



AA HOLDINGS

AA Holdings Pty Ltd

ACN 112 233 744
ABN 94 112 233 744

1st Floor, 40 Johnston Street
Collingwood Victoria 3066

1. AA HOLDINGS PTY LTD MODERN SLAVERY STATEMENT

Date: 30 December 2021

This Modern Slavery statement covers the activities of AA Holdings Pty Ltd (ABN 94 112 233 744) for the period of 1 July 2020 to 30th June 2021 and is published in compliance with our obligations pursuant to the *Modern Slavery Act 2018 (Cth)*.

This statement 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.

Although it is recognized that AA Holdings Pty Ltd 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 these matters, leads to greater awareness and action and thus potentially better outcomes.

About AA Holdings

AA Holdings Pty Ltd (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 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 retail stores.

AA Holdings is a responsible community member and is mindful of the opinions of its neighbourhoods. We construct and operate facilities which observe applicable environmental standards and regulatory requirements.

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



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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%20Australian%20downstream%20petroleum%20industry%202002%20to%202018.pdf>

Structure

AA Holdings is an Australian organization and is a family owned business which is led by its management team who oversee the day to day operations of the company. The structure of the reporting entity remains unchanged since our previous Modern Slavery Report. The AA Holdings head office is located at 40 Johnston 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 49 employees.

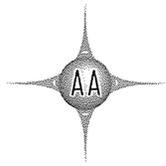
Operations

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
- 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.



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Supplier 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.

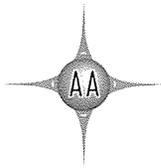
Our supply chain relationships consist of a broad range of industry segments and includes suppliers from the following sectors:

- 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.

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.

Risks of Modern Slavery Practices in the operations and supply chains of AA Holdings

AA Holdings has undertaken to assess the risks of modern slavery in internal operations and they are considered low and remain unchanged from the previous reporting period. AA Holdings maintains its commitment to, and the compliance with, Australian Employment and safety laws which reduces the risk of modern slavery impacts. AA Holdings continues to actively participate in annual independent reviews of employment and safety compliance audits which are undertaken by the industry association ACAPMA.



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The AA Holdings service station network is operated under commission agent arrangement. The commission agent is a separate business receiving fuel commissions for selling fuel on behalf of AA Holdings. These separate businesses engage, pay and manage their own staff. While they are a separate business it is recognized that they pose a risk of modern slavery connected to AA Holdings and as such special arrangements and requirements, including the requirement to provide evidence of annual independent audit of employment and safety compliance, is undertaken.

As part of the first modern slavery statement in the March 2021 reporting period AA Holdings had undertaken to educate itself and its decision makers about modern slavery, and to consider the development of a plan for assessing risk now and into the future.

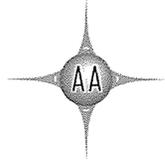
During the second reporting period AA Holdings has:

- Built on its learnings from the first reporting period;
- Considered how to improve communications to management, supply chains and staff regarding identifying possible risks;
- Ongoing review of internal operations and supply chains to assist with developing plans and a due diligence framework for the ongoing assessment, reporting, response and review of modern slavery risks;
- Ongoing review of policies and procedures to maintain modern slavery considerations;
- Ensure modern slavery considerations have been maintained/reviewed upon renewal of major supply contracts and identification of any potential risk areas with new suppliers where AA Holdings could be exposed to human rights concerns.

As part of AA Holdings ongoing commitment to increase the effectiveness of its modern slavery approach for both internal operations and supply chain it will:

Internal Operations:

- Ensure ongoing internal communications to all staff and business leaders as to the risks of modern slavery
- Continuation of annual external employment and safety compliance auditing of both the company and its network of commission agents
- Continue to review and update its policies relating to modern slavery risk.



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Supply Chain:

- Ongoing review of modern slavery considerations within major supply contracts;
- Reviewing the Modern Slavery Statements of major suppliers once published on the register
- Continued engagement with the industry association to address any identified areas of concern specific to the broader supply chain within the downstream petroleum industry.

AA Holdings acknowledges that any claims or instances of modern slavery will be addressed with confidentiality, and with the assistance from the industry association and government. AA Holdings recognizes that it is not equipped to handle instances regarding Modern Slavery on its own.

As this is only the second statement it is recognized that the emphasis during these initial reporting years will be on framework development and the commitment to a program of continuous improvement in assessment and identification of modern slavery risk.

AA Holdings has consulted on the content and form of this statement with all associated entities and it was approved by the sole director on 30th December 2021 prior to publication.

This Statement was approved on the 30th December 2021.

Andreas Andrianopoulos
Sole Director
AA Holdings Pty Ltd