



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 2025

This modern slavery statement (statement) covers the activities of AA Holdings Pty Ltd (ABN 94 112 233 744) (AA Holdings) for the period of 1 July 2024 to 30th June 2025 and is published in compliance with our obligations pursuant to the *Modern Slavery Act 2018 (Cth)* (the Act).

This statement outlines the actions taken to assess and address modern slavery risks in internal operations and external supply chains for this reporting period, and forms part of a program of commitment to further engagement and development over time.

Although it is recognized that AA Holdings 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 in relation to these matters, leads to greater awareness and action and thus potentially better outcomes. AA Holdings is committed to ensuring that its approach to addressing modern slavery is consistent with best practice and its obligations under the Act.

To the extent that the contents of this statement refer to obligations on AA Holdings, they are guidelines for management or summaries of applicable legislative requirements only, and are not contractual terms, conditions or representations on which a staff member or other party may rely.

About AA Holdings

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.



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

In addition to its business operations, each year AA Holdings supports various charity organisations which include, but not limited to, the Salvation Army, Royal Melbourne Hospital Diabetes and Endocrinology Department, Royal Childrens Hospital, OZ Harvest and McGrath Foundation.

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

For 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%20Aust%20ralian%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 its day-to-day operations. The structure of AA Holdings remains unchanged since our previous modern slavery report submitted to the Modern Slavery Register on 30 December 2024. 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 50 employees.

Operations

AA Holdings 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



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- 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.

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.



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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.

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 and assessing effectiveness of actions taken to address such risks

AA Holdings continues to assess the risks of modern slavery across its operations. The risk within its own operations is considered **low** as its workforce is in Australia and its composition remains unchanged from the previous reporting period. AA Holdings maintains its commitment to, and the compliance with, Australian employment and safety laws as part of its approach to reduce the risk of modern slavery impacts.

Despite this assessment, AA Holdings recognizes that there are residual risks, particularly outside its own operations and further upstream in its supply chains. This may be where, for example, third party service providers are used (eg. cleaning, maintenance, security or transport) or where workers are culturally or linguistically diverse, new to Australia, young or are otherwise vulnerable.

In summary, this means that AA Holdings considers the most likely modern slavery risks to materialize are risks that AA Holdings will be directly or indirectly linked to modern slavery practices (as opposed to risks that AA Holdings will itself cause or contribute to modern slavery practices).

As part of AA Holdings ongoing dealer arrangement with BP, it is a condition that as a dealer site we continue to participate in the annual Assisted Compliance Audit Program which is provided by the Australian Convenience and Petroleum Marketers Association (**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, and the results of such audits assist with our assessment of the effectiveness of our actions taken to assess and address modern slavery risks.



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AA Holdings service station network continues to operate under a commission agent arrangement. The commission agents are independent businesses responsible for engaging and managing their own staff. While not related entities, AA Holdings recognises the potential modern slavery risk associated with these arrangements 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, and these audit outcomes are used to assess the effectiveness of AA Holdings' risk mitigation measures.

In addition to 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 AA Holdings operations or those of its suppliers and contractors, without fear of retaliation. AA Holdings monitors the number and details of any reports under its Whistleblower Policy annually, which assists with identifying where to prioritize due diligence, supplier engagement, training and remediation efforts and is another means of enabling AA Holdings to assess the effectiveness of its actions taken to assess and address modern slavery risks.

Specific actions taken to address modern slavery risks in relation to various parts of AA Holdings' supply chain are detailed below.

Supply of automotive fuels

As AA Holdings continues its long-standing relationship with BP 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.

As part of AA Holdings' ongoing commitment to strengthen the effectiveness of its modern slavery approach, AA Holdings continues to familiarize itself, each reporting period, with BP's Modern Slavery Statement, including the processes and actions BP has taken since the last reporting date in its ongoing commitment to support the elimination of modern slavery. Any updates to BP's Modern Slavery Statement inform updates to this Statement since AA Holdings' last reporting period.

