



AA HOLDINGS

AA Holdings Pty Ltd

ACN 112 233 744  
ABN 94 112 233 744

115 Sackville Street  
Collingwood Victoria 3066

## 1. AA HOLDINGS PTY LTD MODERN SLAVERY STATEMENT

**Date: 30 December 2022**

This Modern Slavery statement covers the activities of AA Holdings Pty Ltd (ABN 94 112 233 744) for the period of 1 July 2021 to 30<sup>th</sup> June 2022 and is published in compliance with our obligations pursuant to the *Modern Slavery Act 2018 (Cth)*.

This statement outlines the actions taken to assess and address modern slavery risks in internal operations and external supply chains, and forms part of a program of commitment to further engagement and development over time.

Although it is recognized that AA Holdings Pty Ltd is at the end of almost all of its supply chains, and is a price taker as opposed to market influencer in almost all of its relationships, all entities have a role to play in respecting human rights and that the actions each entity takes to assess, address, report and engage these matters, leads to greater awareness and action and thus potentially better outcomes.

### **About AA Holdings**

AA Holdings Pty Ltd (AA Holdings) owns and operates a network of Petrol Stations within the inner and outer suburbs of Melbourne.

AA Holdings designs, constructs and licenses retail outlets, providing branded fuel products, convenience shop items, and carwash facilities which operate 24 hours, 7 days a week. AA Holdings is committed to meeting customer requirements by providing quality, branded products, fast professional service and a well presented chain of retail stores.

AA Holdings is a responsible community member and is mindful of the opinions of its neighbourhoods. We construct and operate facilities which observe applicable environmental standards and regulatory requirements.

AA Holdings Pty Ltd is a part of the downstream petroleum industry which is categorized by high volume sales of fuel at low margins (ACCC 2020).



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More information on the operation of the downstream petroleum industry refer to:

- ACAPMA – Australasian Convenience and Petroleum Marketers Association – <https://acapma.com.au/>
- ACCC Financial performance of the Australian downstream petroleum industry 2002-2018, April 2020 – <https://www.accc.gov.au/system/files/Financial%20performance%20of%20the%20Australian%20downstream%20petroleum%20industry%202002%20to%202018.pdf>

### **Structure**

AA Holdings is an Australian organization and is a family owned business which is led by its management team who oversee the day to day operations of the company. The structure of the reporting entity remains unchanged since our previous Modern Slavery Report. The AA Holdings head office is located at 115 Sackville Street, Collingwood VIC 3066.

Overarching AA Holdings' organisation and governance structure is the company's policies and procedures, culture and values and business processes and risk management.

AA Holdings currently employs 49 employees.

### **Operations**

AA Holdings is part of the downstream petroleum industry. This industry includes:

- Fuel wholesale businesses who source and transport fuels in trucks from terminals and depots to customers; and
- Fuel retail businesses who sell transportation fuels to customers at service stations; and
- Total supply which comprises refining, importing and buy-sell transactions between refiners.

The downstream petroleum industry in Australia is at the end of a long supply chain in terms of its key inputs being fuel, equipment in relation to fuel supplies, storage and pumps and convenience store equipment and shop product offerings.

While to a consumer, particularly at a service station level, the industry appears dominated by large international brands the reality is that most service stations are independent, family operated businesses many of which are small to medium in size.



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### **Supplier Chain**

AA Holdings is at the end of most of the supply chains it participates in and as a proud Australian business, AA Holdings is committed to engaging Australian suppliers wherever possible.

AA Holdings appreciates that it is at the end of a global supply chain which constitutes services (and labour) that are sourced in Australia and overseas. Although AA Holdings does not import any items from outside Australia directly it does note that some of its Australian Suppliers do import items directly from manufacturers overseas.

Procurement is centralized via Head Office for all suppliers and our supply chain arrangements remain largely unchanged to the previous reporting period.

Our supply chain relationship's continue to consist of a broad range of industry segments which includes suppliers from the following sectors:

- Consulting and Contractor Services, Corporate Clothing, Motor Vehicle Management and maintenance, Information Communications and Technology, Logistics and Transport, Marketing, Office Cleaning, Office Supplies and Consumables, Print and Promotional Goods and Services, Property Services, Travel and Recruitment.
- Fuel and associated fuel system equipment, storage and maintenance;
- Convenience store equipment/ fixtures and convenience retail products, Shop Signage;
- Electricity, water, telecommunications, waste and environmental management services;
- Uniforms, Subscriptions, legal and taxation services.

AA Holdings recognises the services that contribute to its own goods and services extend beyond those received from direct suppliers as it also includes goods and services used by indirect suppliers.

### **Risks of Modern Slavery Practices in the operations and supply chains of AA Holdings**

AA Holdings has undertaken to assess the risks of modern slavery in internal operations and they are considered low and remain unchanged from the previous reporting period. AA Holdings maintains its commitment to, and the compliance with, Australian Employment and safety laws which reduces the risk of modern slavery impacts. AA Holdings continues to actively participate in annual independent reviews of employment and safety compliance audits which are undertaken by the industry association ACAPMA.



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The AA Holdings service station network is operated under commission agent arrangement. The commission agent is a separate business receiving fuel commissions for selling fuel on behalf of AA Holdings. These separate businesses engage, pay and manage their own staff. While they are a separate business it is recognized that they pose a risk of modern slavery connected to AA Holdings and as such special arrangements and requirements, including the requirement to provide evidence of annual independent audit of employment and safety compliance, is undertaken.

As part of the first modern slavery statement in the March 2021 reporting period AA Holdings had undertaken to educate itself and its decision makers about modern slavery, and to consider the development of a plan for assessing risk now and into the future.

During the second and continuing through to the current reporting period AA Holdings has:

- Continued to build on its learnings.
- Ensure modern slavery considerations have been maintained/reviewed upon renewal of major supply contracts if relevant including identification of any potential risk areas with new suppliers where AA Holdings could be exposed to human rights concerns.
- Completed the annual external employment and safety compliance audit of its network of commission agents which are undertaken by the industry association ACAPMA.

#### ***Supply Chain:***

The AA Holdings network of Petrol Stations are BP branded and the relationship between the two companies started over 50 years ago.

BP supplies AA Holdings with its automotive fuels for sale to end users which BP sources from a range of domestic and international suppliers.

As part of AA Holdings ongoing commitment to increase the effectiveness of its modern slavery approach AA Holdings focus during the current reporting period has been on familiarizing itself with BP's Modern Slavery Statement and the processes and actions it has taken in its ongoing commitment in supporting the elimination of modern slavery.

Also AA Holdings continues to ensure that it is represented at the bp Australia quarterly Dealer meetings as well as the annual independent business partners' conference where identified issues can be raised and discussed.



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AA Holdings acknowledges that any claims or instances of modern slavery will be addressed with confidentiality, and with the assistance from the industry association and government. AA Holdings recognizes that it is not equipped to handle instances regarding Modern Slavery on its own.

AA Holdings has consulted on the content and form of this statement with all associated entities and it was approved by the sole director on 20<sup>th</sup> December 2022 prior to publication.

This Statement was approved on the 20<sup>th</sup> December 2022.

**Andreas Andrianopoulos**  
Sole Director  
AA Holdings Pty Ltd