



modern slavery statement 2020

Chevron Australia Downstream Holdings Pty Ltd, Chevron Australia Downstream Pty Ltd,
Chevron Australia Products Pty Limited, Chevron Australia Downstream Fuels Pty Ltd and
Directhaul Pty Limited

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1 Introduction

The *Modern Slavery Act 2018* (Cth) requires certain businesses to disclose their efforts to address the issue of forced labour and human trafficking in their business operations and supply chains. The law was designed to increase consumers' knowledge about products they buy and the companies they choose to support.

This Modern Slavery Statement (**Statement**) is made by Chevron Australia Downstream Holdings Pty Ltd (ACN 637 003 662), Chevron Australia Downstream Pty Ltd (ACN 637 005 059), Chevron Australia Products Pty Limited (ACN 147 978 890), and CAPPL's wholly-owned subsidiaries Chevron Australia Downstream Fuels Pty Ltd (ACN 009 644 151) and Directhaul Pty Limited (ACN 009 652 260) (together, the **Reporting Entities**) for the reporting period 1 January 2020 to 31 December 2020 (**Reporting Period**).

2 The structure, operations and supply chains of the Reporting Entities

2.1 Corporate Structure

Chevron Australia Downstream Holdings Pty Ltd (**CADHPL**) is a company limited by shares, incorporated and domiciled in Australia. Its registered office is C/- King & Wood Mallesons, Governor Phillip Tower, Level 61, 1 Farrer Place, Sydney, NSW, 2000. CADHPL is the holding company for Chevron Australia Downstream Pty Ltd (**CADPL**). Chevron Australia Products Pty Limited (formerly Puma Energy (Australia) Holdings Pty Ltd) (**CAPPL**) is a wholly-owned subsidiary of CADPL. Its registered office is C/- Boardroom Pty Ltd, Grosvenor Place, Level 12, 225 George Street, Sydney, NSW, 2000. Chevron Australia Downstream Fuels Pty Ltd (formerly Puma Energy (Australia) Fuels Pty Ltd) (**CADFPL**) and Directhaul Pty Limited are wholly-owned subsidiaries of CAPPL (**Directhaul**).

In July 2020, Chevron re-entered the downstream petroleum market in Australia through CADPL's acquisition of Puma Energy (Australia) Holdings Pty Ltd. The new downstream organisation is collectively known as "**Chevron Australia Downstream**". When we refer to "**we**" or "**our**" in this statement it is a reference to Chevron Australia Downstream.

The Reporting Entities are indirect subsidiaries of Chevron Corporation. Where this Statement refers to "**Chevron**" it is a reference to the Chevron Corporation and its direct and indirect subsidiaries.

Chevron is one of the world's leading integrated energy businesses. Chevron and its subsidiaries explore for, produce and transport crude oil and natural gas; refine, market and distribute transportation fuels and lubricants; manufacture and sell petrochemicals and additives; and develop and deploy technologies that enhance business value in every aspect of the company's operations.

Chevron's success is driven by a dedicated, diverse and highly skilled global workforce united by the vision, values and strategies of The Chevron Way and a commitment to deliver industry-leading results in any operating environment.

2.2 Operations

The Reporting Entities' principal operations are the procurement, storage, distribution, marketing and sale of petroleum products and operation of retail service stations, cafes and restaurants. A high-level overview is set out below:



Procurement / Supply

Refined petroleum products, including fuels and lubricants, are sourced and imported from CADFPL's fuel suppliers international refineries, which are transported by CADFPL's fuel suppliers to CADFPL's bulk fuel storage terminals in Australia. CADFPL also sources products domestically.



Storage

Petroleum products are stored at our seaboard import terminals and in-land storage depots. CADFPL own or have access agreements for a national infrastructure network comprising seaboard import terminals, storage tanks, and depots positioned in key locations across metropolitan and regional Australia.



Distribution

Petroleum product is transported from CADFPL's terminals and depots to CADFPL's commercial customers and service station sites within the Chevron Australia Downstream retail network.



Fuels and Lubricant Marketing

Fuel products are marketed and sold to retail customers through the Chevron Australian Downstream network of over 360 company-operated and retailer-operated service station sites, predominantly operated under the Puma Energy brand.



Fuel and lubricant products are supplied directly to commercial customers in the mining and resources, agriculture, construction, transport, marine bunkering and aviation industries.

CADPL operates two main business segments – retail and commercial – and provides management and support functions through its corporate business unit.



