



ATNIS Modern Slavery

This policy sets out our commitment to creating a workplace where every individual feels valued, empowered, and heard.





Table of Contents

Introduction	Page 03
Structure and Operations	Page 04
Supply Chains	Page 04
Risk Of Modern Slavery	Page 05
Actions Taken to Address Risks	Page 05
Our People	Page 07
Training and Awareness	Page 07
Speaking Up	Page 07
Monitoring and Effectiveness	Page 08
Looking Ahead	Page 08
Governance and Approval	Page 08
Conclusion	Page 09



Introduction

ATNIS is a global technology company with operations in Australia, India, and Singapore. We deliver large-scale next-generation IT services and help organisations manage complex digital environments. IT services and support organisations in managing complex and evolving digital environments.

We are committed to conducting our business in an ethical, transparent, and responsible manner. ATNIS maintains a strict zero-tolerance approach to the following:

ATNIS has a zero-tolerance approach to:

- Modern slavery, in all its forms.
- Forced or compulsory labour.
- Human trafficking.
- Any form of human rights abuse or exploitation.

These principles apply across our operations and extend to our employees, partners, and suppliers.

We believe such practices have no place in modern business or global supply chains. This statement outlines the steps ATNIS takes to identify, assess, and mitigate the risk of modern slavery within our operations and supply chain, and to ensure compliance with relevant legal and ethical standards.





Supplier Standards:

All suppliers are expected to follow ATNIS standards, including:

- Compliance with all laws.
- Respect for human rights.
- No use of forced or child labour.
- Fair working conditions.

Suppliers must act with integrity and avoid unethical practices.

Policies and Governance:

ATNIS supports its commitment through internal policies, including:

- *Code of Ethics.*
- *Anti-Corruption Policy.*
- *Conflict of Interest Policy.*
- *Speak Up / Whistleblower Policy.*
- *Data and Privacy Policies.*

These policies guide employees and partners in maintaining ethical conduct.

Remediation Approach:

If risks or violations are identified, ATNIS will:

- Investigate the issue.
- Engage with the relevant supplier or party.
- Take corrective actions.
- Terminate relationships if necessary.

Our goal is to prevent harm and improve standards across our network.



Monitoring and Effectiveness:

ATNIS regularly reviews its processes to ensure effectiveness.

This includes:

- Internal reviews and audits.
- Supplier assessments.
- Tracking reported concerns.

We use these insights to improve our approach over time.

Looking Ahead:

ATNIS is committed to continuous improvement.

We will:

- Strengthen supplier due diligence.
- Improve risk assessment processes.
- Increase awareness and training.
- Align with global best practices.

We aim to build a responsible and transparent supply chain.

Governance and Approval:

This Modern Slavery Statement is approved by ATNIS leadership.

Senior management is responsible for:

- Ensuring compliance.
- Monitoring risks.
- Supporting ethical practices across the organization.





Our People:

ATNIS is committed to creating a safe, fair, and inclusive workplace.

We ensure:

- Equal opportunities for all employees.
- Fair hiring and recruitment practices.
- A respectful and professional work environment.

We do not tolerate:

- Discrimination.
- Harassment.
- Exploitation of any kind.

Training and Awareness:

We provide training to employees to ensure awareness of:

- Modern slavery risks.
- Ethical business practices.
- Human rights responsibilities.

Training may include:

- Ethics and compliance programs.
- Workplace conduct training.
- Reporting and escalation procedures.

Employees are expected to complete required training regularly.

Speaking Up:

ATNIS encourages employees and partners to report concerns.

Concerns can include:

- Unethical behavior.
- Human rights violations.
- Suspicious supplier activities.

We ensure:




- Confidential reporting channels.
- Protection against retaliation.



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Conclusion:

ATNIS is firmly committed to operating in a responsible, transparent, and ethical manner across all aspects of its business. We recognize the importance of continuously identifying potential risks within our operations and supply chains, and we take proactive steps to address them effectively. By implementing strong policies and regularly reviewing our practices, we strive to create a system that promotes accountability and integrity. Our approach is rooted in ongoing improvement, ensuring that our processes evolve to meet the highest standards. We remain dedicated to taking meaningful action wherever risks are identified and to strengthening our internal frameworks. Through these efforts, we aim to build a culture of responsibility and trust. Ultimately, our goal is to ensure that modern slavery has no place in our business or supply chain, now or in the future.



Risks of Modern Slavery

ATNIS understands that risks may exist in both:

- Our operations
- Our supply chains

Operational Risks:

Our core workforce is made up of skilled professionals, which significantly reduces the risk of modern slavery within our direct operations.

However, we remain aware that risks may still arise in:

- Contract-based roles.
- Third-party staffing arrangements.

Supply Chain Risks:

Higher risks may exist in:

- Suppliers operating in different regions.
- Third-party service providers.
- Vendors with extended supply chains.

Factors that may increase risk include:

- Weak labour protections in certain regions.
- Outsourcing practices.
- Lack of transparency in supplier operations.

ATNIS recognises that modern slavery risks may exist across both our operations and our supply chains.

Actions Taken to Address Risks

ATNIS takes active steps to identify and manage modern slavery risks.

Due Diligence:

We apply due diligence processes when:

- Selecting suppliers.
- Onboarding vendors.
- Entering new business relationships.

This includes:

- Reviewing supplier background and practices.
- Assessing risk levels based on geography and service type.
- Ensuring alignment with ATNIS ethical standards.



Our Structure, Operations, and Supply Chains

Structure and Operations:

ATNIS operates as a technology services company delivering:

- Data migration solutions.
- Digital transformation services.
- Technology consulting.

Our workforce consists of skilled professionals working across multiple regions. We believe that technology alone does not create value people do. Our approach is built on collaboration, innovation, and responsible delivery.

Supply Chains:

ATNIS works with suppliers and partners to support:

- Technology infrastructure.
- Office operations.
- Professional services.

Our supply chain includes:

- IT equipment providers.
- Software and cloud service vendors.
- Operational and facility service providers.

We recognize that supply chains can be complex and may carry risks related to human rights.