



AA HOLDINGS

AA Holdings Pty Ltd

ACN 112 233 744
ABN 94 112 233 744

115 Sackville Street
Collingwood Victoria 3066

AA HOLDINGS PTY LTD MODERN SLAVERY STATEMENT

Date: 30 December 2024

This Modern Slavery statement covers the activities of AA Holdings Pty Ltd (ABN 94 112 233 744) for the period of 1 July 2023 to 30th June 2024 and is published in compliance with our obligations pursuant to the *Modern Slavery Act 2018 (Cth)*.

This statement 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.

Although it is recognized that AA Holdings 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 these matters, leads to greater awareness and action and thus potentially better outcomes.

About AA Holdings

AA Holdings Pty Ltd (AA Holdings) owns and operates a network of Petrol Stations within the inner and outer suburbs of Melbourne.

AA Holdings designs, constructs and licenses retail outlets, providing BP branded fuel products, convenience shop items, and carwash facilities which operate 24 hours, 7 days a week. AA Holdings is committed to meeting customer requirements by providing quality, branded products, fast professional service, and a well-presented chain of modern retail stores.

AA Holdings is a responsible community member and is mindful of the opinions of its neighborhoods'. We construct and operate facilities which observe applicable environmental standards and regulatory requirements.



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Each year AA Holdings supports various charity organisations which include the Salvation Army, Royal Melbourne Hospital Diabetes and Endocrinology Department, Royal Childrens Hospital, OZ Harvest and McGrath Foundation.

AA Holdings Pty Ltd is a part of the downstream petroleum industry which is categorized by high volume sales of fuel at low margins (ACCC 2020).

More information on the operation of the downstream petroleum industry refer to:

- ACAPMA – Australasian Convenience and Petroleum Marketers Association – <https://acapma.com.au/>
- ACCC Financial performance of the Australian downstream petroleum industry 2002-2018, April 2020 – <https://www.accc.gov.au/system/files/Financial%20performance%20of%20the%20Australian%20downstream%20petroleum%20industry%202002%20to%202018.pdf>

Structure

AA Holdings is an Australian family-owned business which is led by its management team who oversee the day-to-day operations of the company. The structure of the reporting entity remains unchanged since our previous Modern Slavery Report. The AA Holdings head office is located at 115 Sackville Street, Collingwood VIC 3066.

Overarching AA Holdings' organisation and governance structure is the company's policies and procedures, culture and values and business processes and risk management.

AA Holdings currently employs 49 employees.

Operations

AAHoldings is part of the downstream petroleum industry. This industry includes:

- Fuel wholesale businesses who source and transport fuels in trucks from terminals and depots to customers; and
- Fuel retail businesses who sell transportation fuels to customers at service stations; and
- Total supply which comprises refining, importing and buy-sell transactions between refiners.



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The downstream petroleum industry in Australia is at the end of a long supply chain in terms of its key inputs being fuel, equipment in relation to fuel supplies, storage and pumps and convenience store equipment and shop product offerings.

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 are independent, family operated businesses many of which are small to medium in size.

Supply Chain

AA Holdings is at the end of most of the supply chains it participates in and as a proud Australian business, AA Holdings is committed to engaging Australian suppliers wherever possible.

AA Holdings appreciates that it is at the end of a global supply chain which constitutes services (and labour) that are sourced in Australia and overseas. Although AA Holdings does not import any items from outside Australia directly it does note that some of its Australian Suppliers do import items directly from manufacturers overseas.

Procurement is centralized via Head Office for all suppliers and our supply chain arrangements remain largely unchanged from the previous reporting period.

Our supply chain relationships continue to consist of a broad range of industry segments which includes suppliers from the following sectors:

- Consulting and Contractor Services, Corporate Clothing, Motor Vehicle Management and maintenance, Information Communications and Technology, Logistics and Transport, Marketing, Office Cleaning, Office Supplies and Consumables, Print and Promotional Goods and Services, Property Services, Travel and Recruitment.
- Fuel and associated fuel system equipment, storage, and maintenance.
- Convenience store equipment/ fixtures and convenience retail products, Shop Signage.
- Electricity, water, telecommunications, waste and environmental management services.
- Uniforms, Subscriptions, legal and taxation services.

AA Holdings recognises the services that contribute to its own goods and services extend beyond those received from direct suppliers as it also includes goods and services used by indirect suppliers.



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The major suppliers are:

- Fuel products - bp Australia Pty Ltd (BP), Castrol
- Convenience shop products - Coca Cola, Schweppes, Imperial Tobacco, Philip Morris, Mars Australia, Mondelez, Unilever Australia, Bega Dairy & Drinks, PFD, Lavazza, Repco

Assessing and addressing modern slavery risks

AA Holdings continues to assess the risks of modern slavery across its operations with the risk considered low as its workforce is in Australia and remains unchanged from the previous reporting period. AA Holdings maintains its commitment to, and the compliance with, Australian Employment and safety laws which reduces the risk of modern slavery impacts.