Retail

Fuel products are marketed and sold to retail customers through the Chevron Australian Downstream network of over 260 retail service station sites, predominantly operated under the Puma Energy brand. CADFPL operates 220 of the retail service station sites – 198 as company-operated (COCO) and 22 as retailer-operated (CORO) business models. There are also approximately 43 retailer-owned and operated (RORO) sites licensed to operate under the Puma Energy brand by way of supply and branding arrangements. Throughout the company-operated retail network, there are 211 convenience stores, some with cafes and restaurants, offering multiple convenience and non-fuel products, including takeaway and packaged food and snacks, household grocery, tobacco, hot and cold beverages, confectionary, car washes and ATMs.



Commercial

We own and operate key seaboard import terminals, in-land storage depots, 36 Puma Energy branded unmanned fuel facilities and a proprietary haulage business, Directhaul. CADFPL supplies fuel, oils and lubricant products, fuel equipment and related services to commercial customers in the mining and resources, agriculture, construction, transport, marine bunkering, and aviation industries, including to approximately 60 unbranded RORO sites.



Directhaul

CAPPL's wholly-owned haulage business Directhaul, is an industry leader in the safe and efficient transport of bulk fuels and gas in Australia with transport operations in 20 locations across the Northern Territory, Queensland, Victoria, South Australia and Western Australia. With a specialised transport fleet consisting of more than 100 trucks and 290+ trailers, Directhaul delivers over 1.6 billion litres of fuel products per year, to both Chevron Australia Downstream retail and commercial customers, as well as offering fuel transport services to third parties.



Corporate

Other business units within the Reporting Entities operations include corporate affairs and marketing, property and asset management, project management & engineering, business development, HSE, and support functions including customer service, finance, procurement, HR, IT, legal and compliance.

CAPPL also has a non-operated working interest in Fuel Distributors of Western Australia Pty Ltd (FDWA). FDWA is one of Western Australia's largest distributors of bulk fuels and lubricants to Perth and rural Western Australia, supporting CADFPL's logistics activities in Western Australia and completing the majority of retail fuel movements from terminal to CADFPL's retail network.

CAPPL, through its subsidiaries, directly employs approximately 2,344 employees across the business.

- Approximately 1,950 of the total employees are retail service station site staff employed as site managers, console operators and kitchen supervisors within the COCO retail network throughout Queensland, Western Australia, the Northern Territory, New South Wales, Victoria and South Australia.
- Directhaul employs approximately 165 employees, primarily located in Queensland, Western Australia and the Northern Territory. These employees include truck drivers, mechanics, warehouse supervisors, and professional and administrative disciplines which support Directhaul's logistic operations.
- The remaining approximate 229 employees, are located in Queensland, Western Australia, the Northern Territory, Victoria and New South Wales, and include oil and gas industry professionals employed in engineering, operations, logistics, sales, professional and administrative disciplines.

The Reporting Entities' supply chain personnel are based in Brisbane, Queensland. Additionally, CADPL may enter into services agreements with other indirect affiliates of Chevron Corporation that provide supply chain contract administration and other services to the Reporting Entities.

2.3 Supply Chains

During the Reporting Year, the Reporting Entities engaged approximately 1,500 first tier suppliers. The following table provides a high-level overview of industry categories relevant to the Reporting Entities' supply chains.

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Chevron Australia Downstream

	Category	Supply Chain	Reporting Entity
1.	Procurement, Storage and Distribution of Petroleum Products	<ul style="list-style-type: none"> Petroleum product supply, including fuel, lubricants, biofuels, additives. Shore based Facilities & Operations Road transport services Customs Brokerage / Warehousing / Freight Forwarding 	<ul style="list-style-type: none"> CADFPL CADFPL CADFPL CADFPL
2.	Terminal Operations	<ul style="list-style-type: none"> Technology hardware Manufacturing Major services contractors / consultants Operations Maintenance Facilities Engineering Environmental services Materials Real estate and facilities Safety clothing, uniforms and equipment 	<ul style="list-style-type: none"> CADFPL CADFPL CADFPL CADFPL CADFPL CADFPL CADFPL CADFPL CADFPL
3.	Commercial and Logistics Operations	<ul style="list-style-type: none"> Fuel equipment Fuel technology hardware Road transport services Vehicles Vehicle materials / parts, including tyres Major services contractors Safety clothing, uniforms and equipment 	<ul style="list-style-type: none"> CADFPL CADFPL CADFPL Directhaul Directhaul CADFPL & Directhaul CADFPL & Directhaul
4.	Retail Operations	<ul style="list-style-type: none"> Construction services Manufacturing Facility management / maintenance Major services contractors / consultants Commercial real estate and facilities Environmental services Fuel equipment Convenience store equipment Kitchen and cafe equipment Packaging, including plastic and paper bags, plastic food containers, coffee cups, coffee trays. 	<ul style="list-style-type: none"> CADFPL CADFPL CADFPL CADFPL CAPPL & CADFPL CADFPL CADFPL CADFPL CADFPL CADFPL

