JOINT MODERN SLAVERY STATEMENT

Reporting period: 1 July 2019 to 30 June 2020

Bintan Pty Ltd (ABN 18 095 076 421)
Covering Park Pty Ltd (ABN 17 093 014 129)

1. About this statement

This joint statement is made by Bintan Pty Ltd (Bintan) for itself and the entity it controls, Park Pty Ltd (Park) referred to as the Park Group. It describes the steps taken during the reporting period to assess and address the risks of modern slavery in the Group's operations and supply chains. It has been prepared in accordance with section 14 and the mandatory criteria in section 16 of the Modern Slavery Act 2018 (Cth) (Act).

Modern slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. The Group recognises that modern slavery risk is a risk to people and that the absence of a reported incident does not, by itself, demonstrate that no risk exists.

2. Our commitment and approach

The Park Group does not tolerate modern slavery in its operations or supply chains. We seek to manage the risk through practical controls proportionate to our size, influence and operating model. Our approach prioritises higher-risk categories and suppliers, engagement and improvement, and the safety and interests of any affected person.

- apply lawful and fair employment practices within the Group;
- identify modern slavery risk using country, sector, product, workforce and business-model indicators;
- consider modern slavery risk when selecting, onboarding and reviewing material suppliers and contractors;
- communicate expectations through our Modern Slavery Policy and proportionate contractual or procurement requirements;
- provide channels for concerns to be raised without retaliation; and
- review the effectiveness of our response and improve it over time.

3. Structure, operations and supply chains

3.1. Structure

Bintan is the reporting entity and parent company. Park conducts the Group's principal fuel importing, storage, wholesale, retail and distribution activities. The entities share governance, financial, people, procurement, operational and safety systems and are managed through common executive oversight.

3.2. Operations

Business area	Activities relevant to this statement
Terminals	Receipt, storage and dispatch of fuel and related products at Australian terminal and depot facilities; terminal maintenance and contracted services.
Wholesale	Import and domestic procurement of refined fuel; bulk sales and distribution to commercial, industrial and reseller customers.
Retail	Operation and supply of fuel retail sites, including procurement of retail goods and services.
Corporate and support	Finance, procurement, people, information technology, property, professional services and other functions supporting the operating businesses.

The Group's direct workforce is located in Australia and includes operational, driving, retail, maintenance, commercial and corporate personnel. Contractors are used where specialist skills, flexible capacity or third-party services are required.

3.3. Supply chains

The Group's most significant supply chain is refined petroleum sourced from Australian and overseas suppliers and delivered by marine and road transport. Other supply chains include:

- terminal, depot and retail construction, maintenance and shutdown services;
- road transport, marine freight, warehousing and logistics services;
- fuel-handling equipment, vehicles, parts, tyres, uniforms and personal protective equipment;
- cleaning, security, waste, facilities and labour services;
- retail merchandise, packaging and consumables;
- information technology, telecommunications and electronic equipment; and
- professional, property, financial and other corporate services.

Fuel and some manufactured products have multi-tiered global supply chains. The Group generally has greater visibility and leverage over direct suppliers than over upstream refiners, producers, manufacturers, vessel operators and labour providers.

4. Modern slavery risks

4.1. How we understand risk

Our assessment distinguishes between the risk that the Group may cause or contribute to modern slavery and the risk that its products, services or operations may be directly linked to modern slavery through a business relationship. The principal exposure is assessed to be direct linkage through extended supply chains. Risk is considered by reference to geography, sector, product or service, workforce vulnerability, supplier visibility, use of subcontracting and the Group's leverage.

4.2. Priority risk areas

Risk area	Why the risk may arise	Potentially exposed activities
Imported fuel and marine logistics	Complex, international and opaque upstream chains; seafarer vulnerability; recruitment fees, document retention, isolation and jurisdictional differences.	Imported refined fuel, chartering or freight interfaces, ports and vessel services.
Contracted and subcontracted labour	Low-skilled, migrant, temporary or labour-hire workers may face underpayment, coercion, excessive hours or recruitment debt; subcontracting can reduce visibility.	Cleaning, security, maintenance, construction, shutdowns, transport and labour hire.
Road transport and logistics	Commercial pressure, small subcontractors, long hours and dispersed work may increase vulnerability or mask poor employment practices.	Fuel haulage, site deliveries, warehousing and third-party logistics.
Manufactured goods	Raw material extraction and multi-tier manufacturing can involve forced or child labour in higher-risk locations.	PPE, uniforms, electronics, batteries, solar or electrical items, vehicles, parts and retail goods.
Retail and facilities services	Low margins, outsourcing and vulnerable workforces may elevate labour exploitation risk.	Cleaning, security, waste, merchandising and facilities maintenance.
Own workforce	Risk is lower due to direct employment in Australia, but may arise through migrant-worker vulnerability, recruitment practices or inadequate reporting access.	All Group operations and corporate functions.

This assessment identifies inherent risk indicators; it is not a finding that modern slavery has occurred in a particular supplier or category.

