



20 December 2024

COMMONWEALTH MODERN SLAVERY ANNUAL STATEMENT – FY2024

Reporting entity

WA Fuel Supplies Pty Ltd, ABN 73 604 421 267 (WAFS) is making this annual Modern Slavery Statement in accordance with the *Modern Slavery Act 2018 (Cth)* for the period 1 July 2023 to 30 June 2024.

Based on the guidance provided by the Act, modern slavery is used to describe *situations where coercion, threats or deception are used to (seriously) exploit victims and undermine or deprive them of their freedom*. This statement outlines steps which WAFS has taken during the reporting period to identify and address modern slavery within our supply chain.

Reporting entity structure

Established in 2015, WAFS is a privately owned Western Australian company that is engaged with the provision of fuel storage and supply services throughout Western Australia and Victoria. Our operations consist of

- Supply of fuel sourced ex one of the “major” fuel companies to customers;
- Delivery of bulk fuel to sites using our fleet of prime movers and tankers;
- Provision of site refuelling services to customers utilising our fleet of refuelling trucks; and
- Provision of fuel storage solutions for customers via the supply, delivery and commissioning of self-bunded fuel tanks ranging in size from 1,000-litre to 120,000-litre.

WAFS operates with a flat organisational structure wherein the two company directors are actively involved with the day-to-day operations of the business. This ensures that decisions can be made without the requirement to refer such decisions to “off-site” boards and/or parent entities.

As articulated in our (endorsed) Modern Slavery Policy, WAFS is committed to ensuring that modern slavery is not taking place anywhere within our own business and our supply chain, whilst expecting our suppliers, contractors and other business partners to share our commitment. In addition, WAFS is committed to

- acting ethically and with integrity in all our business dealings and relationships;
- engaging suppliers, contractors and other business partners who are socially responsible; and
- implementing and enforcing effective systems and controls to assess our supply chain.

Given that WA Fuels as the reporting entity does not either own nor control any other operational entities, there was no need for consultation with other entities during compilation of this annual Modern Slavery Statement.

Risk of Modern Slavery

WAFS have completed a risk assessment of our internal and external operations, with the following outcomes:

a. Internal

All employees of WAFS are based in Australia and are remunerated at above award rates. Working conditions are monitored to ensure compliance with workplace health & safety guidelines.



Upon commencement of employment, all members of our Team undergo an extensive induction process which is overseen by both their direct manager and our People & Culture Coordinator. As part of this induction, all WAFS policies and procedures – including Anti-Discrimination, Anti-Bribery and Corruption and Modern Slavery policies – are explained.

Consequently, WAFS have deemed the possibility of an occurrence of modern slavery within our internal operations as **low** risk.

b. External

Within our supply chain, our major suppliers are

- The “major” fuel companies from who we source fuel & oils. Given that these entities are subject to high levels of regulation and are similarly required to demonstrate compliance with the Modern Slavery Act 2018 (Cth), WAFS consider that the risk of modern slavery is **low**;
- The suppliers of the self-bunded fuel tanks that WAFS supply, deliver and commission for our customers. As these suppliers are often based in geographic locations outside Australia where there is a higher risk of modern slavery, it is in this area that WAFS will be focussing efforts associated with modern slavery compliance. Notwithstanding, the high compliance, component quality tracing and regulatory nature of fuel storage means that the risk of modern slavery is currently assessed by WAFS as being **low**.

Mitigating actions taken

This modern slavery reporting period is the first for WAFS. Whilst the foundations have been laid to ensure WAFS compliance with modern slavery guidelines, our focus, as it is across all aspects of our business, is on continual improvement. As a consequence, a priority in subsequent reporting periods will be on closing the gap, especially in the area of supply of self-bunded fuel tanks.

Moving forward, WAFS is committed to:

- Working with our suppliers, subcontractors and business partners to provide education associated with the modern slavery requirements;
- Following education, further assessment of suppliers, subcontractors and business partners to ensure compliance with modern slavery requirements; and
- Ongoing consideration of relevant social, economic and political factors that may contribute to modern slavery.

Notwithstanding our stated focus for future periods, if in the course of ongoing operations WAFS becomes aware of a breach of our Modern Slavery Policy, we shall:

- Take all reasonable action to address, remove or cease associated practices, including if applicable by working with other entities in our supply chain; and
- Take all reasonable steps to remediate any adverse impacts caused or contributed to by suppliers, subcontractors and business partners.

Effectiveness mitigating actions

WAFS is still in the early stages of modern slavery management. Notwithstanding, we take the risk of modern slavery within our supply chain as a serious matter and are committed to implementing necessary steps to minimise associated risks.



First and foremost, communications - both within and external to the business - will continue to be the #1 tool used. WAFS will regularly review and update our policies and procedures, including our Modern Slavery policy, to ensure new risks and challenges are addressed and industry best practices adopted.

Consultation process

WAFS will collaborate with industry peers, organisations and government entities to share knowledge, best practices and challenges in addressing modern slavery.

Other

WAFS is committed to upholding human rights, ensuring fair treatment for all and taking a proactive stance against modern slavery. As articulated within our modern slavery statement, by working together and fostering a culture of responsibility and respect, WAFS aims to create a better future for all.

This Modern Slavery Statement was approved by the directors of WAFS.

Yours sincerely
for WA FUEL SUPPLIES Pty Ltd

A handwritten signature in blue ink, appearing to read "M. Blayney", with a long horizontal stroke extending to the right.

MARK BLAYNEY
Managing Director