

Document Title	Document Number
Modern Slavery and Human Trafficking Policy	POLHR001A

I. Scope

This Policy statement, pursuant to relevant sections of the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Australia), sets out the actions taken by Atrada Pty Ltd to address modern slavery risks in our business and supply chain as part of our strategic business plan.

II. Purpose

- Modern Slavery Act 2018 (Australia) – Focused on transparency and accountability in business supply chains.
- Modern Slavery Act 2015 (UK) – Consolidated existing offences of slavery, servitude, forced labour, and human trafficking into one statute.

III. Definition

- The UK Act 2015 is both a criminal law and corporate accountability law, tackling offenders directly while requiring transparency.
- The Australian Act 2018 is a transparency framework, compelling large businesses to disclose risks and actions but leaving criminal enforcement to other laws

IV. Authority and Responsibility

- Atrada (Company) – to comply with the modern Slavery Act 2015 (UK) and Modern Slavery Act 2018 (Australia).

V. Methodology

Atrada is committed to building and fostering a culture in which employees, customers and suppliers are treated with dignity, respect and fairness. Our Code of Conduct and Ethics requires that employees, including directors, agents, contractors and others who represent our business, must respect and support human rights.

At Atrada, when we are making decisions and taking action, risk is a primary consideration. This includes the nature of our relationship with suppliers, their geographic location, the types of goods or services being provided, and existing local human rights protections offered to workers.

We recognise that modern slavery does not occur as a stand-alone issue and, as a result, the Supply Chain process aims to holistically consider risk associated with:

1. bribery and corruption;
2. modern slavery;
3. illegal logging;
4. environmental considerations
5. workplace health and safety; and
6. cyber security

We work with our suppliers to assess whether they are meeting our standards. Many of our suppliers have processes in place for managing their own risks and are open to working with us to meet our minimum standards. Where we identify concerns about supplier performance, we engage with the supplier, seeking constructive dialogue and remediation of non-compliance with our standards in relation to labour practices, environmental, health and safety, and bribery and corruption risks as part of sustainability risks.

Due to the nature of the business, we have not identified any high-risk Modern Slavery concerns in 2021.

Future commitments

During 2022, in meeting our due diligence requirements we will focus our attention on the re-evaluation of our supply chain as part of our ISO 9001 Quality System audit program.

Endorsement

This Modern Slavery and Human Trafficking Statement is endorsed by executive management and communicated within Atrada.

VI. Appendix

NONE