



## National Pump & Energy Pty Ltd 2024 MODERN SLAVERY STATEMENT

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### Introduction

This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) ("the Act") on behalf of National Pump & Energy Pty Ltd A.C.N. 098 812 492 ("NPE"), which is classified as a reporting entity in accordance with the provisions of the Act.

Modern Slavery is the term used to describe situations where coercion, threats or deception are used to exploit, undermine or deprive the freedoms of a victim, and includes trafficking, forced labour, deceptive recruiting for labour or services and child labour.

This Statement relates to the reporting period 1 July 2023 to 30 June 2024 and sets out actions taken by NPE to identify, address and prevent modern slavery risks in our business operations and supply chain.

### Structure & Operations

#### Structure

NPE was incorporated in Australia and its legal structure is a proprietary limited company.

NPE is a part of Atlas Copco Group, which is a global group of companies that collectively employed approximately 53,000 staff in around 70+ companies at year end of 2023.

The ultimate parent company of all entities in Atlas Copco Group, including NPE and its subsidiaries, is Atlas Copco AB which is headquartered in Sweden and listed on Nasdaq OMX Stockholm.

The mission of Atlas Copco Group is to deliver sustainable, profitable growth which is achieved by the protection and growth of its businesses, including its people and resources, in a manner that is economically, environmentally and socially responsible.

#### Operations

NPE has a large physical presence operating from eleven sites in Australia and one site in New Zealand.

NPE's principal place of business is located in Welshpool, Perth, Western Australia.

NPE employs approximately 467 employees within its business, with these employees working in various disciplines and located in our sites around Australia and New Zealand.

NPE's core business is the supply, installation and hire of pumps, power generation and ancillary equipment. NPE also provides dewatering and water treatment services to construction and mining entities, councils, government and water authorities.





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NPE's key business values are “**STRIVE**”:

**Safety:** Ensuring the health and safety of all employees.

**Teamwork:** Working together to achieve results.

**Respect:** Our customers, our community and each other.

**Integrity:** To the company and each other.

**Value our customers:** In everything we do.

**Excellence:** Be the best at what we do.

### Supply Chain

The key priorities NPE focus on in our supply chain are quality, safety and value.

NPE's supply chain includes major suppliers and original equipment manufacturers who we engage with on a regular basis, as well as minor suppliers who provide goods and services to us.

The majority of NPE's suppliers are located in Australia, Europe, the United States of America and China.

The following is a non-exhaustive list of the types of goods and services NPE is supplied with:

- Plant, machinery and equipment, including related parts, accessories and consumables.
- Water treatment chemicals and products.
- Oil and fuel.
- Travel and accommodation.
- Personal protective equipment.
- Uniforms.
- Stationary.
- Merchandise.
- Advertising services.
- Office furniture and supplies.
- IT products and services.
- Cleaning products and services.
- Transport, logistic and freight services.

NPE aim to work with reliable and transparent suppliers who uphold the same values that we do by completing a pre-selection due diligence process, followed by negotiation and acceptance of key contract terms and conditions, and then focusing on the retention of long-term arrangements to maintain continuity and sustainability.





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Atlas Copco Group tools to prevent, identify, mitigate and remediate any adverse human rights impacts linked to the Group's operations:

The social conditions vary in the many countries where we and our suppliers operate and human rights related risks, including risks of modern slavery, are present throughout our value chain, mainly relating to our own employees and our suppliers. Being aware of these risks is crucial for successful preventive measures to safeguard us from contributing to adverse impacts. Accordingly, human rights insights constitute a central part of our Enterprise Risk Management process, and our divisions are actively required to consider human rights risks.

Atlas Copco Group wants to do the right thing, in the right way. We are committed to respecting and supporting all internationally recognised human rights principles and to conduct business which does not cause or contribute to adverse human rights impacts. We expect the same ethical behaviour from our business partners. Our Code of Conduct is our central guiding policy, complemented by our Human Rights Statement and additional policies, guidelines and processes outlined in our internal handbook, The Way We Do Things. We apply human rights due diligence procedures to prevent, identify and mitigate adverse human rights impacts linked to our operations, even if we have not directly contributed to those impacts.

Atlas Copco Group's Code of Conduct sets out fundamental ethical values and principles, including respecting and upholding human rights and zero tolerance towards corruption and bribery. The Code apply to all our employees, all our business partners and our Board of Directors in all countries where we are present. It shall always be adhered to, even when it results in setting higher standards than local regulations.

Our Code of Conduct is based on the following international standards:

- United Nations Global Compact.
- United Nations International Bill of Human Rights.
- United Nations Guiding Principles on Business and Human Rights.
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work.
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

The Board of Directors is the owner of the Group's Code of Conduct and reviews it regularly. Group Compliance Board which includes two members of Group Management, VP Sustainability and Head of Group Legal Compliance oversees the implementation and compliance with the Code.

