

Endeavour Petroleum

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Modern Slavery Statement

Introduction

This Modern Slavery Statement covers the activities of Endeavour Petroleum Pty Ltd atf Purwey Unit Trust ABN 99 040 012 336 (Endeavour Petroleum) for the period of 1 July 2020 to 30 June 2021.

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 Endeavour Petroleum 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.

Endeavour Petroleum is a family owned and operated business operating within the Petroleum Industry since 1992. Within Victoria, Endeavour Petroleum owns and operates 17 retail service stations, a retail liquor business and 4 unmanned Fuel facilities. One of these facilities is a fuel depot with 3 fuel trucks delivering fuel to customers. In NSW we have 1 unmanned Fuel Facilities and in SA we have 1 Truck stop. The company is expanding it's operations nationally and is developing it's own fuel brand – Endeavour.

About

Industry

Endeavour Petroleum 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

Endeavour Petroleum is a family-owned and operated business head office at 41 Peninsula Blvd Seaford VIC 3198. Endeavour Petroleum was established in 1992 and has retail and wholesale fuels sites across Victoria most of these sites in regional areas. Recently Endeavour has moved into SA with a Truck stop at Mt Gambier and also NSW with an unmanned site in Moama.

Employing approx. 22 number of staff at head office as well as 250 number of staff in our retail sites including 4 truck drivers

Supply Chain

Endeavour Petroleum 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 were 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 Fuel Transport Vehicles Convenience store stock Convenience store Equipment Electricity Water Telecom Commission Agent Stores Contractor/subcontractor Drivers Lubricants
<u>Secondary</u>	Fuel Systems maintenance services Fuel Transport Vehicle maintenance service Uniforms Software Promotional coordination service Promotional Materials Office consumables Trailer hires
<u>Tertiary</u>	Subscriptions Legal services Taxation services Business and financial services Waste management services

Endeavour Petroleum does not import any items from outside of Australia, though it does note that some of its Australian suppliers may do so / imports several items directly from manufacturers overseas, the vast majority of suppliers are Australian suppliers.

Risks of Modern Slavery Practices

Low risk:

- Supply of petroleum products is considered low risk given the nature of sale of imported products ex refinery and domestically. Further includes Fuel Wholesalers/ Distribution Fuel, Road Transport & Logistics, Retail Service Stations, Lubricant's sales, Trailer hire and Staff.
- Potential areas of higher risk: Supply of consumables, cleaning products, uniforms, marketing materials, Retail sites with brand agreements and retail service station shop products for resale.
- Procurement is centralised via our Head Office for all suppliers.

Risks of modern slavery practices in operations and supply chains

Internal operations

Endeavour Petroleum 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, Endeavour Petroleum also actively participates in annual independent review of employment and safety compliance audits undertaken by the industry association ACAPMA.

Endeavour Brand Agreements

Endeavour Petroleum partners with other businesses who operate sites owned/branded as part of the entity network in a Commission Agent arrangement. Not technically a franchise arrangement, it is nonetheless similar in that there is a connection of branding, however the retail fuel site that is a commission agent does not own the fuel, their business simply receive a commission for selling the fuel on behalf of Endeavour Petroleum. These separate businesses engage, pay and manage their own staff. While separate businesses it is recognised that they pose a risk of modern slavery connected to Endeavour Petroleum and as such special engagements and requirements, including requirement to provide evidence of annual independent audit of employment and safety compliance, has been undertaken.

Supply chains

Endeavour Petroleum 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/>)

Due Diligence actions taken.

Staff undertake industry training through ACAPMA
Branding agreements demands that businesses must act in a lawful manner.
Trade practices policy
Equal Opportunity Policy
Privacy Policy
Code of Conduct policy
Confidentiality policy

Assessing and Addressing Risk

Endeavour Petroleum 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 Endeavour Petroleum 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.

Endeavour Petroleum 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. Endeavour recognises that we are not equipped to handle instances on our own.

Assessing effectiveness of Actions

Meetings with site level staff
Monthly Management meetings with Executive team
Frequent sites and suppliers' audits

Assessing Effectiveness

Endeavour Petroleum 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

As a part of this process all suppliers and contractors who deal with other interrelated companies will assessed under this same criterion as Endeavour Petroleum suppliers and contractors

Other Items

This statement is the first for Endeavour Petroleum. 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 Endeavour Petroleum is committed to taking the steps required to do its small part in combating modern slavery.

This statement was approved by Jeffery Guy Griffiths as the Sole Director of Endeavour Petroleum Pty Ltd.



Jeffery Guy Griffiths
Sole Director
22nd December 2021