

Bennetts Petroleum Supplies Pty Ltd

Modern Slavery Statement

Under the Modern Slavery Act 2018 (Cth)

This statement was approved on 14th April 2025 by Terence Bennett as the Sole Director of Bennetts Petroleum Supplies Pty Ltd.

Terence Bennett
Sole Director

Signature

A handwritten signature in black ink, appearing to read "T Bennett", written over a horizontal line.

Preamble

This Modern Slavery Statement covers the activities of Bennetts Petroleum Supplies Pty Ltd, ABN: 71 009 508 285 (“BPS”) for the period of 1st January 2024 to 31st December 2024.

This 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 BPS 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.

BPS is a reporting entity under the Modern Slavery Act 2018 (cth) “the Act”.
It has no subsidiaries or other entities under its control.

BPS is a fuel distribution company, exclusive distributor of Ampol (formerly Caltex) fuels in Southern Tasmania. The company is both a wholesale distributor of fuel supplies and operates its own chain of retail fuel sites that also offer food and beverages through the Mood Food brand.

About

Industry

BPS 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. In 2025, there are approximately 10,300 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 refer to:

- 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

BPS is a proprietary limited company, locally owned and operated for over 45 years with a head office located at Selfs Point, New Town, Tasmania. Operating 13 retail sites across Tasmania, it also services many wholesale and commercial fuel customers as well as dealer sites and employs approximately 270 Tasmanians.

Supply Chain

BPS is at the end of most of the supply chains it participates in and has a policy and operational approach to engage with Tasmanian based entities in the first instance wherever practical to support Tasmanian and Australian owned, and Australian made.

BPS 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 Telecommunications
<u>Secondary</u>	Fuel Systems Maintenance Services Fuel Transport Vehicle Maintenance Service Uniforms Software Promotional Coordination Service Promotional Materials Office Consumables
<u>Tertiary</u>	Subscriptions Legal Services Taxation and Accounting Services Business And Financial Services Waste Management Services

BPS imports a negligible amount of items from outside of Australia, though it is noted that some of its Australian suppliers may import several items directly from manufacturers overseas, the vast majority of suppliers are Australian suppliers.

Further to this, more than 78% of BPS's suppliers are based in the State of Tasmania.

Many of those suppliers, like BPS, are family owned and operated operations, where contact and communication with key decision makers and staff is done face to face, including the opportunity to observe operations and processes.

Risks Of Modern Slavery Practices In Operations And Supply Chains

Internal Operations

BPS has undertaken to assess the risks of modern slavery in internal operations, and they are considered below. In addition, there is a commitment to and compliance with Australian employment and safety laws, which reduces the risk of modern slavery impacts.

Commission Agent Arrangements

BPS partners with a small number of 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 BPS. These separate businesses engage, pay and manage their own staff.

Supply chains

BPS is an Australian entity that sources its products and services from almost exclusively Australian entities and suppliers, reducing the risk of modern slavery practices being present. In 2025, Australia's Global Slavery Index is at 1.6 victims of modern slavery for every thousand people, one of the lowest in the world.

Assessing and Addressing Risk

During this reporting period, BPS has committed to further educating its leadership and key decision-makers on modern slavery, while continuing to assess associated risks both presently and into the future. BPS remains focused on strengthening and evolving its framework for identifying and addressing modern slavery risks.

Actions taken as of April 2025

- Developed and implemented the *BPS Modern Slavery Policy*.
- Sourced updated modern slavery policies from BPS suppliers and contractors including *Ampol, Asahi Beverages, TasFresh, PDF Foods, Bega Group, TasCaffe and Manning Electrical*.
- Revised the *BPS Whistleblower Policy* to strengthen reporting mechanisms and ensure accessible channels for disclosing modern slavery risks.
- Provided training to BPS's newly appointed Whistleblower Protection Officers on the appropriate handling and processing of modern slavery-related complaints.

Future Commitments

BPS are committed to continuous improvement by strengthening the effectiveness of our modern slavery approach for both internal operations and supply chain.

BPS intends to:

- **Internal Operations:**
 - Include the *BPS Modern Slavery Policy* in the induction process for new employees.
 - Request all current employees review and sign the *BPS Modern Slavery Policy*.
 - Expand internal communications with a focus on the indicators and risks of modern slavery to all employees, via the internal *Employment Hero* HR platform and face-to-face meetings (Operational, Retail and Strategic meetings).
 - Enhance awareness of existing internal confidential reporting mechanisms to employees under the *BPS Whistleblower Policy*, emphasising their availability for reporting modern slavery concerns. *BPS's Whistleblower Policy* establishes a framework for BPS to comply with obligations regarding whistleblowers and is designed to protect and encourage our employees, and those external to BPS with close knowledge of our operations (including employees of suppliers), to report misconduct, including behaviour that is unethical, corrupt or illegal, without fear of retaliation.
 - Continue with safety compliance auditing.
 - Continue executive review of risks in operations.
- **Supply Chain**
 - Expand the risk assessment to include supplier requirements to identify product origin and product origin risk factors.
 - Continue to require modern slavery considerations in major supply contracts.
 - Continue to review the modern slavery statements of major suppliers and contractors.

- Continue to engage with the industry association to address any specifically identified areas of concern in the broader supply chain.

Any claims or instances of modern slavery will be addressed in confidence and in concert with advice from the industry association and government. BPS recognises that we are not equipped to handle instances on our own.

Assessing Effectiveness

BPS is committed to reviewing the approach to modern slavery and all associated processes, policies and communications. The addition of modern slavery to periodic meetings of management and employees, in addition to the specific modern slavery statement preparation process ensures ongoing review of systems and effectiveness.

BPS assesses the effectiveness of the actions we take in several ways:

- **Complaint Mechanisms and Reporting:** Monitoring and reporting on the number of complaints received and resolved to identify trends and issues raised.
- **Training:** The proportion of employees trained in modern slavery.
- **Engagement:** The engagement with suppliers on modern slavery will allow for the assessment of the effectiveness of the approach.
- **Contract Clauses and Tender Questions:** Monitor contract clauses and tender questions so that they continue to include relevant modern slavery clauses.
- **External Engagement:** Actively engaging with industry forums, peers and experts to stay informed on best practices and emerging developments related to modern slavery.

As our modern slavery response program continues to evolve, we will seek to enhance our methods for measuring its effectiveness.

Conclusion

BPS acknowledge that modern slavery remains a present and complex global issue, requiring a collaborative approach. Addressing it effectively necessitates strong partnerships with our suppliers, customers, governments, and the broader community. Achieving meaningful and sustainable change requires addressing the underlying drivers of modern slavery (such as poverty, lack of equal education opportunities and access to fair work opportunities) through collaborative efforts between the public and private sectors.

This statement reflects the actions taken by BPS during the reporting period ending 31st December 2024 and outlines our continued commitment to safeguarding human rights and preventing modern slavery in all its forms.