

MODERN SLAVERY STATEMENT

For the period 1 July 2023 to 30 June 2024

Fuel Distributors of Western Australia Pty Ltd

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Fuel Distributors

Of Western Australia Pty Ltd

INTRODUCTION:

This Modern Slavery Statement covers the activities of Fuel Distributors of Western Australia Pty Ltd ABN: 11 087 051 778 ("the reporting entity") for the period of 1 July 2023 to 30 June 2024.

This 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.

It is recognised that while Fuel Distributors of Western Australia 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

Fuel Distributors of Western Australia is part of the downstream petroleum industry. This industry includes.

- Fuel wholesale businesses, who source transport fuels in fuel trucks from terminals and depots to clients on farms, constructions sites and service stations.
- Fuel retail businesses, who retail transported fuels to customers at service stations. There are approximately 8000 retail fuel sites, or service stations in Australia (sources ACAPMA – Australasian Convenience and Petroleum Marketers Association <https://acapma.com.au/our-association/industry-at-a-glance/>)

The downstream petroleum industry in Australia is at 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.

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

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

THE REPORTING ENTITY:

The reporting entity is Fuel Distributors of Western Australia. The entity was founded Craig Burrows in April 1999 and run as a family business, with a single truck delivering fuel to customers, predominately within the farming, transport and construction industry.

Today Fuel Distributors of Western Australia is an integrated downstream petroleum entity with fuel transport operations, wholesale depots and fuel retail sites (service stations or unmanned payment terminals). Fuel Distributors of Western Australia directly employs approximately 150 employees across head office, retail sites and transport operations. The entity directly operates 6 retail sites (service stations), 6 wholesale depots and 38 fuel trucks.

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Fuel Distributors of Western Australia has 1 Commission Agent arrangement.

In 2015 Puma Energy, and subsequently Chevron Australia Downstream acquired 50% of the entity. Fuel Distributors of Western Australia is currently 50% owned by Chevron Australia Downstream and 50% owned by Craig Burrows. The entity reports to a board of directors.

This entity does not own or control any other entities.

RISKS OF MODERN SLAVERY PRACTICES IN INTERNAL OPERATIONS and SUPPLY CHAINS:

According to the 2023 Global Slavery Index, an estimated 1.6 in every thousand people were in modern slavery in Australia at any point in 2021. In terms of prevalence of modern slavery, Australia ranks 149th globally and 26th within Asia and the Pacific. Risks in relation to this slavery index are associated with sexual exploitation, forced labour or forced marriages. Source: (<https://cdn.walkfree.org/content/uploads/2023/09/27154835/GSI-Snapshot-Australia.pdf>)

The overall risk level in Australia is low according to the 2023 Global Slavery Index.

Fuel Distributors of Western Australia acknowledges the risks of modern slavery may be considered low in Australia however as a Company we strive to ensure this risk is minimised within our operations and those who supply us.

Internal operations:

Fuel Distributors of Western Australia has undertaken an assessment of the risks of modern slavery in internal operations, and they are considered to be low.

Fuel Distributors of Western Australia is committed to and complies with Australian employment and safety laws, which reduces the risk of modern slavery impacts. All employees directly employed by Fuel Distributors of WA, are employed under either an Enterprise Agreement, Award or Individual Contract.

To ensure these employment arrangements are compliant to relevant awards, agreements and legislation, Fuel Distributors of Western Australia actively participates in annual reviews of its employment and safety systems. Yearly audits are undertaken by the following industry associations:

- ACAPMA for all retail operations (service stations) - auditing employment conformance and training standards.
- Main Road for all transport operations - auditing safety conformance to relevant legislation.
- Independent financial audits (such as BDO) on Company practices - auditing employment practices of the entity against relevant awards and legislative requirements.
- CCIWA – annual review of Employment Agreements and HR policies and procedures, ensuring compliance with relevant legislation.

Commission Agency Arrangements:

A Commission Agency Arrangement is where an independent operator (usually a family business) operates a site and is branded as part of the entity network in a commission agent arrangement. Not technically a franchise' arrangement, it is nonetheless similar as there is a connection of branding, however the retail fuel site that is a commission agent does not own the fuel, their business simply receives a commission for selling the fuel on behalf of Fuel Distributors of Western Australia.

These separate businesses, engage, pay and manage their own staff. Whilst a separate businesses, it is recognised that commission agents can pose a risk to modern slavery as they are connected to Fuel Distributors of Western Australia. As such special engagement and requirements are entered into, including the entity requiring commission agencies to provide evidence of independent audits of employment and safety compliance.

