



The United Petroleum Group

Modern Slavery Statement (Modern Slavery Act (Cth) 2018).

Overview and Our Story

Our Directors commenced in the petroleum industry in 1981, operating a group of service stations under the Astron banner. Astron was closely associated with Esso (an Exxon Company), and by 1990 the company had constructed 23 new sites operating under the Esso brand throughout Victoria.

United Petroleum was established in 1993 with the opening of a chain of service stations/convenience stores in South Australia. We expanded operations into Victoria, and over the next two years built networks in New South Wales, ACT and Queensland.

We subsequently acquired and developed sites in Western Australia, Northern Territory and Tasmania and now have a national network of service stations and associated tenancies.

We vertically integrated in the mid 2000's via the acquisition of fuel import terminals in Victoria, New South Wales, Northern Territory and Tasmania. Control of terminal facilities has allowed us to seek high quality petroleum products not only from refineries within our shores, but also via the importation of bulk tanker-loads.

This statement is pursuant to the Modern Slavery Act 2018 (Cth) and sets out our actions taken to address modern slavery risks in our business and supply chain over the financial year end June 2021.

Our Structure, Operations and Supply Chains

The United Petroleum Group of companies is structured as a business separated into a number of operational lines. This encompasses:

- ✓ Management and administration
- ✓ Finance
- ✓ Wholesale
- ✓ Property
- ✓ Facilities Maintenance
- ✓ Pie Face
- ✓ Retail Operations
- ✓ Merchandise
- ✓ Marketing
- ✓ Fuel Cards
- ✓ Construction
- ✓ Corporate services: Legal, HR, HSE & IT
- ✓ Transport
- ✓ Terminals



The risks of modern slavery practices in the operations and supply chains of United Petroleum.

United Petroleum Group acknowledged that the provisions of a safe, secure and healthy working environment for all its employees, contractors and the environment, is not just a moral and legal obligation, but an essential means of achieving the highest possible standards in order to undertake its business efficiently and safely.

Our Health, Safety and Environment Policy is applicable to the United Petroleum Group in all its operations and functions, including those situations where employees and contractors are required to work offsite or remotely.

Describe the actions taken to assess and address those risks, including due diligence and remediation processes.

United Petroleum Group manage the risks of modern slavery through our daily business management and our supply chain through our risk framework. The Audit Committee function is responsible for providing oversight on behalf of the Board.

To ensure that United Petroleum Group minimise the risk of modern slavery and the potential exposure to human rights risk, we use our internal reporting mechanisms and refer to the Global Slavery Index. We also utilise information and resources made available through the following organisations:

- ✓ Global Impact Network ([Global Compact Network Australia | GCNA \(unglobalcompact.org.au\)](http://unglobalcompact.org.au))
- ✓ TRACE International ([TRACE | Raising the Standard of Anti-Bribery Compliance \(traceinternational.org\)](http://traceinternational.org));
- ✓ Transparency International Corruption Perceptions Index (<https://transparency.org.au>) ; and
- ✓ Modern Slavery Registry ([Global Slavery Index](http://GlobalSlaveryIndex.org)).

While United Petroleum Group recognise that modern slavery is an issue globally, we have established reporting procedures where employees and third parties can report any concerns regarding unethical behaviour or conduct within the business including modern slavery and human trafficking. Employees can report any matter to their manager, or if they wish to remain anonymous, all employees and third parties can use our independently operated whistleblower hotline service (Stoplevel Pty Ltd) via telephone, email, online reporting, smart phone APP and by traditional mail.

United Petroleum Group have decided that to minimise the risks of modern slavery our suppliers of goods and services have been categorised as follows:

Major Suppliers – that contribute up to 65% of our supply chain:

- ✓ Reviewed existing company policies and statement of our major suppliers
- ✓ Educating these suppliers as to the existence of the Modern Slavery Act (Cth) and inviting them to make their own statement
- ✓ Inspections: Our ethics and audit committee team attended each site and inspected the premises and met with our suppliers.



Australian suppliers:

- ✓ Reviewed existing company policies and statement of our major suppliers
- ✓ Educating these suppliers as to the existence of the Modern Slavery Act (Cth) and inviting them to make their own statement
- ✓ Inspections: Our ethics and audit committee team attended each site and inspected the premises and met with our suppliers.

