

MODERN SLAVERY STATEMENT

Vantage Fuels Pty Ltd ACN 151 023 040

Reporting Year: 1 July 2022 - 30 June 2023





INTRODUCTION

As noted in previous modern slavery reports, Vantage Fuels Pty Ltd (we, us, our, Vantage) is a family business operating in the retail sector as an independent fuel retailer. Our business is conducted exclusively in Australia and our operations are all subject to Australia's strict regulatory framework.

Our key products are purchased from large, often multinational, suppliers (all of whom have operations directly in Australia).

The key finding from our first modern slavery statement, submitted pursuant to the Modern Slavery Act 2018 (Cth) (Act) (First Report), was that improved knowledge of our supply chain and increased supplier engagement was required to more thoroughly address and assess the risks of modern slavery in our operations and supply chain. This remains an ongoing focus as we strive to develop systems and processes to enhance our understanding of our supply chain and improve our awareness of the possible risks of modern slavery in our operations and supply chain.

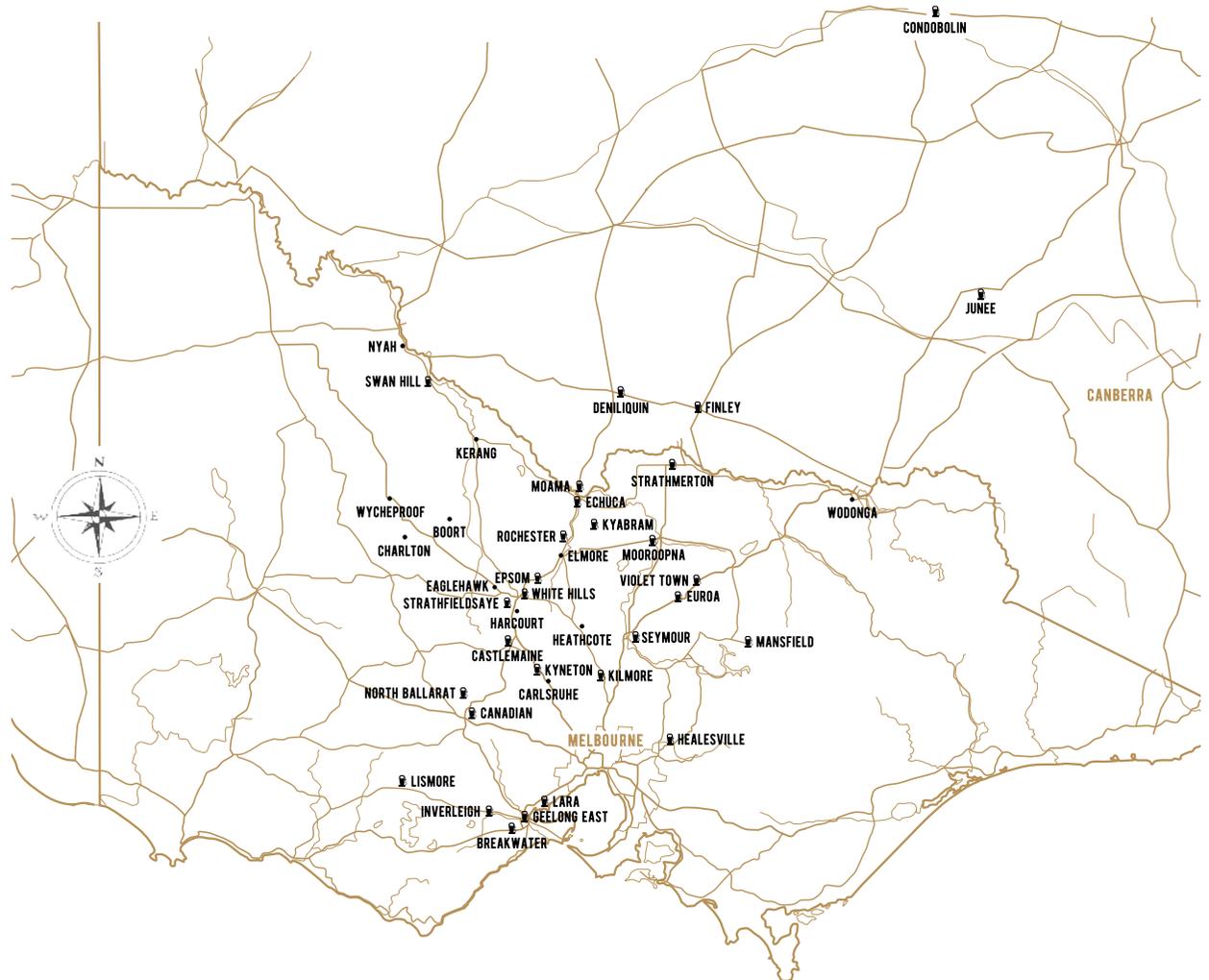
We are pleased to submit our Modern Slavery Statement for the reporting year 1 July 2022 to 30 June 2023 in accordance with the requirements of the Act.



