



SAFETY

Safety is the first consideration in everything we do. We hold a shared belief that safety must direct all our day-to-day priorities and decisions, and we are accountable for understanding and following the health and safety requirements for any work we undertake.

CARING

We care about our customers, our employees and their families, our communities and the environment. We seek to understand and care enough to challenge each other.

COLLABORATION

We work together, share ideas, recognize the contribution of others and learn from our failures and successes. We are clear about our intentions and communicate openly especially when problems or issues arise. We value and encourage diversity and different perspectives. We work together to build strong networks.

AGILITY

We are creative, innovative and take a measured approach to opportunities and risk, balanced with a long term perspective. We stay relevant, reward action and learn from failure.

INTEGRITY

We are honest, ethical and treat others with fairness, dignity and respect. We make good decisions, take personal ownership of tasks, are responsible for our actions and deliver on our commitments.



GOVERNANCE

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 and business partners we engage.

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.

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, and the means of reporting concerns relating to actual, suspected or anticipated unlawful or unethical behaviour relating to ATCO Australia's businesses.

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 on-line training modules for ATCO Australia employees involved in procurement decisions. The Speaking Up (Whistleblower) policy and the "How We Do Business" code were reviewed and updated in 2022 to include ATCO's commitment to prevent modern slavery in our supply chain.

4.1.1 Consultation

ATCO Australia has established a working group consisting of representatives from the reporting entities to develop and implement the modern slavery risk treatment actions as set out in this modern slavery statement, and the working group consulted with the Executive Teams of the reporting entities in the development of this modern slavery statement.

OUR PEOPLE

We are committed to fostering an environment where internationally proclaimed human rights are respected and protected. We prohibit all forms of slavery, compulsory and forced labour, human trafficking and child labour in our operated business activities.

Our approach to human rights is based on the United Nations (UN) Universal Declaration of Human Rights and we respect human rights in accordance with the UN Guiding Principles on Business and Human Rights.

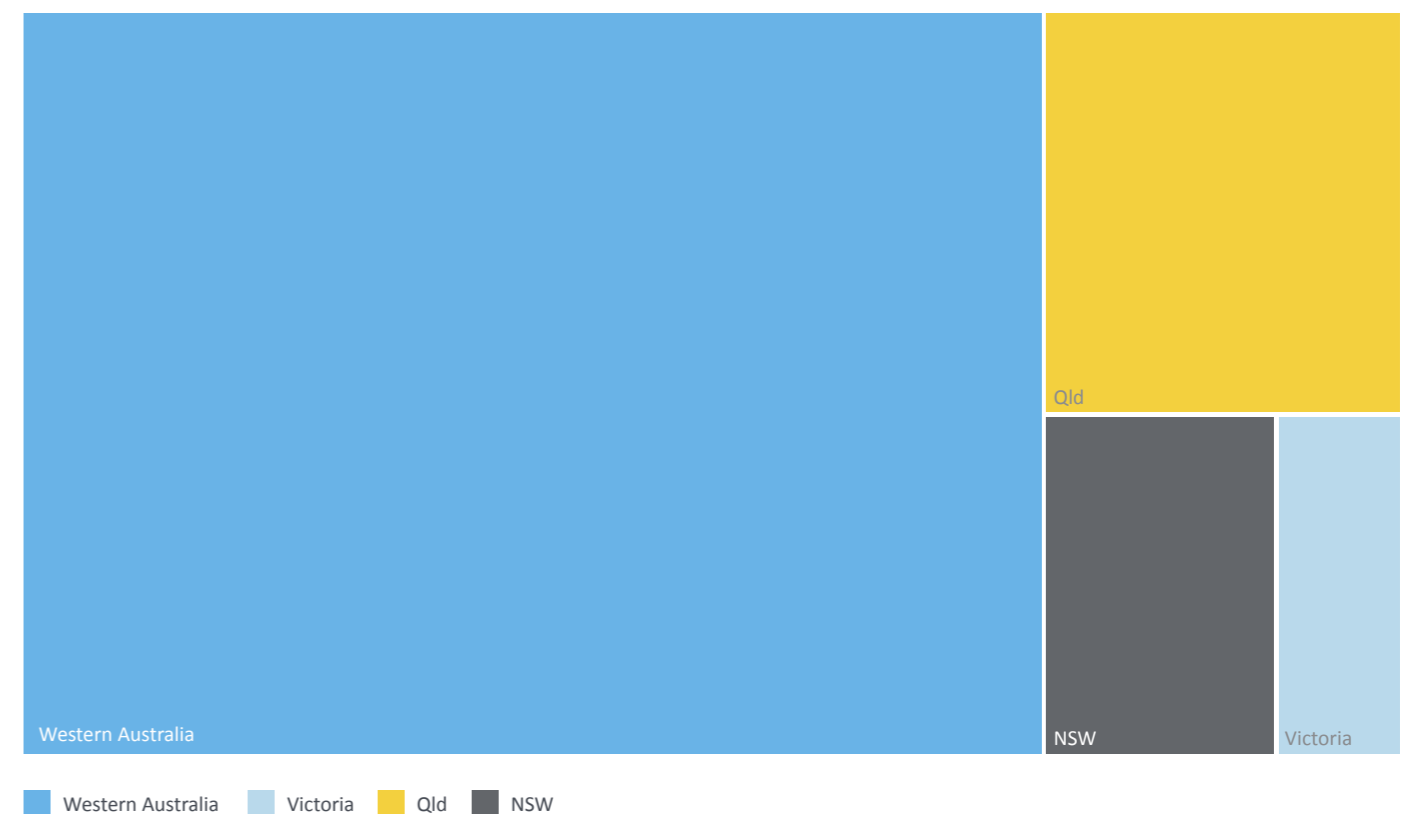
We ensure that we comply with all relevant employment legislation and policies that govern our operations. The integration of industrial relations and human resource management with our business strategies, values and culture ensures that every person who is employed by us is treated fairly.

