

Modern Slavery Statement Financial Year 2021

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 2021.

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.

Throughout this second reporting year we have strived to increase our awareness of the scale and human impacts of modern slavery through review of modern slavery information available from respected sources including the Walk Free Foundation and Be Slavery Free Australia. Information has been shared widely throughout the organisation via training modules incorporating videos such as the Be Slavery Free Australia educational material and the conversation on modern slavery has begun. We recognise we all have a role to play in ending the demand and supply of slavery through both our business decisions and personal choices.

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 employees at end FY21 being 109 in Victoria and 112 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*

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.

Focus during FY21 has been on Tier 1 risk which, based on geographic location and long-standing relationships with our major suppliers, is perceived to be low. However, we acknowledge that further engagement with key suppliers is required to understand where Tier 2 risks may be present due to source country of goods supplied, and the level of human rights protection in those countries.








The Global Slavery Index 2018 has been used as a source of guidance to identify potential Tier 2 risks. Included in the Top 5 products imported by Australia identified as being at risk of modern slavery are electronics (laptops, computers and mobile phones) and garments.

As a purchaser of uniforms and personal protective equipment future actions will include development of a Supplier Self-Assessment Questionnaire (SAQ) structured to identify where there may be the potential for Tier 2 modern slavery risks within this particular supply chain.

Product	Source country in order of value of imports
Garments	China, India, Vietnam, Thailand, Malaysia, Brazil, Argentina
Electronics	China & Malaysia

Source: The Global Slavery Index 2018, Walk Free Foundation

During FY20 Bonney Energy developed an action plan for FY21 to move towards assessing the risks of modern slavery practices occurring in our supply chains with key elements including:

Action	Status
Establish Modern Slavery Working Group	
Develop modern slavery awareness training tools	
Deliver training to management & procurement team	
Adopt Supplier Code of Conduct	
Review Supplier Management Systems to ensure requirements for compliance to our Supplier Code of Conduct are incorporated within the supplier pre-qualification process and systems for maintaining records established and monitored	
Engage with all new suppliers to assess their ability to comply with the Supplier Code of Conduct (Tier 1 Assessment)	
Commence risk assessment of Tier 1 suppliers with potential for modern slavery risk deeper within their supply chains	

Assessment of Effectiveness

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. Effectiveness is measured against our ability to achieve the objectives established in the action plan.

Future Steps

Bonney Energy continue to be committed to deepening our understanding of modern slavery and working with our suppliers to identify where there is the potential for the risk of modern slavery. We take a continuous improvement approach with the action plan developed in FY20 reviewed and updated to include key performance indicators for FY22 to effectively measure our progress.

Action	KPI
Extend modern slavery awareness training to all office based employees	% employees completed
Commence engagement with existing suppliers to assess their ability to comply with Supplier Code of Conduct (Tier 1 Assessment)	# suppliers contacted # suppliers responded
Engage with new suppliers to assess their ability to comply with the Supplier Code of Conduct prior to pre-qualification	100% all proposed new suppliers
Develop SAQ	Approved for use
Provide SAQ to all uniform providers (noted as potential Tier 2 risk)	# uniform suppliers # completed SAQ
Include modern slavery clauses in future supply contracts	% new contracts compliant

Covid-19 Impacts

We understand that where there is desperation the risk of modern slavery is increased, and that the Covid-19 pandemic has disrupted supply chains and caused more reasons why vulnerable workers may become desperate. As a consequence, there is the potential for more already vulnerable workers to become exposed to modern slavery (e.g. factory shutdowns causing loss of income, increased debt as workers are forced to stay at home during quarantine restrictions, excessive involuntary overtime as some factories experience huge spikes in demand for personal protective equipment).

Throughout the pandemic Bonney Energy's goods and services, including goods to protect our own workers (e.g. masks, hygiene and antibacterial products), have continued to be sourced from Australian based suppliers where Tier 1 risk is low. We do however recognise that there is still the potential for risk of modern slavery deeper within our local providers supply chains and we will continue to develop our systems to dive deeper into our supply chains as our risk assessment process evolves.

Approval

In accordance with s14(2) (d) this Statement was approved by the Board of Directors on 20th December 2021.

A handwritten signature in blue ink, appearing to read "Lewis Wayne Bould".

Lewis Wayne Bould

Managing Director

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

The Bonney Energy Supplier Code of Conduct may be accessed [here](#).