

## MODERN SLAVERY STATEMENT

### GULF WESTERN PREMIUM QUALITY LUBRICATING OILS (AUSTRALIA) PTY LTD

#### 1. Introduction

Gulf Western Premium Quality Lubricating Oils (Australia) Pty Ltd (Gulf Western) is pleased to present its Modern Slavery Statement (MSS).

This MSS is made pursuant to the Australian Modern Slavery Act 2018 (Cth) (MS Act) and relates to the reporting period from 1 January 2024 to 31 December 2024.

The MSS addresses the mandatory criteria contained in section 16 of the MS Act. Gulf Western opposes all forms of modern slavery and this statement outlines its commitment to identifying and addressing modern slavery risks within its operations and supply chain.

#### Mandatory Reporting Criteria under the MS Act

The mandatory criteria for modern slavery statements, as set out in section 16(1)(a) to (g) of the MS Act, are addressed as follows:

#### 2. Description of Gulf Western

Gulf Western Premium Quality Lubricating Oils (Australia) Pty Ltd is a New South Wales-based company specializing in the manufacture, distribution, trading, and importing / exporting premium quality lubricating oils and related products. As of 31 December 2024, Gulf Western employed 130 employees. This MSS pertains to Gulf Western Premium Quality Lubricating Oils (Australia) Pty Ltd, with the following details:

#### TABLE OF REPORTING ENTITIES

Gulf Western Premium Quality Lubricating Oils (Australian) Pty Ltd	ABN 79087558398
Gulf Western Premium Quality Lubricating Oils (Manufacturing) Pty Ltd	ABN 15003816920
Gulf Western Premium Quality Lubricating Oils (Queensland) Pty Ltd	ABN 71162965237
Gulf Western Premium Quality Lubricating Oils (Victoria) Pty Ltd	ABN 63169231798
Gulf Western Workshop Division Pty Ltd	ABN 39607710994

#### 3. Structure of Gulf Western, its Operations, and Supply Chain

Gulf Western is administered from its head office / warehouse located in St Marys, New South Wales. The company operates a warehouses in NSW, Queensland, Victoria and South Australia.

Gulf Western's operations include:

- Supplying customers with various lubricating oils, including engine oils, hydraulic oils, gear oils, and specialty lubricants;
- Providing toll blending services;
- Exporting lubricating oils to international markets.

Gulf Western's supply chain involves the procurement of base oils and additives. The company buys base oils that are imported from reputable refineries in Singapore and South Korea, as well as sourcing products including additives from various countries including USA, Singapore and China).

Gulf Western supplies customers across industries such as automotive, commercial, industrial, agriculture, mining, transport, and manufacturing. While the majority of its customers are in Australia, Gulf Western also serves clients in New Zealand, Papua New Guinea, China, Samoa, Fiji, New Caledonia, Tahiti and Singapore.

#### 4. Modern Slavery Risks in Gulf Western's Operations and Supply Chain

Gulf Western acknowledges that modern slavery encompasses exploitative practices such as human trafficking, debt bondage, slavery, servitude, forced labour, and child labour, where coercion, threats, or deception are used to exploit individuals.

##### Gulf Western's Operations

Gulf Western employs 130 direct employees in Australia, all covered by individual employment contracts that comply with the Fair Work Act 2009 (Cth) and relevant Fair Work instruments. A small number of employees are covered by applicable Modern Awards. During recruitment, Gulf Western verifies employees' right to work in Australia.

The company engages various subcontractors for ancillary services, primarily transportation of oils and chemicals.

To ensure a safe and ethical workplace, Gulf Western implements the following measures:

- Compliance with the Fair Work Act 2009 (Cth) and the Work Health and Safety Act 2011 (NSW);
- Employment of a quality and compliance officer to monitor and enforce workplace health and safety standards;
- Maintaining accreditations, including:
  - ISO 9001:2015 Quality Management Systems;
- Implementation of an Environmental Management Plan.
- Implementation of an accredited Environmental Social Governance plan.

##### Gulf Western's Supply Chain

Gulf Western recognizes potential modern slavery risks within its supply chain, particularly in industries like mining, which may have higher risks. However, the company mitigates these risks by sourcing primarily from Singapore and South Korea, where modern slavery prevalence is low, and from a reputable Australian supplier.

To further reduce risks, Gulf Western employs:

- A rigorous supplier approval process with mandatory checklists to ensure suppliers meet legal and ethical standards;
- A designated quality and compliance officer to oversee supplier compliance;
- Full and accurate record-keeping of supplier transactions;
- Regular internal audits to maintain ISO accreditations.

#### 5. Gulf Western's Actions to Assess and Address Modern Slavery Risks

Gulf Western has implemented systems to minimize and, where possible, eliminate modern slavery risks, including:

- Engaging all employees with formalized written contracts or letters of offer;
- Ensuring compliance with Fair Work instruments for minimum statutory entitlements and pay;
- Reviewing labour practices to ensure:
  - Employees have the legal right to work;
  - The workplace is safe and non-discriminatory;
  - Employees are paid in accordance with minimum standards;
- Complying with applicable laws, including work health and safety regulations;
- Implementing policies such as:
  - Drug and Alcohol Policy;
  - Occupational Health and Safety Management Systems;
  - Environmental Management Systems;
  - Quality Management Systems.

Gulf Western will continue to assess new suppliers for modern slavery risks.

## 6. Gulf Western's Assessment of Risks in its Operations and Supply Chain

During the reporting period, Gulf Western focused on understanding modern slavery risks within its supply chain and operations. The company is committed to minimizing these risks by:

- Developing a modern slavery policy;
- Creating additional labour-related policies;
- Engaging with suppliers to address any identified modern slavery risks;
- Enhancing human resources functions by engaging external consultants.

Gulf Western will continue to evaluate and strengthen its measures to ensure compliance with the MS Act.

## 7. Process of Consulting with Entities Owned or Controlled by Gulf Western

As Gulf Western Premium Quality Lubricating Oils (Australia) Pty Ltd is a standalone entity with no subsidiaries for the purposes of this MSS, no additional consultation with owned or controlled entities was required.

### Conclusion

The contents of this MSS have been approved by the Board of Gulf Western Premium Quality Lubricating Oils (Australia) Pty Ltd on 29 December 2024, in its capacity as the principal governing body within the meaning of section 13 of the MS Act. The MSS has been signed by John Smith, the Managing Director of Gulf Western, on 29 December 2024.



**Ben Vicary**

Managing Director

Gulf Western Premium Quality Lubricating Oils (Australia) Pty Ltd