

Modern Slavery Statement Financial Year 2020

Our Commitment

This statement is prepared in accordance with the Modern Slavery Act 2018 (Cth) and sets out the actions taken by Bonney Energy to address modern slavery risks in our operations and supply chains for the financial year ending 30 June 2020.

We are committed to respecting, promoting and upholding the rights and freedoms of all human beings as enshrined in The United Nations Universal Declaration of Human Rights. We acknowledge that with approximately 40 million victims around the world including 16 million in the private economy, as identified by the United Nations (UN) and Walk Free Foundation, there is a potential risk within our supply chains which requires continuous assessment and increased engagement with suppliers.

Organisational Structure

This is a joint statement prepared on behalf of reporting entities Bonney Energy Group Pty Ltd and Bonney Energy Victoria Pty Ltd (jointly referred to as “Bonney Energy”).



Both reporting entities are Australian Proprietary companies with Bonney Energy Group Pty Ltd being founded in 1991 and Bonney Energy Victoria in 2012.

Bonney Energy’s head office and registered office are both located in Tasmania. Corporate functions, including human resource and supply chain management, are provided to both reporting entities by Bonney Energy Corporate Pty Ltd thereby ensuring consistency across all associated entities in the adoption and implementation of company policies, procedures and systems.

This statement has been prepared in consultation with Bonney Energy’s Board of Management and Executive Leadership Team. Board members are common across all three entities.

Operations

Bonney Energy provide a range of dangerous goods transport and supply solutions and operate a network of services stations and 24 hour fuel stops across Victoria and Tasmania. Our workforce primarily consists of employees located at company operated sites across Victoria and Tasmania with the average throughout the year being 118 employees in Victoria and 98 employees in Tasmania. Our employees are engaged under contract, an award or via enterprise agreements and have freedom to associate with any trade union should they choose.

Supply Chain

Our trade and non-trade suppliers are located in Australia and predominantly include supply of the below goods and services.

Trade suppliers:

- fuel and lubricant suppliers; and
- goods for sale throughout our service station network.

Non-trade suppliers:

- equipment for use in our operations (heavy vehicles, fuel tankers, fleet vehicles, IT equipment);
- maintenance services;
- construction services;
- IT services; and
- uniform and personal protective equipment.

Modern Slavery Risk Assessment & Actions

Operational Risks & Actions

Whilst no region is immune to modern slavery practices, certain regions present a lower risk. Bonney Energy operate solely within Australia which is defined as a low risk geographical region (The Global Slavery Index 2018, Walk Free Foundation). We do however recognise that modern slavery may exist in any environment and it is our responsibility to raise awareness and take a systematic approach to the development and continuous monitoring and review of policies and systems to support compliance to legislation. Furthermore, policies adopted by Bonney Energy are designed to promote a culture of respect for human rights and our core values of safety, caring for the environment and business integrity.

Employees are inducted into the following company policies during the first few weeks of employment and provided with the opportunity for feedback and discussion. A program of regular review of policies ensures they remain consistent with legislation and company values.

- *Code of Conduct and Business Ethics Policy*
- *Equal Employment Opportunity Policy*
- *Human Resources Management Policy*
- *Bullying, Discrimination & Harassment Policy*
- *Occupational Health & Safety Policy*
- *Environmental Policy*
- *Whistleblower Policy (adopted 2020)*

Bonney Energy recognise whistleblowers play an important role in identifying and calling out misconduct and should be protected when they come forward with concerns. Bonney Energy's Whistleblower Policy aims to encourage people within Bonney Energy who are aware of wrongdoing to speak up and make a disclosure of the wrongdoing, ensuring individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported.

Under Bonney Energy's corporate governance framework an annual audit of the payroll system is completed to ensure all employees are remunerated in accordance with legislation.

Supply Chain Risks & Actions

Bonney Energy has long-standing relationships with their small network of trade suppliers all of whom are located within Australia. Trade suppliers account for approximately 96% of total purchases. Our non-trade supply network accounts for approximately 4% of total purchases and is also limited to a network of suppliers located in Australia.

Risk based on geographic location and long-standing relationships with our major suppliers is therefore perceived to be low. However, further engagement with key suppliers is required to understand the source country of goods supplied and the level of human rights protection in those countries.

During the reporting period Bonney Energy's key priorities have been to:

- engage an external trainer to provide a high level overview to the management team upon the introduction of the Modern Slavery Act 2018
- grow our knowledge and understanding of modern slavery including impacts on individuals, prevalence within Asia and the Pacific, and the Top 5 imported products at risk of modern slavery by consulting resources such as The Global Slavery Index 2018, Walk Free Foundation
- develop a Supplier Code of Conduct which sets out our expectations of our suppliers and contractors including:
 - Diversity and Equal Opportunity
 - Health & Safety
 - Labour, Human Rights and Modern Slavery
 - Anti-Bribery and Corruption
 - Environment & Sustainability
- commence review of our Supplier Management Procedure to ensure the criteria for supplier qualification incorporates an assessment of the supplier's ability to comply with the principles outlined in the Supplier Code of Conduct.

Assessment of Effectiveness

During this first reporting period Bonney Energy's focus has been on deepening our knowledge of modern slavery in order to develop an action plan which takes a continuous improvement approach to the development of systems to identify and manage risks within our supply chains. Assessment of modern slavery risk has been incorporated in Bonney Energy's annual Enterprise Risk Review process to ensure monitoring and ongoing development of the action plan is embedded in our risk management framework.

Other Relevant Information

Covid-19 Impacts

During the periods of lockdown in Victoria and Tasmania, Bonney Energy were classified as an essential service, with employees required to continue providing services to the community. A CovidSafe Plan was introduced with strict safety protocols including requirements for social distancing, regular cleaning and sanitising of vehicles and the workplace, requirements for testing and incident reporting. All staff were provided with relevant training and a high level of communication was maintained with all employees. Supplies of masks, antibacterial products and hand sanitiser were predominately sourced from Tasmanian manufacturers and suppliers.

Future Steps

Bonney Energy is committed to deepening our understanding of the impacts of modern slavery and increasing our awareness of potential risks within our supply chains. Actions in FY21 will be focused on:

- adopting the Supplier Code of Conduct
- ensuring Bonney Energy management, human resource and procurement teams are provided with appropriate modern slavery training including the criteria for supplier prequalification
- including criteria for evaluation of modern slavery risk in all future tenders for supply of goods or services
- increasing our engagement with major suppliers.

Approval

In accordance with s14(2) (d) this Statement was approved by the Board of Directors on 26th March 2021.



Lewis Wayne Bould

Managing Director

Bonney Energy Group Pty Ltd, Bonney Energy Victoria Pty Ltd
& Bonney Energy Corporate Pty Ltd