International suppliers:

- ✓ Reviewed existing company policies and statement of our major suppliers
- ✓ Educating these suppliers as to the existence of the Modern Slavery Act (Cth) and inviting them to make their own statement
- ✓ Inspections: Our ethics and audit committee team attended each site and inspected the premises and met with our suppliers

Minor suppliers:

- ✓ Reviewed existing company policies and statement of our major suppliers
- ✓ Educating these suppliers as to the existence of the Modern Slavery Act (Cth) and inviting them to make their own statement
- ✓ Inspections: Our ethics and audit committee team attended each site and inspected the premises and met with our suppliers.

Additional Information:

Staff training and awareness:

United Petroleum Group are committed to ensure that all our staff will be trained in these risks during the 2021/22 year.

How we assess the effectiveness of these actions.

To date we (United Petroleum Group) have found no instances of Modern Slavery in our supply chain and neither have we. We will demonstrate the effectiveness of these actions by:

- ✓ All senior management including the audit and risk committee will review and report to United Petroleum Group Board in response to modern slavery across the business and our supply chain;
- ✓ Ensure all new suppliers are vetted to ensure they comply with the Modern Slavery Act through our audit and risk process for onboarding new suppliers.
- ✓ Conduct audit on all suppliers' premises to ensure they comply with the Modern Slavery Act
- ✓ Perform annual reviews of all clients to ensure that comply with the Modern Slavery Act

The process of consultation with entities that United Petroleum own or controls.

United Petroleum Group will work with our suppliers and contractors to ensure they have a robust system of reporting modern slavery and human rights issues within their own network. Our internal Audit Committee together with our management team will invite our suppliers to provide United Petroleum Group with a copy of their compliance reporting. United Petroleum Group will also invite each supplier to voluntarily make a similar statement about the risks and impact on business aligned to the Modern Slavery Act (Cth).

Compliance Statement.

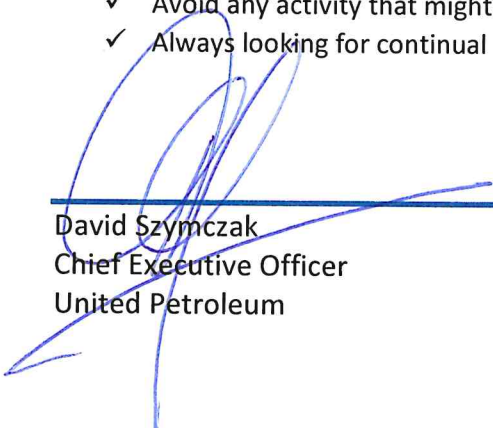
United Petroleum is proud to certify that:

- ✓ policies are in place which prohibit Modern Slavery;
- ✓ to the best of its knowledge and belief, there is no Modern Slavery in its or its Supplier Personnel's supply chains or in any part of their business; and
- ✓ neither it nor the Supplier Personnel:
 - (a) have been convicted of any offence involving Modern Slavery; and
 - (b) to the best of its knowledge, have been or are the subject of any investigation, inquiry, or enforcement proceedings by any Government Agency regarding any offence or alleged offence of, or in connection with Modern Slavery.

Our goals for 2021/2022.

During the next financial year, United Petroleum Group will be continuing to improve and set our goals so that we can achieve our planned outcomes. United Petroleum have set the following goals:

- ✓ Conduct staff training on modern slavery, what the company is doing and their role;
- ✓ Continue to encourage all suppliers to have their own modern slavery statement and policy in place to show their commitment;
- ✓ Avoid any activity that might lead to, or constitute modern slavery; and
- ✓ Always looking for continual improvement and opportunities.



David Szymczak
Chief Executive Officer
United Petroleum

References:

1. Global Impact Network ([Global Compact Network Australia | GCNA \(unglobalcompact.org.au\)](https://unglobalcompact.org.au))
2. TRACE International ([TRACE | Raising the Standard of Anti-Bribery Compliance \(traceinternational.org\)](https://traceinternational.org));
3. Transparency International Corruption Perceptions Index (<https://transparency.org.au>) ; and
4. Modern Slavery Registry ([Global Slavery Index](https://www.modernslaveryregistry.com)).