We employ approximately 732 employees on a full-time, part time and fixed term basis across Australia. The majority of our workforce resides in Western Australia, and are employed by ATCO Gas Australia. In addition to adhering to all applicable sector awards and legislation, ATCO Gas Australia has also developed and agreed an Enterprise Agreement with its field technicians in 2022.

We are proud of our diverse workforce with female representation currently at 33%. Our ultimate DEI vision is to foster a community where everyone can bring their whole selves to work and reach their full potential.

To keep ourselves accountable, ATCO has made a number of social commitments to further promoting diversity, equity and inclusion in the workplace as part of our 2030 Environmental, Social and Governance (ESG) targets. To read more about ATCO's 2030 ESG targets, and our progress so far - Read more in our [2022 Sustainability Report](#).

Table 1: employee representation by State



Qld

Western Australia

NSW

Victoria

Western Australia Victoria Qld NSW

OUR SUPPLY CHAINS

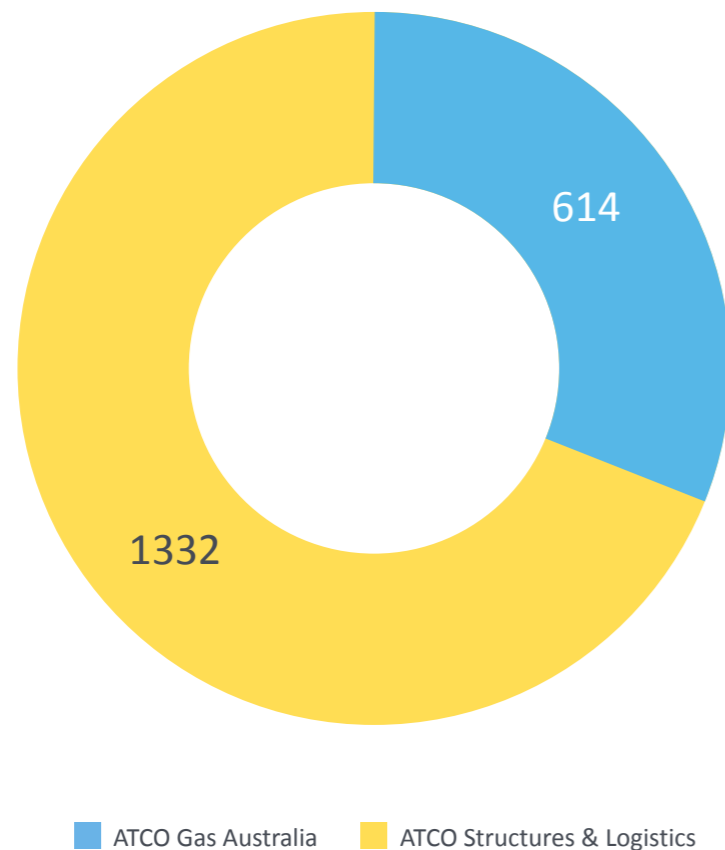
ATCO delivers its services and solutions using a combination of our internal workforce, external suppliers, and contractors to ensure that activities, projects and work program resources are deployed efficiently and at the lowest sustainable cost, maintained over the long-term.

ATCO Gas Australia and ATCO Structures and Logistics believe 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 ensure they are aware of, and contractually bound by, our standards of business conduct.

Our success is linked inextricably to the performance of our global supply chain. In 2022, ATCO Gas Australia and ATCO Structure and Logistics collectively partnered with a variety of businesses to a total of ~1,946 vendors. (refer to Table 1 below)

Table 1: Volume of active suppliers per entity



6.1 Risk of Modern Slavery in our Supply Chain

In 2019 and 2020, based on modern slavery risk assessment tools developed by industry groups, ATCO Gas Australia and ATCO Structures & Logistics assessed the modern slavery risks within our supply chain, which took into account industry type and location. The initial risk review identified the following supply chain categories to have a higher modern slavery risk profile:

- in materials and equipment, particularly given global commodity sourcing, manufacture and logistics (including maritime transport) from overseas countries;
- in asset construction and maintenance such as traffic management;
- in IT and professional services, in particular those engaging lower skilled off-shore labour in higher risk regions; and