5. Actions to assess and address risk

5.1. Governance and policies

The policy framework relevant to modern slavery includes the Modern Slavery Policy and Group controls for employment, work health and safety, contractor management, procurement, complaints, incident reporting and legal compliance. The Modern Slavery Policy applies to Group personnel and communicates expectations to contractors, consultants, business partners and suppliers.

5.2. Own workforce controls

During the reporting period, the Group continued to manage employment through Australian employment and workplace systems. Relevant controls included:

- direct employment and written terms and conditions for Group employees;
- payment, time and attendance, superannuation and employment-record controls;
- right-to-work checks and lawful treatment of workers with visa conditions;
- work health and safety consultation, incident reporting and grievance pathways; and
- prohibition of unlawful discrimination, coercion and retaliation.

5.3. Supplier and contractor due diligence

The Group applies due diligence proportionate to the nature, value and risk of the relationship. Depending on the risk and available leverage, this may include reviewing the supplier's location and service model, ownership and reputation; checking licences, insurances and employment or contractor arrangements; considering a supplier's modern slavery statement or policies; asking targeted questions; and including appropriate compliance, information, notification or termination rights in contractual documents.

Supplier engagement is preferred where concerns can be safely and effectively addressed. The Group does not treat a contractual clause or a supplier's published statement as conclusive evidence that risk is being managed. More detailed enquiries may be undertaken where risk indicators, allegations or material changes arise.

5.4. Risk escalation and purchasing decisions

Personnel responsible for a supplier or contract are expected to escalate credible indicators or concerns to their manager and the Chief Financial Officer. The response is determined case by case, taking account of the potential harm to people, urgency, credibility, the Group's connection to the impact, leverage and the risk that abrupt disengagement could worsen the position of affected workers.

- seek clarification or further evidence from the supplier;
- require and monitor a corrective action plan;
- increase oversight, restrict new work or pause an engagement;
- obtain specialist, legal or law-enforcement advice where appropriate; or
- end the relationship where the risk cannot be responsibly managed.

5.5. Awareness and reporting

The Group uses policy communication, onboarding or role-based briefings to support awareness among personnel whose roles involve people, procurement, contract management or operations. Concerns may be raised through a manager, People and Culture, HSSE, the Chief Financial Officer or established incident and grievance channels. Reports are to be handled sensitively and without retaliation.

6. Remediation

The Group's first priority in responding to a suspected case is the safety and interests of the affected person. Personnel must not confront a suspected offender, conduct an unsafe investigation or take action that may expose a person to retaliation. The Group will assess the concern, preserve confidentiality and relevant information, and seek specialist assistance as appropriate.

Where the Group has caused or contributed to harm, it will seek to provide for or cooperate in appropriate remediation. Where it is directly linked through a supplier, it will use available leverage to encourage or support remediation. Actions may include repayment of unlawfully charged recruitment fees or withheld wages, return of identity documents, safe accommodation or work arrangements, access to support, and prevention of recurrence. Termination will not be used automatically where it may increase harm.

Immediate danger or a suspected criminal offence should be referred to emergency services or the Australian Federal Police as appropriate. Any external referral must consider consent, confidentiality, safety and specialist advice.

7. Assessing effectiveness

Effectiveness is assessed through a practical annual review of whether controls are operating and whether identified issues are acted on. The Group does not rely on the absence of complaints as its only measure.

Measure	Evidence considered	Review approach
Governance	Statement approval, policy review and allocated actions.	Annual reporting review and management follow-up.
Risk assessment	Material suppliers or categories screened and changes in priority risks.	Review coverage and whether higher-risk areas received proportionate attention.
Due diligence	Supplier enquiries, documents reviewed, escalations and corrective actions.	Check completion and quality on a sample or exception basis.
Awareness	Briefing or training completion for relevant roles and questions raised.	Review reach, relevance and recurring knowledge gaps.
Grievance and response	Concerns, response times, outcomes and lessons, with privacy protected.	Assess whether channels were accessible and responses were timely and person-centred.
Improvement	Actions closed, overdue items and recurring findings.	Management review and prioritisation for the next reporting period.

The maturity of the program will be evaluated by trend and quality rather than by setting unsupported zero-tolerance performance targets. Findings will inform the next risk assessment and annual action plan.

8. Consultation across the Group

This statement was prepared through consultation between Bintan and Park. Because the entities operate under common executive oversight and shared systems, consultation occurred through the functions that manage Group-wide finance, people, procurement, operations and HSSE matters. Relevant leaders reviewed the description of their activities, risks, controls and proposed priorities. The statement was then provided to the Bintan Board for consideration and approval.

9. Approval and signature

This joint Modern Slavery Statement was approved by the Director of Bintan Pty Ltd, as the principal of the entity giving the statement, on 23rd September 2026.



Brett Fletcher
Director and responsible member of Bintan Pty Ltd
Date: 23rd September 2026

This statement reports the Group's actions under the Commonwealth Act. It is not a representation that the Group's supply chains are free from modern slavery, nor does the Act require such certification.