	Category	Supply Chain	Reporting Entity
4.	Retail Operations (cont.)	<ul style="list-style-type: none"> Convenience and non-fuel products, including food and household groceries, general merchandise, technology items, automotive products, telecommunications, tobacco, beverages, magazines, newspapers, pre-paid and gift cards. Safety clothing, uniforms and equipment Utilities, including electricity, water 	<ul style="list-style-type: none"> CADFPL CADFPL CADPPL & CADFPL
5.	Corporate Overheads	<ul style="list-style-type: none"> Professional services, including financial, legal, medical, insurance and HR services IT infrastructure support, software and hardware Safety clothing, uniforms and equipment Telecommunications Recruitment and labour hire Office services and equipment Property development and leasing Marketing and advertising, including promotional materials and goods Travel and accommodation Facilities management / maintenance 	<ul style="list-style-type: none"> CADPL & CAPPL CAPPL CAPPL CAPPL CADPL & CAPPL CAPPL CAPPL CADPL CADPL CADPL

The majority of the Reporting Entities' first tier suppliers are Australian entities, supplying products and services from Australia and other jurisdictions – the primary exception being the suppliers of petroleum products which are sourced from the Australian and international oil majors, as well as through Chevron's integrated supply chain.

Most suppliers are required to have their subcontractors approved before they can start work. A number of suppliers that contract with the Reporting Entities have broader contractual relations with Chevron Corporation or its subsidiaries.

Across CADFPL's COCO retail network, the majority of goods and services available to customers are procured and managed centrally by CADFPL. CORO and Puma Energy branded RORO sites have the option to procure the same products as COCO sites by independently contracting with CADFPL's suppliers, as well as having other supply chain relationships allowing them to directly procure and sell their own goods and services to their customers. This Statement does not cover the supply chain relationships of CORO or RORO sites except to the extent that those suppliers are also the suppliers of CADFPL.

3 Risks of modern slavery practices

3.1 In operations

The Reporting Entities' operational modern slavery risk is low. Most of the Reporting Entities' employees are employed directly on permanent or casual contracts. The Reporting Entities' employees and contingent labour workforce are predominantly oil, gas and logistics industry professionals, administrative professionals and retail service station site staff, located in Queensland, Western Australia, the Northern Territory, New South Wales, Victoria, and South Australia.

The Reporting Entities consider that, as a result of recruitment, remuneration and compliance programs, there is low risk that any of their employees are enslaved. Similarly, the Reporting Entities' contingent labour workforce is supplied by reputable global and national agencies who are required to comply with domestic and international laws.

Retail Network

While the COCO retail network contains a large casual workforce, the same recruitment, remuneration, and compliance programs described above apply to COCO employees, and the Reporting Entities consider there is low risk that any of the COCO employees are enslaved.

None of the employees in the CORO and RORO networks are employed directly by the Reporting Entities or their subsidiaries. The full-time, part-time and casual employees working at CORO and RORO sites are hired and employed directly by the entities operating these retail sites, which means that the Reporting Entities do not have complete visibility and control over these employees or their employment terms.

CADFPL is also responsible for selecting preferred products that its retail partners may or may not use. Those suppliers are common to CADFPL's supply chain – these risks are described further below in section 3.2.

3.2 In supply chains

The Reporting Entities' assessment of risk this year focused on first tier suppliers and was based upon industry risk. The Reporting Entities commenced the assessment by reviewing publicly available material in relation to modern slavery risk in the petroleum product supply and convenience retail sector. Through this material, the Reporting Entities identified classes of suppliers that are high risk and then reviewed the first-tier suppliers to identify those within these classes. This process provided an initial, industry-based, assessment of modern slavery risk.