- in support and ancillary services such as cleaning and security.



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 (incl. clothing), 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)

MANAGEMENT OF MODERN SLAVERY RISKS TO DATE

In the previous year’s statement, ATCO Gas Australia and ATCO Structures and Logistics committed to assess the effectiveness of its modern slavery risk treatment actions as follow:

- Suppliers’ assessment –**
 Continue to monitor the labour and human rights assessment score of our suppliers, in particular, the score distribution across the level “Partial”, “Confirm”, “Advanced” and “Outstanding”. At a minimum, we aim to work with our suppliers to maintain their score distribution within the ESG Supply Chain Assessment Provider’s score distribution benchmark.
- Independent assessment of ATCO’s performance –**
 In 2022, ATCO Australia will engage our ESG Supply Chain Assessment Provider to undertake a detailed assessment of our ESG management practices. A reassessment will be undertaken in 2024/25 to evaluate the effectiveness of its actions and initiatives to manage modern slavery risks.
- Training and awareness –**
 Training and awareness is an important part of our action plan. ATCO Gas Australia and ATCO Structures & Logistics aims to have 100% of our employees involved in procurement decision completing the online modern slavery training in 2022.

7.1 How effective were we?

In 2022, ATCO Gas Australia and ATCO Structures & Logistics met our objectives as detailed above, and made good progress on our commitment to mitigate the risk of modern slavery within our Supply Chains.

We adopted a new online supply chain screening solution to risk assess all of our active suppliers and identify those that should be prioritised for further engagement by ATCO. This risk assessment factored in the supplier’s inherent corporate social responsibility risks (including labour and human rights), and the risk assessment considers the supplier’s industry risk, country risk and procurement risk (based on the level procurement spend level and criticality to our operations). Suppliers with the highest combined inherent risk rating in these categories have been requested to undertake a detailed desktop ESG assessment specifically tailored to their company based on the following parameters:

Cognisant of our role within the industries and communities in which we operate and serve, we undertook a detailed external assessment of our own practices and procedures. The results were insightful and we have prioritised key action items for improvement in 2023 within our own framework.

