

IOR Group: Report on Modern Slavery



This Modern Slavery Report is made pursuant to the *Australian Modern Slavery Act 2018* by SMRM Holdings Pty Ltd and its subsidiaries (collectively the IOR Group) and related bodies corporate.

The IOR Group respects ethical labour practices and is committed to eliminating the risk of modern slavery occurring within its own businesses, its supply chains or through any business relationships and/or partnerships.

The IOR Group complies with all local, state and federal legislations and regulations and conducts their business activities in alignment with its values of honesty, integrity and respect for people. Accordingly, the IOR Group seeks to work with suppliers, contractors and customers who are economically, environmentally, and socially responsible.

The IOR Group does not tolerate the existence of slavery, servitude, compulsory labour, trafficking and related acts of exploitation against any human.

1. Reporting entity

The reporting entity is SMRM Holdings Pty Ltd and its subsidiary companies, including offshore activities.

Details of the group entities are set out in Annexure 1 of this document.

2. Structure, operations and supply chains of the reporting entity

The IOR Group is involved in the following businesses:

- a. Refining: Crude oil refining of domestic Australian crude oil in Western Queensland;
- b. Fuel distribution: Distribution of fuels throughout mainland Australia. All fuel distributed is purchased onshore from major fuel companies;
- c. Fuel transport: onshore transport of fuel for own needs and for third party customers;
- d. Fuel management solutions: Proprietary fuel management software and fuel tanks supplied to customers; and
- e. Shared Services: Our shared services are predominantly based at our head office in Cannon Hill, Brisbane, we have 14 offshore staff residing in the Philippines and one offshore staff in Poland

Staff employed by the group are all adults and paid above the minimum wage. The group has the Employment Code of Practice to ensure a respectful and lawful workplace.

3. Risk of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls

The risk of modern slavery practices with the IOR Group is assessed as low, as the Group seeks to do business with Suppliers and other third-parties that have similar values, ethics and sustainable business practices, especially in

relation to human rights and modern slavery.

We understand that the social risk will vary depending on our customers and suppliers, their industry, location, and company size. Major supplies are sourced as follows:

- Refining: all crude oil is supplied by on-shore Australian suppliers and other procurement is relatively low value and supplied by well-established Australian suppliers;
- Fuel distribution: fuel is supplied by well-respected fuel majors, from on-shore Australian terminals;
- Fuel transport:
 - Trucks sourced onshore from internationally recognized brands; and
 - Tyres sourced locally from internationally recognized brands;
- Fuel management solutions: The proprietary fuel management software system was developed and is maintained in-house by our IT team. Tanks are sourced from Australian manufactures and from a Chinese tank manufacturer. In this regard, Directors and Senior Managers have visited the manufacturing plant in China and were satisfied that no slavery was apparent or evidenced;
- Shared Services: We currently have staff members in our Compliance and Finance teams residing in the Philippines. These members are employed at above average market wages and conditions by a third-party employer which is Australian owned and managed

We have one other IT consultant engaged directly in the Philippines via the Upwork platform.

We also engage with various software and hardware developers as consultants for our proprietary technology platforms who are based in Eastern Europe. These are highly skilled technical staff who are directly engaged on market related rates; and

- Other procurement and the associated risks are set out below:
 - Safety equipment and uniforms: reputable Australian suppliers; and
 - Stationery and office supplies: reputable Australian suppliers.

4. Actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks

We ensure that our suppliers are reputable Australian or international suppliers with high ethical standards.

Where we elected to import tanks, a Director and Senior Managers visited the factory prior to purchasing to ensure required quality standards would be met and that ethical business practices were being adhered to.

- Modern Slavery clauses are included in our major

procurement contracts and we review procurement contracts and mechanisms for any indication of unethical procurement with the aim of strengthening legal measures to ensure our partners warrant their conformity to Modern Slavery Legislation. We reserve the right to terminate any contractual agreement or partnership if there is a breach of our Modern Slavery Statement.

We have access to the employment contracts of our Philippines based staff with full visibility of their wages and employment conditions. We conduct regular videoconferencing with our staff in the Philippines and Poland

5. How the reporting entity assesses the effectiveness of such actions;

The effectiveness of these actions is assessed by means of:

- Awareness of Modern Slavery obligations and sensitivity to any reports of issues in this regard with any of our suppliers;
- Conducting risk-based assessments to determine which areas of the business and supply chain are most at risk from modern slavery and ensure appropriate measures are in place to eliminate the risk; and
- Enquiries to major suppliers on a regular basis.

6. Process of consultation with any entities the reporting entity owns or controls or is issuing a joint modern slavery statement with

The IOR Group Board of Directors have ultimate responsibility for governance and oversight of modern slavery risks and all reporting entities are controlled and operated through a single management team.

This joint statement was approved for and on behalf of SMRM Holdings Pty Ltd (SMRM), and each of the IOR Group entities listed in Annexure 1, on 21 December 2021 by the Board of Directors of SMRM.

Annexure 1: IOR Group Entities

	Company	ABN
1	SMRM Holdings Pty Ltd	85 168 760 861
2	IOR Petroleum Pty Ltd	36 009 653 070
3	IOR Aviation Pty Ltd	60 056 487 453
4	AF Townsville Pty Ltd	54 638 510 059
5	IOR Energy Pty Ltd	60 010 504 444
6	IOR Terminals Pty Ltd	14 057 379 067
7	IOR Transport Pty Ltd	66 162 200 099
8	IOR Transport Services Pty Ltd	15 605 338 396
9	Fuelcharge Pty Ltd	32 616 990 339
10	IOR Services Pty Ltd	46 151 774 159
11	IOR Sales & Rentals Pty Ltd	49 137 156 097
12	Henty Aviation Pty Ltd	34 238 922 481
13	IOR Rural Holdings Pty Ltd	33 641 448 277
14	IOR Rural Assets Pty Ltd	83 641 450 473
15	IOR Rural Pty Ltd	76 641 451 630
16	IOR Rural Services Pty Ltd	11 641 449 809
17	Outback Truckstops Pty Ltd	25 065 395 244



Stewart Morland
Managing Director



Ross Mackenzie
Executive Director