As a result of this process, the Reporting Entities identified the following classes of higher risk suppliers:

- Road transport services
- Third party shipping, logistics and warehousing
- Construction services / materials
- Vehicle materials – Tyres
- Clothing / uniforms

- Labour hire / outsourcing
- Services – catering / cleaning
- Facilities management / maintenance
- Technology hardware
- Tobacco
- Confectionary
- Coffee
- Bakery
- Fresh food / food on-the-go

Modern slavery risks may also exist in the supply chain behind the fuel that is procured from third party suppliers. The risks in the sector have been reported to be linked particularly in relation to fuel shipping where seafarers may be exposed to extensive working hours and at times, harsh or unacceptable working conditions. There have also been reports of modern slavery risks at the exploration and extraction stages where there is often a high demand for low-skilled labour in higher-risk geographies.

The Reporting Entities plan to assess the primary suppliers that fall within these categories. That assessment is ongoing. The Reporting Entities intend to issue questionnaires to the first-tier suppliers identified as highest risk by industry, as well as a number of other key suppliers, in order to understand their individual risks more clearly.

4 Actions to assess and address the risks

4.1 Chevron's principles and policies

As indirect subsidiaries of Chevron, the Reporting Entities follow principles and policies to prevent modern slavery and human trafficking. Consistent with Chevron's Human Rights Policy, the Reporting Entities commit to respect human rights as set out in the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as adhere to the principles set out in the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and the International Finance Corporation's Performance Standards.

Commitment to respecting human rights wherever Chevron operates is embodied in the following materials, which are followed by the Reporting Entities:

- (1) Business Conduct and Ethics Code (BC&EC);
- (2) Chevron Way;
- (3) Human Rights Policy;
- (4) Corporate Sustainability Report;
- (5) Chevron's Operational Excellence Management System;

- (6) The Business Conduct and Ethics Expectations for Suppliers and Contractors;
- (7) Chevron's Hotline intranet site, or www.chevronhotline.com; and
- (8) Chevron Australia Downstream's Whistleblowing Policy.

4.2 The Chevron Way, Business Conduct and Ethics Code and Human Rights Policy

The Chevron Way guides how Chevron, including the Reporting Entities, conduct business. Chevron earns trust and respect by acting with integrity and operating with the highest ethical standards – Chevron's culture and reputation are built upon these principles. Chevron places the highest priority on the health and safety of its workforce and protection of its assets, communities and the environment.

The Chevron Way is also foundational to Chevron's Business Conduct and Ethics Code, which refers to the Human Rights Policy and outlines commitments to uphold ethical business practices, including in particular respect for labour rights. The Code applies to all employees, directors, officers, contractors and suppliers, including those of the Reporting Entities.

Chevron's Human Rights Policy establishes expectations for managing human rights, including forced labour issues. The policy includes compliance requirements, guidance on training, processes and procedures, and tools. The policy applies to the Reporting Entities' employees, projects, and operations.

4.3 Supplier engagement

The transition from Puma Energy to Chevron has meant that Reporting Entities' procurement and supplier engagement processes have become more robust and stringent.

The Reporting Entities require their suppliers and contractors to adhere to all domestic laws and expects them to adhere to the International Labour Organization's (ILO) core principles. These principles include the freedom of association, the right to collective bargaining, the elimination of forced and compulsory labour, the abolition of child labour, and the elimination of discrimination in the workplace.

These expectations are communicated through a variety of channels, including supplier agreements and Chevron's Business Conduct and Ethics Expectations for Suppliers and Contractors. The Reporting Entities expect their suppliers and contractors to treat their employees, and to interact with communities, in ways that respect human rights and adhere to the spirit and intent of Chevron's Human Rights Policy.

The Reporting Entities have in place a supplier prequalification process that requires suppliers to attest to their ability to meet Chevron's requirements in relation to a number of areas. Elements of this process include Health, Environment & Safety, Finance, Compliance, IP and employment conditions. All first tier suppliers need to be approved via this process before they can commence direct supply to the Reporting Entities.

4.4 Managing operational risk

As described above in section 3.1, the Reporting Entities do not have complete visibility and control over the CORO employees and their employment terms, however, we engage with those retailers to promote awareness of their obligations under employment laws and the implications of non-conformance. We also have an audit program in place to assess whether the CORO retailers are complying with their obligations under employment laws.

4.5 Managing supply chain risk

The Reporting Entities follow Chevron's Operational Excellence Management System which includes the Contractor Operational Excellence Management (COEM) process. Through its COEM process, the Reporting Entities work with suppliers to increase accountability and continually improve their performance. Major suppliers are selected for periodic audits based on a risk ranking determined by the nature of the work to be performed and the supplier's processes and performance. The audits cover health, environmental and safety standards and compliance. Particular labour issues or concerns may be emphasised as part of this process, depending on the business location and industry.