CHAPTER 1 - WHO WE ARE

Vantage Fuels Pty Ltd ACN 151 023 040
(Vantage/ we/ us/ our) is a privately owned proprietary company limited by shares. Vantage was incorporated in Victoria on 20 May 2011. There are two company directors of Vantage.

Throughout 2023, Vantage transitioned its support office operations from Bendigo to Melbourne. At the date of this report, our registered office and principal place of business is located at 578 City Road, South Melbourne, Victoria. We have retained a satellite office in Bendigo.





CHAPTER 2 - OUR STRUCTURE AND OPERATIONS

Our Operations:

Our core business is the operation of service stations including convenience stores and cafes. Our stores are located within regional Victoria and New South Wales.

We are an independent fuel retailer and fuel is supplied to our sites (either directly or indirectly) by two multinational fuel suppliers. Our cafes, trade as either 'Bowser Bean', 'Bowser Bound' or 'Vantage Fuels'.

Key facts and figures:

At the time of publication:

- Vantage's network includes 40 service station sites in regional Victoria and New South Wales;
- 9 sites are operated by commission agents (the commission agents operate the "shop" component of the business and the fuel component of the business is managed by us);

- Bowser Bean Café operates within 21 sites;
- Bowser Bound shop brand and system operates within 3 sites; and
- we are proud to employ approximately 20 staff in our head office and approximately 500 staff in our sites.

Structure:

Vantage is the primary operating entity within a private (family) group of entities. The activities of the group are principally centered around the business operations of Vantage. Vantage does not own or control other entities.



CHAPTER 3 - OUR SUPPLY CHAIN

A general depiction of Vantage's supply chain is illustrated below:





The products and services that are essential to the operation of Vantage's business are depicted in the infographic below:



Supplier analysis

As noted in previous modern slavery reports, our relationships with our key suppliers are generally strong and longstanding.

Our key products and services are all supplied by organisations who have domestic (Australian) operations and who are regulated by Australian law.

It was noted in previous modern slavery reports that, whilst our key suppliers all have domestic operations and our procurement from those suppliers takes place domestically, the raw materials or component parts used in the production and manufacture of some of our products may be sourced internationally.

We remain committed to improving our knowledge of our supply chain to enable us to better understand where these component parts and raw materials are produced and/ or sourced and how this may affect the risks of modern slavery in our operations and supply chain.



CHAPTER 4 - DESCRIPTION OF THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN

The risks of modern slavery practices being present in our operations and supply chain have been noted in previous modern slavery reports. Our modern slavery team have reviewed these risks (which are noted below) and, based on the information currently available, have concluded that our risk profile has not materially changed since the previous reporting year. However, we confirm that we remain committed to improving our awareness of these risks and, where appropriate, developing systems and processes to mitigate them.

Risks that we *cause* modern slavery in our operations

Vantage's modern slavery team have identified the following risks of modern slavery in our operations and supply chain:

Our direct operations

We operate exclusively within Australia and our operations are all subject to Australian law. We foster a strong compliance culture and submit, on an annual basis, to an independent, external audit of our financial statements.

This report indicates that all relevant financial compliance standards are achieved.

Commission agents

Nine of our sites are operated by commission agents. We are not responsible for employing the staff at these sites. To ensure our commission agent sites are compliant with employment laws, our commission agents are required to submit to an annual, independent audit of their employment conditions.

Conclusion

Having regard to our domestic regulatory framework, the downstream position we occupy in our supply chain, the size and nature of our key suppliers and the outcome of our current and previous audits, we remain confident that neither our operations nor our conduct within our supply chain directly causes modern slavery.



Risks that we *contribute* to modern slavery practices in our supply chain

Price is one of the factors we consider when making procurement decisions. While price is not generally the sole determinant of a procurement decision, the fact that it is considered at all may (indirectly) create pressure for our suppliers to source their products or supply their services at a lower price. This, in turn, could create a risk of facilitating or contributing to modern slavery practices further up our supply chain. To mitigate this risk, we have increased our focus on educating those members of our team with procurement decisions about modern slavery and its effects.

Risks that we may be *directly linked* to modern slavery practices in our supply chain

We do not have direct contractual relationships with all participants in our supply chain. In these circumstances, there is an inherent risk that our operations and supply chain could be linked to modern slavery practices through the activities and conduct of other entities in our supply chain. To mitigate this risk, we have increased our focus on ensuring new supply agreements have clauses requiring our suppliers to comply with their internal modern slavery policies and/ or the requirements of the Act.