Atlas Copco Group's Human Rights Statement expands further on the Group's commitment to respecting and supporting human rights which, as mentioned, is an integral part of our Code of Conduct. The statement reflects the corporate responsibility as defined in the UN Guiding Principles on Business and Human Rights which we have adopted.

The implementation of the Code of Conduct is a key part of Atlas Copco Group targets to ensure we live by the values we set, and we put significant weight on communication, training and monitoring.





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All employees are required to complete a leader-lead training ethics training every two years (the Code of Conduct classroom training). In addition, all employees are required to annually take a Code of Conduct e-learning and sign their compliance to the Code of Conduct (the Code of Conduct compliance statement). In addition, the Group have developed a specific human rights training which is available to all employees through the Group's intranet.

Internal control is exercised through distribution of responsibilities and internal audits. To be made aware of any suspected breaches of laws or the Code of Conduct, employees are encouraged to report misconduct concerns to HR, their manager, their managers manager or by using our third-party operated system for misconduct reporting, SpeakUp. SpeakUp is publicly available to everybody 24/7 and reports can be made in over 70 languages. SpeakUp enables detection, investigation and potentially remediation of adverse human rights impacts linked to our operations. To ensure awareness of SpeakUp, it is referenced in the Code of Conduct, the classroom training and the compliance statement.

Working with business partners who share Atlas Copco Group's high ethical standards is central to ensure we can manage risks and enhance sustainability throughout our value chain. This includes addressing human rights issues in the supply chain, including modern slavery. We therefore work continuously to assess and reduce the risks associated with our value chain.

All our business partners (suppliers, subcontractors, joint venture partners, agents, resellers and distributors) are expected to follow our Code of Conduct. In addition, significant business partners are required to sign Atlas Copco Group's Business Partner Criteria to confirm compliance with the Group's Code of Conduct. The Business Partner Criteria reflects on the key principles of our Code of Conduct. On signing our Business Partner Criteria, our business partners are committing to the values and principles set out in the Code of Conduct and regular audits to verify compliance. In addition, our business partners are encouraged to take our Code of Conduct training, which is publicly available online, and to report misconduct concerns to us, by using SpeakUp. SpeakUp is referenced in the Business Partner Criteria.

Further, we evaluate our significant suppliers during and after selection on parameters based on the mentioned international standards.

The supplier evaluation process covers:

- Business partner review: Records of governance, ethics and stance against corruption.
- Labor issues: Rejection of forced, compulsory or child labour, elimination of discrimination, safeguarding employee health and safety, and collective bargaining rights.
- Environmental performance: Waste management, chemicals management, minimising emissions, and an efficient use of natural resources.
- Human rights issues: Responsible sourcing and respect for human rights in operations.





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At times, self-assessment checklists are sent to suppliers and on-site evaluations are conducted regularly or when deemed necessary. These result in a report which may include concrete suggestions on improvements in the form of an action plan to be followed up at an agreed time. Atlas Copco Group can provide experience and know-how to suppliers who need support in order to comply with the minimum standards set forth in the Business Partner Criteria document. Suppliers who fail to meet the criteria and who do not show a willingness to improve are rejected.

Atlas Copco Group also has a comprehensive program to ensure responsible sourcing of minerals and investigate the possible use of conflict minerals in the components used in our products. The program covers tin, tantalum, tungsten, gold and cobalt. Data collection and due diligence using the Responsible Minerals Initiative (RMI) guidelines and Cobalt Reporting Template (CRT) is rolled out continuously. Atlas Copco Group is a member of the RMI and adheres to its guidelines by encouraging suppliers to source from smelters verified by a third party such as RMI's Responsible Minerals Assurance Process (RMAP). We also commit to transparency by submitting reporting templates to customers about smelters in the supply chain and collaborate with stakeholders.

When relevant, the Atlas Copco Group partners with our customers to address risks in the value chain. The Group's customer assessment tool is used to identify and evaluate potential environmental, labour, human rights and corruption risks. The assessment is complemented by in-depth dialogue and field visits.

### **Risk Assessment**

NPE acknowledges the possibility that modern slavery could occur within our operations or supply chain and is committed to taking all reasonable action and steps to identify, address and prevent modern slavery in our operations and supply chain.

The following risks need to be considered by NPE in our business:

- Working conditions.
- Forced labour.
- Bribery.
- Corruption.

The following areas remain key risk factors for NPE in our business:

- Selection of customers.
- Selection of suppliers.
- Recruitment of employees.
- Engagement of contractors and subcontractors.

NPE continues to classify the risk level for the occurrence of modern slavery within our business operations and supply chain to be low to moderate, having regard to the nature of operations, location and engagement of customers and suppliers, and the methods used for the recruitment of employees and contractors. We believe we can keep this classification low by thorough mapping which would increase visibility and allow us to conduct regular reviews and audits within our operations and supply chain.





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**Addressing Risks**

As the identification and prevention of modern slavery is central to an ethical and sustainable business, NPE endeavour to proactively approach the assessment and address of risks.