The Reporting Entities intend to incorporate questions relating to modern slavery as part of its supplier prequalification process. There is already a general compliance clause in procurement contracts that require suppliers to comply with all applicable laws related to labour rights and working conditions, including minimum age requirements, worker safety and ensuring no form of involuntary labour is used. The Reporting Entities intend to update these procurement contracts to include modern slavery terms.

4.6 Training and further information

Training is critical to operationalising the Reporting Entities' respect for human rights. Efforts are undertaken to build awareness of the Human Rights Policy amongst directors, officers and employees.

Human rights training is provided to the individuals and functions most likely to encounter issues related to human rights. The Reporting Entities' human rights training is provided via computer-based training that targets key functions and includes compulsory training in relation to the Chevron Way, which incorporates protection of human rights.

The Reporting Entities intend to provide targeted modern slavery training to personnel operating in Australia in the functions of operations, supply chain, supply and trading, human resources, legal and compliance, which were not achieved during the Reporting Period as a result of the acquisition transition period and the COVID-19 pandemic.

Employees, suppliers, contractors and external stakeholders may communicate any concerns to Chevron's Corporate Compliance Hotline (available 24 hours a day, seven days a week). The Chevron Hotline provides a direct, effective and risk-free way to report suspected violations of the Chevron Business Conduct and Ethics Code, company policies, and applicable laws or regulations. Modern slavery is reportable under the Hotline. The Hotline is also available for use internally and by external stakeholders and is accessible in multiple languages.

5 Assessing the effectiveness of actions

During this initial reporting year, the Reporting Entities have focused their efforts on understanding supply chain risk.

During the course of 2021, the Reporting Entities intend to further enhance their capabilities and processes to address modern slavery risk and, in tandem, develop means to assess the effectiveness of those actions, including by:

- (1) issuing modern slavery questionnaires to first tier suppliers identified as highest risk by industry, as well as a number of other key suppliers, and seeking to achieve more than a 50% completion rate in order to understand their individual risks more clearly;
- (2) providing targeted modern slavery training to personnel operating in Australia in the functions of operations, supply chain, supply and trading, human resources, legal and compliance; and
- (3) incorporating questions relating to modern slavery as part of the supplier prequalification process and updating template procurement contracts to include modern slavery terms.

6 Process of consultation

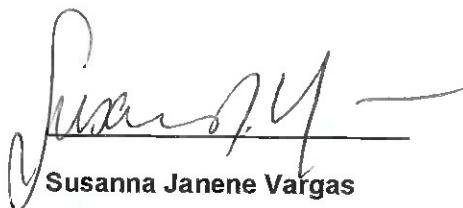
All of the Reporting Entities operate under a common set of policies and procedures and are managed by the same General Manager and Executive Leadership Team in Australia.

The Reporting Entities also share a number of common directors.

In addition to this common leadership, consultation on the contents of this Modern Slavery Statement also involved engagement with all of the Reporting Entities and their owned or controlled entities by virtue of senior managers who have Australian group-wide responsibility, including for each of the Reporting Entities and their owned or controlled entities.

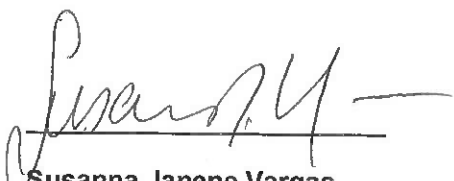
7 Approval

This statement was approved by the board of directors of each of the Reporting Entities on 28 June 2021.



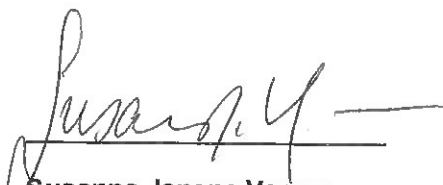
Susanna Janene Vargas

Director, Chevron Australia Downstream Holdings Pty Ltd



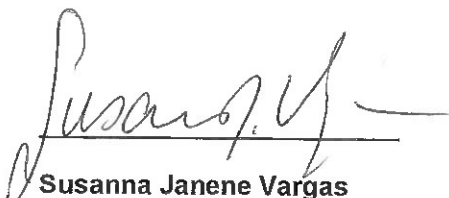
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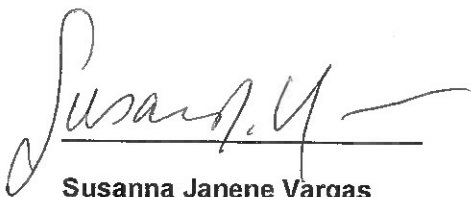
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