

Petro National Pty Ltd
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Petro National Modern Slavery Statement

Introduction

This Modern Slavery Statement is made in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth). It outlines the actions taken by Petro National Pty Ltd to identify, manage, and mitigate modern slavery risks within our operations and supply chains. This statement covers the reporting period from July 1, 2023 to June 30, 2024.

Our Commitment

At Petro National, we are committed to acting ethically & with integrity treating each other, our customers, business partners & other stakeholders fairly with integrity & respect.

We recognise the serious issues posed by modern slavery, including forced labour, human trafficking, and other forms of exploitation.

We are dedicated to preventing these practices within our operations and our supply chains.

Our Structure, Operations, and Supply Chains

Structure

Entity. Petro National Pty Ltd is an Australian company based in Sydney.

Ownership: is a 100% subsidiary of ENEOS Holdings, INC., which has its head office in Japan. Further information on the Eneos business can be found at www.hd.eneos.co.jp/english

Operations

Petro National Pty Ltd is a single entity. It does not own or control any other entities. Petro National has three business units, each serving different regions and customer bases. These business units are:

- Petro National. A national business to business fuel wholesaler / distributor with sales throughout Australia, predominantly in New South Wales and Victoria.
- Oilsplus. A regional fuel retailer and distributor located and servicing the Central West area of NSW, operating 4 x Shell branded retail sites and a rural distributorship with high proportion of agricultural customers.
- South West Fuel. A regional fuel retailer and distributor located and servicing the Riverina area of NSW, operating 3 x Independent (SWF), 3 x Ampol branded retail sites and a rural distributorship with high proportion of agricultural customers.

Employees: ~140. Most of our people are employed in the regional fuel distribution and retail service station business units. All our people are employed locally.

Sales Volume: ~380ML

Revenue: ~\$600M. Most of the purchases to support this revenue is for fuel.

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Supply Chains

Following is an overview of Petro National's major supply chains

Fuel Supply & Delivery (Petro National, Oilplus and South West Fuel)

Diagram 1 provides an overview of the Fuel Supply Chain for Petro National bulk fuel sales & the Oilplus & South West Fuel regional network fuel distribution and retail service station sites.

Diagram 1. Petro National, South West Fuel and Oilplus Fuel Supply Chain



- **Fuel Purchases.** Most of our purchases are for fuel (diesel / petrol). All fuel is purchased locally from the two remaining Australian refineries (Ampol Lytton and Viva Geelong) and major fuel importers. The importers are all either Australian owned (e.g., Ampol and Viva Energy) or the Australian based entities of significant international corporations such as Chevron (Caltex), BP and Glencore.
- **Fuel Transport.** Petro National operate our own fleet. We also purchase transport services from Australian owned and operated transport companies such as Ron Finemore Transport.

Other Supply Chains (Retail Services Station / Regional Depots / Petro National) excluding fuel

- **Retail Convenience Goods (Oilplus and South West Fuel Retail Service Station Sites).** For our retail sites, Petro National purchases food and convenience goods. These are the typical packaged food, beverages and other convenience goods provided through retail service stations including the stores of major service station networks such as 7 Eleven, Ampol, Viva (Shell) and BP. These purchases are sourced from the same suppliers as the major service station convenience store chain operators using the same or similar supply chains.
- **Fresh Food & Ingredients (Oilplus and South West Fuel Retail Service Station Sites).** Petro National purchase our fresh food and ingredients from local food producers and suppliers. These suppliers are typically small local businesses well known to local management.

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- **Equipment.** Almost all equipment purchases are for our Oilplus and South West Fuel bulk fuel distribution and retail service station sites. This equipment is generally purchased through local / regionally based businesses. These businesses either manufacture / fabricate locally or install / supply imported equipment. In the case of imported equipment most of this equipment is through recognised international brands (e.g., Kenworth for trucks, Ford for utility vehicles, etc.).
- **Other Goods & Services – Petro National Head Office.** Petro National purchases office equipment and supplies through Office Works and contracts out our legal, auditing, communications, payroll & IT services.
- **Other Goods & Services – Oilplus and South West Fuel.** Aside from Petro National head office contracted services such as auditing, legal and payroll, almost all services are provided for and performed through local or regionally based businesses. These businesses are typically small to medium sized businesses locally / regionally owned and operated.

