



DIB GROUP PTY LTD

ABN 87 002 889 474

Date: 16th Nov, 2021

Modern Slavery Statement

Introduction

This Modern Slavery Statement covers the activities of DIB Group Pty Ltd T/A Metro Petroleum ABN: 87 002 889 474 (The DIB Group), and for the purposes of Modern Slavery Reporting includes all subsidiaries; (their names and ABN are listed in table below) for the period of 1st July 2019 to 30th June 2020.

Company	ABN
4 Brothers (NSW)	29 082 671 752
Australasian Investment	52 111 695 311
Buddy's In Properties	50 096 135 661
DG Credit Services	78 643 092 326
DG International Investments Corporation	32 081 134 358
DG Properties	32 081 134 358
Dib Family unit Trust	26 568 614 661
DibZib	85 069 722 587
Dragon Investments	52 076 404 496
Forget The Rest	91 093 390 302
GE &SA Enterprises	35 084 422 551
Karam International	39 148 944 825
Let's Expand	27 082 539 713
Makhlouf Enterprises	98 080 095 478
Milperra Petroleum	85 084 795 451
Norman Dib	50 002 599 706
R U Ready	36 091 132 142
RXT	18 084 966 012
Together Again	50 092 015 542
Triple 8 Investment	69 035 729 445
Tuggerah Petroleum	70 084 328 807
Wentworthville	91 077 324 826

This inaugural statement, compiled under the *Modern Slavery Act 2018 (Cth)* 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.



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It is recognised that while The DIB Group 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 on these matters, leads to greater awareness and action and thus potentially better outcomes.

About

Industry

The DIB Group operates in the downstream petroleum industry. This industry includes;

- Fuel wholesale businesses, DIB Group sources fuel products from its fuel suppliers and transport the products from terminals and depots to commercial customers and service stations, and
- Fuel retail businesses, DIB Group has a network of retail sites (service stations) to on sale fuel products customers. There are approximately 7,300 retail fuel sites, or service stations, in Australia.

The downstream petroleum industry in Australia is the end of a long supply chain in terms of its key inputs; fuel, fuel truck equipment, fuel storage equipment, fuel pumping equipment, convenience store equipment and product offering.

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 and fuel transport and depot businesses are independent, family operated businesses, many of which are small to medium in size.

The downstream petroleum industry is categorised by high volumes of sales of fuel, at low margins (ACCC 2020).

For more information on the operation of the downstream petroleum industry see;

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



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Entity

The DIB Group is Australian owned and operated family business and is a proprietary limited company. Head office is at Suite D, 255 Rawson Road, Auburn NSW 2144.

Operating service station retail sites and fuel transport for over 40 years DIB Group is proud to be part of the community

Dib Group has a network of 236 branded retail fuel sites or service stations across the country with 132 of those operated as commission agents and the remainder as resellers, as well as 3 wholesale depots and 15 fuel trucks.

Employing a total of 80 staff; 60 in head office and 3 depots; as well as 20 staff in trucking.

Supply Chain

The DIB Group is at the end of most of the supply chains. It participates in and has a policy and operational approach to engage with Australian based entities in the first instance wherever practical to support Australian owned and Australian made.

The operations have variable suppliers based on availability and is supplied from a broad range of industry subsegments, including the following;

<u>Primary</u>	Fuel Fuel System Equipment Fuel Transport Vehicles Convenience store stock Convenience store Equipment Electricity Water Telecom Commission Agent Stores Contractor/subcontractor Drivers
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<u>Secondary</u>	Fuel Systems maintenance services Fuel Transport Vehicle maintenance service Uniforms Software Promotional coordination service Promotional materials Office consumables
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<u>Tertiary</u>	Subscriptions Legal services Taxation services Business and financial services Waste management services
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The DIB Group does not import any items from outside of Australia, though it does note that some of its Australian suppliers may do so.

The DIB Group does not employ or engage any staff or workers outside of Australia.

Risks of modern slavery practices in operations and supply chains

Internal operations

The DIB Group has undertaken to assess the risks of modern slavery in internal operations and they are considered to be low. In addition to the commitment to and compliance with Australian employment and safety laws, which reduces the risk of modern slavery impacts, The DIB Group also actively participates in annual independent review of employment and safety compliance audits undertaken by the industry association ACAPMA.

