

MODERN SLAVERY STATEMENT

Introduction

This Modern Slavery Statement covers the activities of Kel Campbell Pty Ltd, which, for the purposes of Modern Slavery Reporting includes; Kel Campbell Pty Ltd ABN: 11 002 783 342 for the period of 1 July 2019 to 30 June 2020.

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.

It is recognised that while Kel Campbell Pty Ltd 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

Kel Campbell Pty Ltd 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, construction sites and service stations, and
- Fuel retail businesses, who retail transport fuels to customers at service stations. 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>

Entity

Kel Campbell Pty Ltd is a medium sized business which is a privately owned proprietary limited company and was established in 1984. Its core business includes Wholesale Distribution, Retail and Fuel Transport activities and operates 5 regional depots, 8 retail sites within a vast designated NSW regional area.

Kel Campbell Pty Ltd’s head office is located at 16 Flinders Street, Port Kembla NSW 2505.

As part of its normal operations, Kel Campbell Pty Ltd employs a total of 137 staff within the following business sectors:

- Head Office: 11 employed
- Retail: 69 employed
- Wholesale: 17 employed
- Transport: 40 employed and no sub-contractors

Supply Chain

Kel Campbell Pty Ltd 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 where ever 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 Convenience store stock Transport Equipment Convenience store Equipment Electricity Water Telecom
<u>Secondary</u>	Fuel Systems maintenance services Transport Equipment maintenance services Uniforms Software Promotional coordination service

	Promotional Materials Office consumables
<u>Tertiary</u>	Subscriptions Legal services Taxation services Business and financial services Waste management services

Kel Campbell Pty Ltd does not import any items from outside of Australia, though it does note that some of its Australian suppliers may do so.

Kel Campbell Pty Ltd does not employ any staff or workers outside of Australia.

Risks of modern slavery practices in operations and supply chains

Internal operations

Kel Campbell Pty Ltd 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, Kel Campbell Pty Ltd also actively participates in annual independent review of employment and safety compliance audits undertaken by the industry association ACAPMA.

Supply chains

Kel Campbell Pty Ltd is an Australian entity that sources its products and services from mostly Australian entities and suppliers, reducing the risk of modern slavery practices being present.

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.globalslaveryindex.org/2018/findings/country-studies/australia/>)

Assessing and Addressing Risk

Kel Campbell Pty Ltd 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 Kel Campbell Pty Ltd 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.

Kel Campbell Pty Ltd 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,
 - 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,
 - 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. Kel Campbell Pty Ltd recognises that we are not equipped to handle instances on our own.

Assessing Effectiveness

Kel Campbell Pty Ltd 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

Kel Campbell Pty Ltd has no associated entities, as such consultation on this statement was conducted entirely internally / 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 Kel Campbell Pty Ltd. 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 Kel Campbell Pty Ltd is committed to taking the steps required to do its small part in combating modern slavery.



Marcus Di Pietro

Chief Financial Officer

29/03/2021