7.1.1 Suppliers’ Assessments

In addition to maintaining the scores of suppliers which were previously assessed by our ESG Supply Chain Assessment Provider, a further five (5) suppliers with the highest inherent risk ratings were invited to undertake a detailed ESG assessment. This brings the total number of suppliers that have completed an in-depth assessment to 46.

All invited suppliers completed their assessments in 2022. Overall, they scored above average in respect to their ESG maturity in comparison to the ESG Supply Chain Assessment Provider’s benchmark as summarised;

The benchmark is defined as all other suppliers rated by the ESG Supply Chain Assessment Provider who has an established global network of more than 100,000+ rated companies.

Particular focus areas for ATCO Gas Australia and ATCO Structures & Logistics when evaluating the assessment reports were the Labour & Human Rights and Sustainable Procurement aspects. We undertook a detailed review of feedback provided in response to these sections. The findings have highlighted one (1) Supplier that we will work with in 2023 to improve its processes and procedures to mitigate the risk of Modern Slavery.

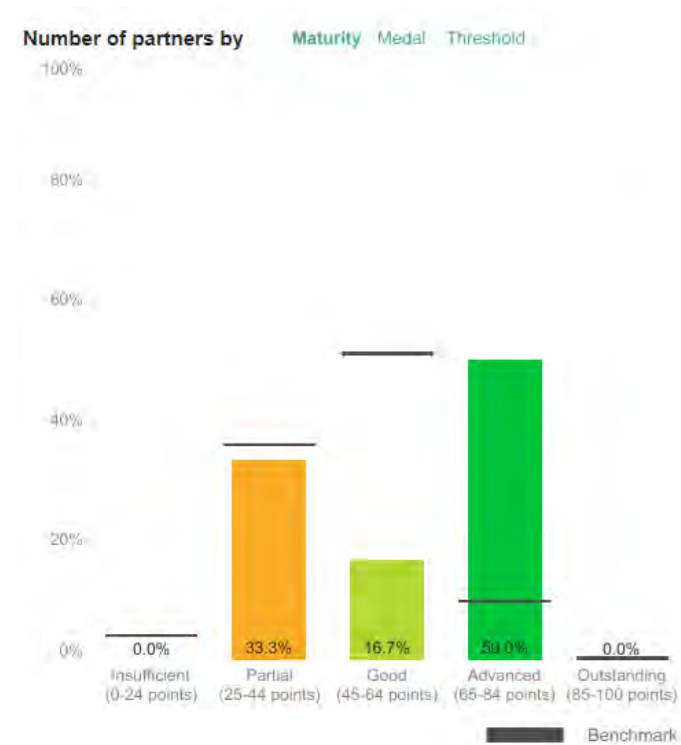


7.1.1.1 Labour and Human Rights

It is important for ATCO Gas Australia and ATCO Structures & Logistics to understand how our chosen business partners compare to the industries in which they operate. In table 1 demonstrates that the majority of our assessed suppliers are performing well above their respective industry benchmarks in relation to their Labour and Human Rights practices. This provides us with confidence that our chosen business partners have sufficient process and procedures in place to treat their direct workforce fairly and in accordance to legislation.

We also recognise that there is room for improvement, such as improving the standard of documentation on labour & human rights policies and will continue working with our suppliers in 2023 and beyond to educate and raise awareness in regards to the importance of robust systems and frameworks that support the fair treatment of employees and mitigate the risk of modern slavery.