At this stage, based on supply chain information that is presently available we cannot eliminate the risk that we may be linked to modern slavery via the following causes:

Product risks and industry risks: Some products within our supply chain are manufactured using processes that are known to be associated with risks of modern slavery or within industries where there are known risks of modern slavery. Such products and/ or industries include coffee beans (used in the production of coffee), cacao (used in the production of chocolate), tobacco (used in the production of cigarettes) and the textile industry (used to produce the uniforms worn by our staff and the 'general merchandise' sold in our sites (hats/ beanies etc)).

Geographic risks: Some of the raw products used in the manufacture of products within our supply chain may be sourced from countries where there are established risks of modern slavery. We maintain our focus on improving our supply chain knowledge to enable us to better understand and analyse our supply chain risks.



CHAPTER 5 - DESCRIPTION OF THE ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

The key focus for the modern slavery team for the current reporting year was improving the knowledge of those team members in our organisation who have procurement responsibilities about our modern slavery duties and responsibilities.

As part of this, training was provided that confirms what modern slavery is, the risks created by modern slavery and how we are managing the risks of modern slavery in our operations and supply chain. The purpose of the training was to foster awareness and improve understanding of the risks of modern slavery in our operations and supply chain.

2023 Year Conclusions, Findings and Remediation

We:

- consider that we do not currently have sufficient knowledge of our supply chain to fully identify any possible links to modern slavery in our operations and supply chain;
- remain confident that we do not directly cause modern slavery;

- remain concerned, based on the downstream position we occupy in the supply chain, that we do not have sufficient leverage to meaningfully remediate any modern slavery practices if any such practices are identified in our supply chain;
- remain committed to strengthening our approach to managing the risks of modern slavery in our operations and supply chain;
- remain committed enhancing our understanding of our supply chain and improving supplier engagement in relation to modern slavery;
- Improving internal awareness of the risks of modern slavery in our operations and supply chain.

Resources: Key resources that have been used by our modern slavery team are listed in Annexure 2.



CHAPTER 6 - DESCRIPTION OF HOW WE ASSESS THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

At the end of each reporting year, a review is undertaken by our modern slavery team to consider the effectiveness of the actions taken in the relevant reporting year and to set the priorities for the following reporting year.

Following our assessment of the effectiveness of the actions taken during the 2023 reporting year, the principal mandate for the modern slavery team for the 2024 reporting year remains:

- improving our knowledge of our supply chain;
 - increasing our engagement with our suppliers in relation to the risks of modern slavery in our operations and supply chain; and
 - fostering awareness of our modern slavery obligations and responsibilities among those in our organisation who have procurement responsibilities.
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APPROVAL & SIGNATURE

Vantage Fuels Pty Ltd ACN 151 023 040 (**Reporting Entity**) is governed by its two company directors, Mr Mark Tierney and Mr Haydn Tierney (collectively, Principal Governing Body).

This Statement has been approved by the Reporting Entity's Principal Governing Body on 22 December 2023.

Mr Haydn Tierney who is the Managing Director of the Reporting Entity has been appointed by the Principal Governing Body as the Reporting Entity's 'Responsible Member' (as that term is defined in section 4 of the *Modern Slavery Act 2018* (Cth) (**Responsible Member**).

A handwritten signature in black ink that reads "Haydn Tierney". The signature is written in a cursive style and is positioned above a horizontal line.

HAYDN TIERNEY

28 December 2023

DATE

This Modern Slavery Statement is approved by the Reporting Entity's Principal Governing Body and is signed by **Haydn Tierney**, Managing Director, in his capacity Responsible Member of the Reporting Entity on the date set out above.



ANNEXURE 1 - summary of mandatory criteria from section 16 of the Act for Modern Slavery Statements

MANDATORY CRITERIA	LOCATION IN STATEMENT
Section 16(1)(a) of the Act	Chapter 1
Section 16(1)(b) of the Act	Chapter 2
Section 16(1)(c) of the Act	Chapter 3
Section 16(1)(d) of the Act	Chapter 4
Section 16(1)(e) of the Act	Chapter 5
Section 16(1)(f) of the Act	Not applicable (Vantage does not own or control other entities)
Section 16(1)(g) of the Act	Further information is set out in the introduction & in Annexure 1 & 2

ANNEXURE 2 - key resources

DESCRIPTION OF RESOURCE	HOW USED
Tackling Modern Slavery in Supply Chains A Guide 1.1 – produced by the Walk Free Foundation	Used in the preparation of the modern slavery framework, supply chain mapping and risk assessment
2018 Global Slavery Index	Used to inform our risk assessment, in particular in relation to geographic risks
US Department of Labour List of Goods Produced by Child or Forced Labour (https://resourcecentre.savethechildren.net/node/4495/pdf/4495.pdf)	Used to inform our risk assessment, in particular in relation to product risks