Commission agent arrangements

The DIB Group partners with other businesses who operate sites owned/branded as part of the entity network in a Commission Agent arrangement. Not technically a franchise arrangement, it is nonetheless similar in that there is a connection of branding, however the retail fuel site that is a commission agent does not own the fuel, their business simply receive a commission for selling the fuel on behalf of The DIB Group. These separate businesses engage, pay and manage their own staff. While separate businesses it is recognised that they pose a risk of modern slavery connected to The DIB Group and as such special engagements and requirements, including requirement to provide evidence of annual independent audit of employment and safety compliance, has been undertaken.

Supply chains

The DIB Group is an Australian entity that sources its products and services from exclusively Australian entities and suppliers, reducing the risk of modern slavery practices being present.



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Australia's Global Slavery Index is at 0.6 victims of modern slavery for every thousand people, one of the lowest in the world, with the highest risks in sexual exploitation, forced marriage and forced labour. The overall risk level for Australia is Low according to the Global Slavery Index (Global Slavery Index <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>)

Assessing and Addressing Risk

The DIB Group has, as part of this first modern slavery statement reporting period, undertaken to educate itself and its decision makers about modern slavery, and to develop a plan for assessing risk now and into the future and building and developing the framework for addressing risks.

During the first reporting period The DIB Group has;

- Educated itself. This included researching the nature of modern slavery, understanding government guidance, engaging with the industry Association on industry context and specific industry risk points.
- Undertaken an initial risk assessment of internal operations and developed a plan for ongoing assessment, reporting, response and review.
- Undertaken an initial risk assessment of supply chains and developed a plan for ongoing assessment, reporting response and review.
- Updated policies to reflect modern slavery considerations.
- Added modern slavery considerations to major supply contracts.

The DIB Group has developed a plan to increase the effectiveness of its modern slavery approach for both internal operations and supply chain, this plan includes;

- Internal operations:
 - expanding internal communications on the risks of modern slavery,
 - expanding training on the risks of modern slavery to other leaders in the operation,



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- communication of modern slavery statement to all staff,
 - communication of internal confidential reporting mechanisms already in place and their availability for reporting modern slavery concerns,
 - continuing with annual external employment and safety compliance auditing of company and commission agent sites,
 - annual internal risk questionnaire and the addition of modern slavery considerations to safety and compliance meetings, and
 - quarterly executive review of risks in operations and review of internal confidential reporting mechanisms.
- **Supply Chain:**
 - expanding the risk assessment to include supplier questionnaires to identify product origin and product origin risk factors,
 - specifying modern slavery considerations in major supply contracts,
 - reviewing the Modern Slavery Statements of major suppliers (once published), and
 - engaging with the industry association to addressing any specifically identified areas of concern in the broader supply chain.

Any claims or instances of modern slavery will be addressed in confidentiality and in concert with advice from the industry association and government. The DIB Group recognises that we are not equipped to handle instances on our own.



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Assessing Effectiveness

The DIB Group is committed to reviewing the approach to modern slavery and all associated processes, policies and communications. The addition of modern slavery to the quarterly executive meetings and all safety meetings, in addition to the specific modern slavery statement preparation process ensures ongoing review of systems and effectiveness.

In addition, over time, reporting on; the number of complaints received and resolved, the proportion of management and leaders trained in modern slavery and the engagement with suppliers on modern slavery will allow for the assessment of the effectiveness of the approach.

Consultation

The DIB Group has consulted on the content and form of this statement with all associated entities and it was approved by each prior to publication.

Other Items

This statement is the first for The DIB Group. It is recognised that this is a starting point for a broader engagement, assessment and communication program and that further steps will be required in the future and The DIB Group is committed to taking the steps required to do its small part in combating modern slavery.

Consultation and Approval

Consultation on this statement was conducted entirely internally and it was approved by the principle governing body for the reporting entity, being the Board of Directors on 15th Nov 2021 and is signed by John Dib as duly appointed responsible member of the governing body of the reporting entity holding the position of Managing Director.

Signature:

John Dib

Managing Director

16th Nov 2021



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