Table 1. 2022 Supplier's labour & human rights score against industry benchmarks



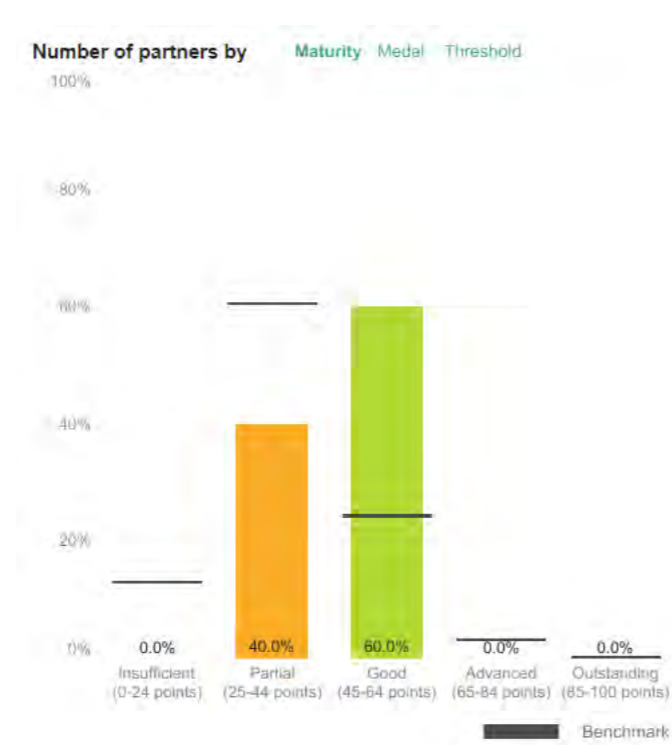
7.1.1.2 Sustainable Procurement

Sustainable procurement is the integration of ESG principles into a company's procurement processes and decisions while ensuring they still meet business objectives.

Sustainable procurement practices have entered into the spotlight for government and private industries alike over the last 5 years and is increasing becoming an integral factor in managing one's Supply Chain. The impact of Covid-19 on global markets has taught us that the integrity of our Supply Chain beyond tier 1 suppliers is of greater importance than ever and represents the biggest opportunity for both us and our suppliers to improve upon.

Whilst our suppliers have scored higher than average in respect to the industries in which they operate, ATCO Gas Australia and ATCO Structures & Logistics are cognisant that we have a responsibility to ensure that all entities within a Supply Chain are treated ethically. We believe that by asking our suppliers to improve their sustainable procurement practices, this will assist to mitigate the risk of modern slavery across ATCO Gas Australia and ATCO Structure & Logistics entire supply chain.

Table 2. 2022 Supplier's sustainable procurement score against industry benchmarks



7.1.2 Independent Assessment of ATCO's Performance

ATCO Australia undertook a detailed assessment of our ESG management practices. In summary, ATCO Australia scored in the 85th percentile of all companies rated by the ESG Supply Chain Assessment Provider. As previously mentioned, the solution provider has assessed over 100,000 companies globally to date so we believe this demonstrates that ATCO Australia has strong systems in place for ESG management.

ATCO Australia scored 16% higher than other companies in our labour and human rights management practises.

Theme score comparison



Key Strengths of ATCO Australia's ESG Management per the external assessment includes;

Our Governance Structures

- The company demonstrates an advanced management system on labour & human rights issues.
- The company demonstrates an advanced management system on ethics issues.
- Grievance mechanism on discrimination and/or harassment issues.
- Awareness training regarding diversity, discrimination, and/or harassment.
- Actions to promote the inclusion of minority/vulnerable groups in the workplace.
- ISO 45001 certified.
- Employee health & safety detailed risk assessment.

Our Industrial Relations Practices

- Employee representatives or employee representative body (e.g. works council).
- Collective agreement on working conditions.
- Communication to all employees of remuneration process (e.g. salary grid, procedure for salary advancement).
- Annual employee satisfaction survey.
- Flexible organization of work (eg. remote work, flexi-time).
- Family Friendly programs (FFPs) implemented (e.g. parental or care leaves, childcare services or allowances).