As part of our review of BP's current Modern Slavery Statement, it is noted that the Statement outlines measures such as contractual modern slavery clauses, supplier due diligence, and ongoing monitoring of trading and shipping operations. Its statement also provides further details of BP's continued regular review and monitoring of its risk management system and any actions taken during 2024 in relation to



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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 which can also be used by AA Holdings to assess the effectiveness of the actions we have taken, or need to take, to address risks of modern slavery as relevant to our position in the overall supply chain.

In addition, AA Holdings continues to be represented at the BP quarterly dealer meetings, as well as the annual independent business partners' conference, where identified issues can be raised and discussed. Any issues raised and discussed at such meetings and conferences inform any remedial action that AA Holdings may need to take in relation to risks or incidents of modern slavery, if required. If the same or similar issues are raised at each meeting or conference as applicable to AA Holdings, this may highlight that more action is required. Conversely, where previous issues appear to have been resolved, this is one means by which AA Holdings can be satisfied that its action to address risks of modern slavery have been effective.

Supply of Convenience Store products

As part of AA Holdings' modern slavery risk assessment for the current reporting period there was a continued focus on the review of the modern slavery statements of any suppliers that provide convenience store products offered across our service station network to better understand how they manage their supply chain and risks of modern slavery in relation to 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 inform AA Holdings' approach to assessing and identifying modern slavery risk both in its own operations and in its supply chain more generally, along with the processes or actions AA Holdings identifies are required to mitigate modern slavery risk.

Suppliers of Construction and Building services

As part of the current reporting period, we have continued to focus on reviewing those suppliers who provide services in relation to construction and building (including trades such as plumbers and electricians) due to possible risks of modern slavery in relation to subcontractors' labour standards and the sourcing of manufactured at-risk products from high-risk countries.



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The construction and building services engaged by AA Holdings 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.

AA Holdings maintains direct oversight of construction activities during periods of building and construction works with company employees present onsite. This enables monitoring of working conditions and enforcement of 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 and that they comply with minimum legislative requirements. Therefore, we consider the risk of modern slavery to be low in these circumstances.

In previous reporting periods, a review of construction and building service providers noted that there were certain product categories used as part of construction works such as plumbing and electrical supplies which could pose an elevated risk of modern slavery practices in the supply chain due to being associated with industries which are largely skill based or have outsourced workforces, or have production/manufacturing facilities located outside of Australia.

We have focused on these risks in this past reporting period and AA Holdings approach is to prioritise engagement with suppliers that demonstrate a commitment to ethical labour practices and compliance with applicable modern slavery laws and regulations. AA Holdings addresses these risks by:

- Assessing supplier risk based on factors such as country of origin, nature of goods supplied and known industry risk profiles; and
- Relying, where appropriate, on the due diligence processes and modern slavery frameworks of trusted partners and manufacturers, including those with established modern slavery statements and governance practices; and
- Maintaining ongoing supplier relationships and monitoring any identified or emerging modern slavery risks.



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AA Holdings assesses the effectiveness of this supplier due diligence through:

- periodic reviews of supplier information and modern slavery statement; and
- consideration of changes in supplier risk profiles, including changes in sourcing locations, manufacturing practices and ownership structures; and
- review of any reported concerns, grievances, or incidents relating to labour practices, whether raised internally, by suppliers, or through publicly available information.

Given the indirect nature of many supply chain relationships, AA Holdings acknowledges that assessing effectiveness is an evolving process. AA Holdings is committed to refining its approach where relevant by identifying gaps and aligning with emerging regulatory guidance and best industry practice.

Looking Ahead

Looking ahead, AA Holdings will regularly review the risks of modern slavery within its operations, including:

- Periodic assessment of human resources and recruitment processes to ensure compliance with applicable legislation (including employment, equal opportunity and safety legislation and applicable industrial instruments); and
- Review of its policies and procedures; and
- Monitoring the effectiveness of staff training and awareness of human rights and modern slavery, to an extent appropriate for an individual staff member's role.

AA Holdings will continue to assess the effectiveness of its actions taken to address modern slavery risks, by tracking its actions and outcomes but also by partnering with its suppliers and other stakeholders within its supply chain.



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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 (including any entity it owns or controls), and it was approved by the sole director on 30th December 2025 prior to publication.

This Statement was approved on the 30th December 2025.

Andreas Andrianopoulos
Sole Director
AA Holdings Pty Ltd