Identifying and Assessing Modern Slavery Risks

We understand that modern slavery can exist in within our business operation and supply chains. Our approach to identifying and assessing these risks includes:

- **Internal Operations Review.** We have engaged a qualified independent advisor to audit our employment systems and processes to ensure robust compliance with all Australian employment law and regulations. All our employees are employed locally and our practices fully comply with all Australian employment law and regulations.
- **Supply Chain Review.** We have reviewed our supply chain to identify potential risks of modern slavery and to assess the likelihood of modern slavery practices within our suppliers:
 - **Fuel.** We have reviewed the publicly available information relating to our major fuel suppliers on their approach to managing modern slavery risk. All these entities are all aware of modern slavery risks and according to their publicly available information and statements have their own processes and procedures in place to reduce the risk of modern slavery within their supply chains.
 - **Retail Convenience Goods.** Petro National purchases packaged food, beverages, and others convenience goods for our retail service station sites. These are the typical goods provided through the convenience stores of major service station networks such as 7 Eleven, Ampol, Viva (Shell) and BP. These purchases are sourced from the same suppliers as the major service station convenience store chain operators using the same or similar supply chains. As a retailer with only 10 services stations sites, Petro National does not have the capacity to independently assess the supply chains of major food, beverage, and convenience good suppliers. Consequently, we rely on regulatory / industry bodies to identify any concerns with modern slavery within the industry. Given our extremely small scale in the retail area, we consider the risk of our actions causing an adverse modern slavery impact to be low.
 - **Fresh Food & Ingredients.** Petro National purchase our fresh food and ingredients from local food producers and suppliers. These suppliers are typically small local businesses well known to local management. We have not had any reason across our small supplier base to suspect that these suppliers are engaging in modern slavery.

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- **Transport Services.** Petro National operate our own fleet. We also purchase transport services from transport companies such as Ron Finemore Transport. All our transport services providers are contractually required by Petro National to operate in strict compliance with all Australian employment rules and regulations. Furthermore, we engage regularly with management of these firms and with their employees at a local level. Through their need to comply with Australian laws and regulations and this engagement we consider the risk of these suppliers engaging in modern slavery to be low.
- **Equipment.** Almost all equipment is purchased through local / regionally based businesses. These businesses either manufacture / fabricate locally or install / supply imported equipment. In the case of imported equipment most of this equipment is through recognised OEM brands (e.g., Kenworth for trucks, Ford for utility vehicles, etc.). These businesses are subject to Australian employment laws and regulations. Furthermore, we engage regularly with management of these firms and with their employees at a local level. Through their need to comply with Australian laws and regulations and this engagement we consider the risk of these suppliers engaging in modern slavery to be low.
- **Other Goods & Services – Petro National.** Petro National purchases office equipment and supplies through Office Works and contracts out our legal, auditing, communications, payroll & IT services. All our contractual arrangements require suppliers to operate in full compliance with the relevant Australian employment law and regulations. These businesses are subject to Australian employment laws and regulations. For contracted services, we engage regularly with management of these firms and with their employees who perform services for Petro National. Through their need to comply with Australian laws and regulations and this engagement we consider the risk of these suppliers engaging in modern slavery to be low.
- **Other Goods & Services – Oilsplus and South West Fuel.** Aside from Petro National head office contracted services such as auditing, legal and payroll, almost all services are provided for and performed through local or regionally based businesses. These businesses are typically small to medium sized businesses locally / regionally owned and operated. All our contractual arrangements require suppliers to operate in full compliance with the relevant Australian employment law and regulations. We generally engage regularly with management of these firms and with their employees who provide goods and services for Oilsplus and South West Fuel. Through their need to comply with Australian laws and regulations and this engagement we consider the risk of these suppliers engaging in modern slavery to be low.

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Actions to Address Modern Slavery Risks

To prevent and mitigate the risks of modern slavery in our operations and supply chains, Petro National has implemented the following measures:

- We are committed to full compliance with all Australian employment and safety laws and regulations. We have engaged a suitably qualified independent employment advisor who has audited our systems and processes to ensure robust compliance. We also actively engage with the major industry association, ACAPMA to keep abreast of regulatory changes and best practice implementation to ensure full compliance.
- Contractual Obligations: Where our major supplier contracts have not included specific provisions relating to compliance with the Modern Slavery Act, as contracts are renewed we will ask our suppliers to include provisions that require suppliers to take measures to ensure that modern slavery is not present in their operations.
- Training and Awareness: We are providing modern slavery awareness training to our managers.

Monitoring and Measuring Effectiveness

Petro National is committed to continuously improving our approach to preventing modern slavery. To ensure the effectiveness of our actions, we annually review:

- Our processes to monitor compliance with our policies and legal obligations.
- Risk assessments, supply arrangements and training

To ensure we are taking appropriate steps to identify and address modern slavery risk within our business and supply chain.

Approval

This Modern Slavery Statement has been approved by principle governing body of Petro National PTY LTD, the Petro National Board of Directors.

Anthony Gilbert
Chief Executive Officer
Petro National Pty Ltd
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