A key area for improvement for ATCO Australia, much like our suppliers, in 2023 will be in relation to our Sustainable Procurement systems and practices. Out of the recommended improvement areas, ATCO Australia has selected two key items to focus on in 2023;

• Documentation on sustainable procurement policies

ATCO Australia will update its procurement policy and procedures to integrate commitments and operational objectives on all material sourcing risks the company faces.

• Inclusion of social or environmental clauses being included in supplier contracts.

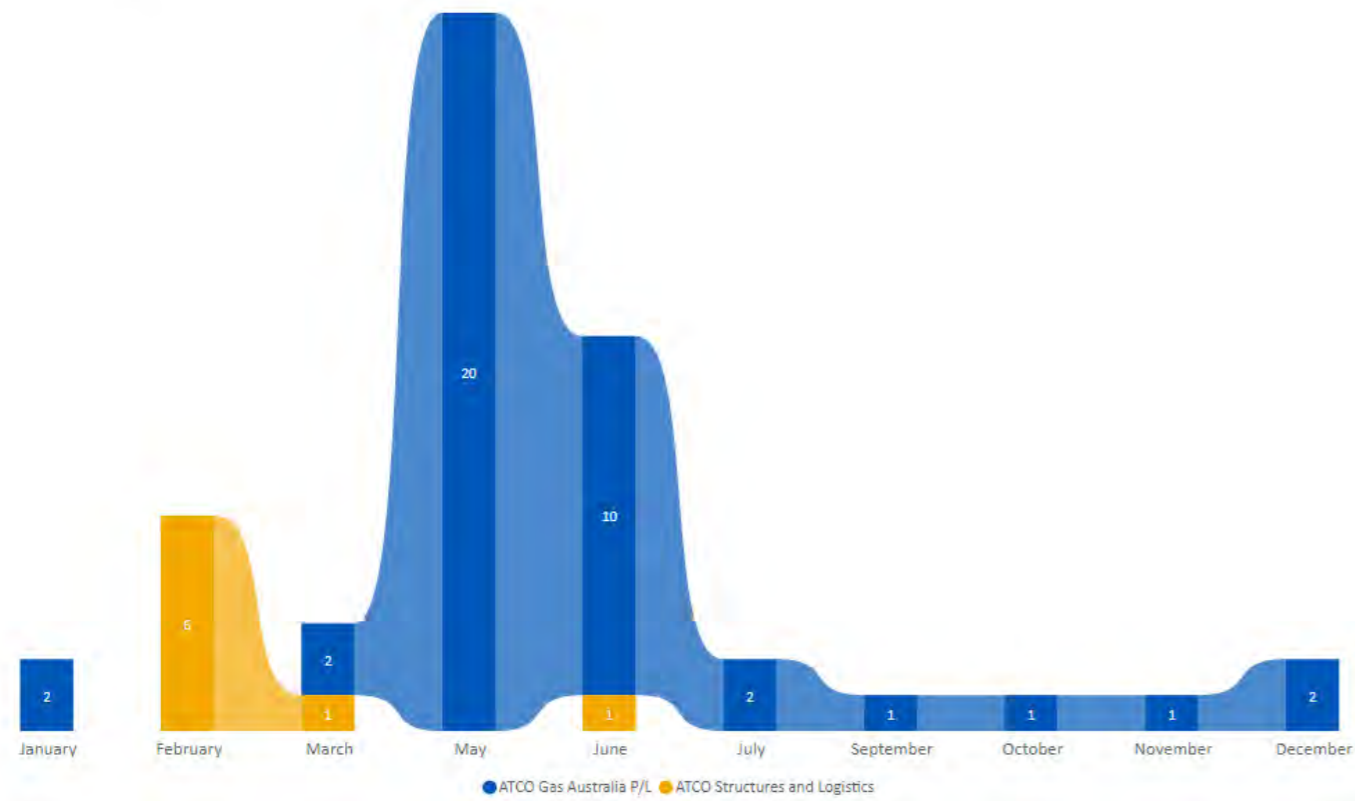
ATCO Australia will incorporate provisions in business contracts that cover social & environmental issues which are not directly connected to the subject matter of the specific contract. It's a tool defining the behaviour/setting the expectations and for engaging with suppliers on sustainability.