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Fuel Distributors of Western Australia requires the Commission Agency to participate in bi-annual audits of their internal operation's employment and safety compliance, undertaken by the industry association ACAPMA.

Supply Chain:

Fuel Distributors of Western Australia is at the end of most of the supply chains it participates in and has a policy and operational approach to engage with and source products and services from Australian based entities in the first instance where-every practical, reducing the risk of modern slavery practices being present.

The primary supply chain of the entity involves the acquisition of bulk fuels from major fuel terminals in Perth. Fuel is purchased from petroleum producers/importers and distributed direct to customers or to storage locations for later on-sale.

The operations have variable other suppliers based on availability and is supplied from a broad range of industry sub-segments, including the following:

| | |
|-----------|---|
| Primary | <ul style="list-style-type: none"> Fuel Fuel System Equipment Labour Supply Sub-contractors Fuel Transport Vehicles Convenience store stock Convenience store equipment Electricity Water Communications technology Contractors for cleaning and vehicle servicing |
| Secondary | <ul style="list-style-type: none"> Fuel systems maintenance services Fuel Transport vehicles and maintenance systems and equipment Uniforms Software Promotional materials Office consumables |
| Tertiary | <ul style="list-style-type: none"> Subscriptions Legal services Taxation services Business and financial services Wate Management services |

Fuel Distributors of Western Australia does not import directly any items from outside of Australia, though it does note that some of its Australian suppliers may do so.

Fuel Distributors of Western Australia does not employ or engage any staff or workers outside of Australia.

ADDRESSING and REDUCING RISKS:

Fuel Distributors of Western Australia has, as part of this 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.

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During this, and future reporting periods Fuel Distributors of Western Australia has committed to the following:

Internal Operations:

Fuel Distributors of Western Australia has personnel and various polices, in place that support our day-to-day operations to ensure all employees meet our core values. These polices are under regular review to ensure as a company we value and observe all laws regarding corporate social responsibility, environmental and workplace safety protections, staff inclusion and diversity. Specifically, we are:

- Expanding internal communications on the risks of modern slavery,
- Expanding training on the risks of modern slavery to leaders in the operation,
- Communicating the modern slavery statement to staff,
- Communicating internal reporting mechanisms already in place available for reporting modern slavery concerns,
- Continuing with annual external employment and safety compliance auditing,
- Conducting yearly executive review of risks in operations and review of internal confidential reporting mechanisms.

Commission Agency:

Fuel Distributors of Western Australia intends to engage with Commission Agents who align to our core values and value and observe all employment and safety laws.

Specifically, we:

- Complied with commission agency arrangements undertaking a bi-annual audit of their internal operations employment and safety compliance, undertaken by the industry association ACAPMA

Supply Chain:

Where possible, Fuel Distributors of Western Australia endeavours to works with suppliers known to be of good standing and we expect our key suppliers to operate in accordance with Australia's applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking, and child labour. Specifically, we are:

- Expanding risk assessment to include supplier questionnaires to identify product origin and product origin risk factors
- Specifying modern slavery considerations in major supply contracts
- Reviewing modern slavery statements of major suppliers (once published) and
- Engaging with Industry associations to address any specifically identified areas of concern in the broader supply chain.

Any claims or instances of modern slavery will be addressed confidentially seeking advice from local industry association and government. Fuel Distributors of Western Australia recognises that we are not equipment to handle instances on our own.

Labour Hire / Subcontractors within our Supply Chain:

Fuel Distributors of WA employees the majority of the workforce directly and only engages labour hire or subcontractors to assist with manning in peak periods and to cover short term absences. This practice, along with risk management and auditing of compliance to relevant employment laws and industrial instruments, means the risk associated with engaging labour hire and subcontractors are minimised.

ASSESSING EFFECTIVENESS:

Fuel Distributors of Western Australia is committed to review the approach to modern slavery and all associated processes, polices and communications.

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Modern Slavery will be reviewed at executive meetings, in addition to this specific modern slavery statement preparation process which ensures ongoing review of systems and effectiveness.

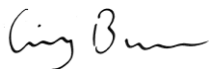
CONSULTATION:

Fuel Distributors of Western Australia has no associated entities, as such consultation on this statement was conducted internally by the General Manager prior to publication.

OTHER ITEMS:

This statement is only the second for Fuel Distributors of Western Australia. It is recognised this process is in its infancy and there is more work to be done for a broader engagement, assessment and communication program and that further steps will be required in the future and Fuel Distributors of Western Australia is committed to taking the steps required to do this small part in combating modern slavery.

This statement was approved by the board of Fuel Distributors of Western Australia on 29th January 2026.



Craig Burrows
General Manager and Managing Director
Fuel Distributors of Western Australia
29th January 2026