NPE has been assessed and certified as compliant to ISO 9001:2015 (Quality Management Systems), ISO 45001:2018 (Occupational Health and Safety Management Systems) and ISO 14001:2015 (Environmental Management Systems). This demonstrates NPE's commitment to best practice and ensuring the quality, safety, sustainability and efficiency of our business operations, including the labour, equipment and services we supply.

Due Diligence Processes:

NPE conduct our recruitment and selection of employees and personnel in a manner that ensures a fair and transparent process is being followed, provides equal opportunities without discrimination, is compliant with legislation and otherwise is consistent with our company policies and procedures.

NPE ensures that all employees and labour hire personnel are eligible to work in Australia and are remunerated in line with legislation and industrial instruments where they are applicable.

Where NPE use labour hire agencies to engage personnel, we ensure that appropriate due diligence is completed including ensuring that the worker has their identification documents and are not required to pay recruitment fees.

NPE ensures that our employees and personnel are made aware of and acknowledge our policies and procedures, initially when they are on boarded and again when updates are made to the policies and procedures. This includes our local Code of Conduct, Equal Employment Opportunity Policy, Anti-Bribery and Corruption Policy, and Whistleblower Policy.

NPE provides safe working conditions for our employees and focus on implementing operational improvements that offer best practice health and safety in compliance with legislation, regulations and standards.

NPE completes a pre-selection due diligence process of our customers and suppliers. This includes financial and reputational checks, as well as a review of policies, procedures and codes of conduct to ensure they are consistent with the policies, procedures and codes of conduct we have implemented for our business.

NPE ensures that the expectations of our customers align with ours and then attempt to seek mutual warranties and commitments that support our compliance with identifying, addressing and preventing modern slavery risks.

Addressing Risks:

NPE ensure that our senior management team and employees are aware of what modern slavery is and how it could apply to our business operations and supply chain. With this practical understanding of the significance of modern slavery risks, a culture of shared responsibility and compliance with our policies is driven internally. This means employees are alert to possible risks, which allows suspected





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instances of modern slavery to be quickly identified, investigated and actioned in a timely manner.

Where we identify risks, discrepancies or the option for improvement in policies, procedures or practices, either within our business or with a customer or supplier, we work collaboratively to produce a solution to move forward.

**Assessing Effectiveness**

NPE expect our customers, suppliers and employees to comply with our policies, procedures and Code of Conduct which are all designed and implemented with the intention of protecting our business against modern slavery risks.

Actions taken in this period:

In addition to the above due diligence processes and general measures to address risks, NPE undertook the following actions in this reporting period:

- Signing commitment to comply with Atlas Copco Group Code of Conduct by all active employees.
- Promotion of our local whistleblower policy and procedure so that employees, customers and suppliers are aware that they can disclose concerns without adverse impact.
- Inclusion of a specific clause in contracts with customers and suppliers that guard against modern slavery risks, where possible.

Future actions:

In accordance with our continuous improvement approach to addressing modern slavery, NPE intend to:

- Provide employees of NPE with training and awareness on the risks of modern slavery in our operations, including the roll out of Atlas Copco Group Code of Conduct Classroom Training.
- Provide employees with details of Atlas Copco Group Speak Up system which is another option for employees to disclose concerns without adverse impact.
- Amend our standard terms and conditions to include reference to Atlas Copco Group Code of Conduct with a corresponding acknowledgement of compliance.
- Have significant business partners to sign compliance with Atlas Copco Group Business Partner Criteria.
- Complete an audit of our supply chain and ensure we are engaging with parties who are also committed to identifying and addressing modern slavery risks in their operations.
- Request parties we are engaging with complete a Modern Slavery Questionnaire so that we can better understand potential risks and create strategies for mitigation.
- Create a working group that meets quarterly to discuss modern slavery risks, implications and strategies for prevention.





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- Develop an Anti-Modern Slavery Policy that includes a clear escalation procedure where there are suspected acts of modern slavery in our operations or supply chain.

NPE acknowledges that setting goals and creating a plan is only the first step in the process to preventing modern slavery. We are a dynamic business that is able to react, adapt and respond to challenges as they are identified and are committed to taking the necessary steps to review and progress our business each year so that we can contribute effectively to the prevention of modern slavery.

During the reporting year, NPE has continued the work implementing Atlas Copco Group processes and actions to identify and address modern slavery risks in its own operations and supply chain. This work will continue also during the coming reporting year.

### Consultation Process

NPE actively engaged and consulted with all companies we own or control in the preparation of this Statement for the current reporting period. The requirements of the Act were discussed, as well as steps to be taken in the future to address modern slavery requirements. All stakeholders will be kept updated with NPE's approach to ensure compliance in the future.

### Final Statement

The Board of Directors approved this Statement on 12 December 2024, and it is available on our website.

Signed by:  
  
61A2D9DC8FE449C...  
Timothy Last  
**Director**

12 December 2024 | 6:12:38 PM AEST