7.1.3 Training and awareness

ATCO Gas Australia and ATCO Structures and Logistics rolled out its training module on modern slavery to 73 employees that are involved in procurement decisions in 2022 including all members of its executive team for ATCO Gas Australia and ATCO Structures and Logistics, and the Procurement business unit with a 98% successful completion rate.

We made changes to our on-boarding process to capture all new employees that would be involved in procurement decisions so that we could ensure that they also received this important training module.

ATCO Modern Slavery Training Completed in 2022 by Division



2023 - OUR APPROACH AND PLAN MOVING FORWARD

8.1 Supply Chain Risks

ATCO Gas Australia and ATCO Structure & Logistics will continue with the controls established in 2022, which involves;

- Mapping our 2022 active Supplier's through the risk screening solution to identify potential higher risk suppliers for further evaluation. These suppliers will be required to undertake a detailed assessment and progress with improvement initiatives.
- Continue to work with our Suppliers that were assessed in 2022 on identified areas of improvement.

In 2022, ATCO's in-depth supplier assessments have focused on the construction category. In 2023, ATCO will shift its focus to the Materials and Equipment category for further analysis. This review will align to the screen solution risk factor parameters to determine whether suppliers shall be invited for a detailed ESG assessment. ATCO will also collaborate with our key Suppliers in this category to understand in more detail about their supply chain practices and what risks they have identified in their own Supply chains specific the Materials and Equipment category.

8.2 Training

We will continue to distribute training on modern slavery to all employees involved in procurement decisions and will expand our focus to include;

- All new employees commencing in 2022 in a Manager or above position.

In addition to the further distribution of the Modern Slavery training module to new staff, ATCO will continue to require current employees to complete periodic refresher training on this important issue, once every two years.

As strong advocates for raising awareness on the risk of modern slavery in Australia, ATCO Gas Australia and ATCO Structures & Logistics will develop and distribute;

- Awareness communication messages for wider workforce.
 - These communication messages will help explain what is meant by Modern Slavery, who is most at risk in our communities and what we are doing to mitigate the risk of modern slavery in our Supply Chain.

8.3 ATCO's continuous improvement

In our journey to date, ATCO Gas Australia and ATCO Structures and Logistics has focused on our existing supply chain. In 2023, we will review and streamline our pre-contract practices to ensure that that our future business partners are evaluated in accordance to our principles for the mitigation of modern slavery in our existing supply chain. This ensures that all of ATCO Gas Australia and ATCO Structures & Logistics' suppliers are treated equitably and fairly.

This will involve;

- the incorporation of a modern slavery compliance clause in our tender terms and conditions;
- the evaluation of a supplier's modern slavery practices where the sourcing activity is estimated at \$250,000.00 and above and is managed by our Procurement teams; and
- As recommended in ATCO Australia's own ESG assessment, we will also review and update our Modern Slavery compliance contract clause to ensure it is robustness in high value and risk supply contracts. A further review will confirm that the Modern Slavery compliance clause is included in contract templates.

As our understanding of the risk of modern slavery continues to evolve, and technology is developed to support the evaluation of modern slavery in supply chains, we have a responsibility as good corporate citizens to ensure that we are utilising the right tools and resources to effectively analyse our supply chain. In 2023, we will go to market to validate that our current system is the most effective tool for ATCO Gas Australia and ATCO Structures & Logistics to use.



APPENDIX A – REPORTING ENTITIES

Below is a list of the ATCO entities in Australia covered by this statement as at 31 December 2022 -

- ATCO Gas Australia Networks Pty Ltd (ABN 24 659 123 636)
- ATCO Gas Australia GP Pty Ltd (ABN 76 151 245 779)
- ATCO Gas Australia Pty Ltd (ABN 90 089 531 975)

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 Networks Pty Ltd.

- ATCO Structures & Logistics Pty Ltd (ABN 71 083 902 309)





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