As part of the AA Holdings ongoing Dealer arrangement with bp Australia it is a condition that as a Dealer site we continue to participate in the annual Assisted Compliance Audit Program which is provided by ACAPMA. ACAPMA uses an external third-party auditor to carry out checks on working conditions on site, including salary and right to work checks. These audits have been completed for the current reporting period.

The AA Holdings service station network continues to operate under a commission agent arrangement. The commission agent is a separate business receiving fuel commissions for selling fuel on behalf of AA Holdings. These separate businesses engage, pay, and manage their own staff. While they are a separate business it is recognized that they pose a risk of modern slavery connected to AA Holdings and as such special arrangements and requirements, including the requirement to provide evidence of annual independent audit of employment and safety compliance, is undertaken. These audits have been completed for the current reporting period.

Apart from these internal and external audits AA Holdings also has a Whistleblower Policy to assist in managing the risks of modern slavery. This policy has been established to encourage employees to report misconduct including behaviour that is unethical, corrupt, or illegal from within the company's operations or those of suppliers and contractors, without fear of retaliation.

Supply of automotive fuels

As AA Holdings continues its long-standing relationship with bp Australia for the supply of automotive fuels for sale to end users it is identified that bp sources these products from a range of domestic and international suppliers.



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As part of AA Holdings ongoing commitment to increase the effectiveness of its modern slavery approach AA Holdings continues to focus on familiarizing itself with bp Australia's Modern Slavery Statement each reporting period and the processes and actions bp has taken since the last reporting date in its ongoing commitment in supporting the elimination of modern slavery.

As part of the review of the current bp Australia Modern Slavery Statement it is noted that bp continues to insert modern slavery clauses to new contracts as well as any extensions and supply variations to assist with the management of modern slavery risk. The statement also provides further details of bp's continued regular review and monitoring of its risk management system and any actions taken during 2023 in relation to supplier due diligence. Therefore, being part of bp's Dealer Network provides AA Holdings with some benefit of risk management because of the due diligence undertaken by bp in relation to its suppliers and also in relation to the trading and shipping operations in its supply chain.

In addition, AA Holdings continues to be represented at the bp Australia quarterly Dealer meetings, as well as the annual independent business partners' conference, where identified issues can be raised and discussed.

Supply of Convenience Store products

As part of the modern slavery risk assessment for the current reporting period there was a continued focus on the review of the Modern Slavery Statements of those suppliers that provide the convenience store products offered across our service station network to better understand how they manage their supply chain for the products they supply to AA Holdings.

This review provides an opportunity for us to understand those areas within the supply chain that our suppliers have identified pose the greatest risk to modern slavery and their actions taken, and/or proposed plans to mitigate modern slavery risk within their operations and supply chains.

The due diligence processes undertaken by suppliers also provides AA Holdings with the benefit of assessing and identifying modern slavery risk along with the processes for mitigating modern slavery risk.

Suppliers of Construction and Building services

As part of the current reporting period there has been a focus on reviewing those suppliers who provide services in relation to construction and building (including trades such as plumbers and electricians) due



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to possible risks of modern slavery in relation to subcontractors' labour standards and the sourcing of manufactured at-risk products from high-risk countries.

The construction and building services engaged by AAHoldings are mostly local, small, family-owned businesses with no overseas operations and therefore their workforce is in Australia. The inherent level of risk of modern slavery within these businesses is considered low given the workplace protections provided by the enforcement of industrial relations laws in Australia. However low risk does not mean no risk as there is potential that these businesses may operate with reduced corporate governance and management which may lead to a possibility of engaging at risk workers such as low-skilled and/or migrants holding temporary visas, or sourcing manufactured products from high-risk countries.

We have a high level of direct oversight of our onsite operations during periods of building and construction works as we also have company employees attending the onsite works. As a result, this provides us with direct oversight of the contractors engaged to complete these works, which then enables us to enforce policies and controls to protect others from harm.

Also, as many contractors are engaged on an hourly rate basis efforts are made to ensure that the rates paid are within industry standards and expectations. Therefore, we consider the risk of modern slavery to be low in these circumstances.

Assessing effectiveness

During the review of construction and building service providers it was noted that there is certain product categories used as part of these works such as plumbing and electrical supplies which could pose risks in the supply chain due to being associated with industries which are largely skill based or have outsourced workforces, or production/manufacturing facilities located outside of Australia. This will be the focus for the next reporting period.



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AA Holdings acknowledges that any claims or instances of modern slavery will be addressed with confidentiality, and with assistance from the industry association and government. AA Holdings recognizes that it is not equipped to handle instances regarding Modern Slavery on its own.

AA Holdings has consulted on the content and form of this statement with all associated entities, and it was approved by the sole director on 19th December 2024 prior to publication.

This Statement was approved on the 19th of December 2024.

Andreas Andrianopoulos
Sole Director
AA Holdings Pty Ltd