

2022
Modern Slavery Statement
Powering our way of life



Reporting Entities

This is a joint Modern Slavery Statement, made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**), for the financial year ended 31 December 2022, covering the following entities that meet the definition of reporting entities in the Act:

- Ampol Limited (ACN 004201307)
- Ampol Australia Petroleum Pty Ltd (ACN 000032128)
- Ampol Retail Pty Ltd (ACN 000175342)
- Ampol Petroleum Distributors Pty Ltd (ACN 005632860)

This Modern Slavery Statement identifies the steps taken in relation to modern slavery by the reporting entities, and the entities wholly owned or controlled by them (together, for the purposes of this statement, "Ampol Group").

Throughout this statement terms such as Ampol, Ampol Australia, and 'we' have the same meaning as Ampol Group, unless the context requires otherwise.



Contents

Message from the Managing Director and CEO	3
About Ampol	4
Our approach to modern slavery	4
Our structure	5
Our operations	6
Our supply chains	8
Supply chain disruptions	11
Modern slavery risks and practices	12
Risks of modern slavery practices	12
Assessing and addressing modern slavery risk	13
Governance	13
Our policies and expectations	14
Supplier engagement	15
Specific risk mitigation for targeted higher risk areas	18
Grievance mechanisms	20
Training	21
Assessing effectiveness and consultation	22
Other relevant information and approval process	23

Message from the Managing Director and CEO



Our 2022 Modern Slavery Statement is another opportunity for Ampol to acknowledge the importance of human rights and our desire for modern slavery to be abolished across the world.

2022 had its challenges, be it the significant volatility of global energy markets resulting from Russia's invasion of Ukraine, extreme weather events or the ongoing concerns of Covid-19.

Despite this, we stayed focused on working to eradicate modern slavery within our sphere of influence, having made strong progress delivering on our commitments as outlined in our second Modern Slavery Statement, which we issued last year.

There are now close to 50 million people subject to modern slavery globally, 10 million more people than previously reported as per the International Labour Organisation's *2021 Global Estimates of Modern Slavery*. It is vital that large organisations such as Ampol take urgent and significant steps to protect human rights in our operations and supply chains.

Combatting modern slavery remains an imperative for Ampol as Australia's leading transport energy distributor and retailer. We are committed to meeting the expectations of our customers, investors, employees and communities in preventing modern slavery in our areas of influence.

Understanding risks within our business and undertaking the necessary actions to address them continues to help shape our strategy in preventing modern slavery, which now includes our Future Energy business. As Ampol continues to evolve so too do our modern slavery assessments of locations where products are sourced.

2022 was another vital year for Ampol and our goal of stamping out modern slavery. I look forward to Ampol continuing this important work in 2023.

In line with the previous year's goals, thanks to the onus we placed on direct engagement, more than 80% of our supply base, when measured by spend, completed our Supplier Code of Conduct questionnaire. We also exceeded our commitment of 100 desktop verification assessments.

Insights from our approach to mitigating modern slavery risks will see Ampol introduce targeted online training modules in 2023, enabling us to identify, validate and assess high risk products and services that our suppliers have in place, and moreover, allow our modern slavery training to be rolled out to more stakeholders than ever before.

Powering better journeys, today and tomorrow continues to ring true at Ampol. Not only for our customers but for every community in which we operate.

I am pleased to present Ampol's 2022 Modern Slavery Statement.

Matthew Halliday

Managing Director and CEO

Our approach to modern slavery

Our approach to modern slavery is guided by our robust risk management framework and is underpinned by our values.

Ampol's approach to modern slavery is underpinned by the Ampol values and the Ampol Risk Management Framework (ARMF), is based on the United Nations Guiding Principles on Business and Human Rights and is collaborative in nature.

Ampol Risk Management Framework

Ampol's ARMF is an enterprise risk management framework, supported by a governance structure, designed to integrate risk management into the overall culture of the organisation.

Risks identified through the ARMF are assessed on a regular basis by management, and material risks are regularly reported to the Board and its committees. These reports include the status and effectiveness of control measures relating to each material risk.

Further information on Ampol's approach to risk management is outlined in our Corporate Governance Statement, which is available on our website.

Modern slavery risk is recognised by the ARMF as a risk source, and the effectiveness of control measures relating to it are assessed regularly. This statement describes the steps taken by Ampol to assess and address modern slavery risks.

Ampol Group Modern Slavery Risk Assessment and Mitigation Standard

Ampol's modern slavery procurement risk assessment and mitigation standard provides a framework for assessing and addressing modern slavery risks when purchasing goods and services and is routinely used by Ampol employees and contractors to evaluate supply chain risk.

United Nations Guiding Principles on Business and Human Rights

We recognise our responsibility to avoid causing or contributing to modern slavery through our activities. We also recognise our responsibility to mitigate modern slavery risks that are otherwise linked to us, including through our supply chains. This responsibility requires us to have clear policies, due diligence and remediation processes. Recognising we can't tackle all potential modern slavery risks at once, we have prioritised our mitigation activities, considering the severity of the risk and our leverage and ability to influence it. We also recognise the need to continually reassess our modern slavery response program, improve on it and show progress each year.

Collaborative approach

Our preference is to engage, collaborate and work with others to address modern slavery and bring about meaningful change. We recognise that collaborating broadens our reach and will allow us to educate, share knowledge and learn from others, ultimately leading to better management of modern slavery risks both by Ampol and business generally. Modern slavery working groups that have been initiated throughout the business continue to grow, incorporating more business units, ensuring we continue to foster new ideas, gain further insight and allowing a broader perspective when monitoring and reviewing the effectiveness of processes adopted to mitigate modern slavery risks.

Ampol values

The Ampol Values underpin everything we do. In particular, the Ampol Value of *Never stop caring* encourages us to always do the right thing and have a positive impact on the communities and economies in which we operate. Ensuring that no modern slavery exists within our operations and supply chains is a critical action that supports this value.



Connect to win

We collaborate as an integrated business to drive growth.



Find new ways

We innovate to deliver positive outcomes.



Own it

We make bold decisions and are accountable for the outcomes.



Make a difference for customers

We are connected to our customers and solve their changing needs.

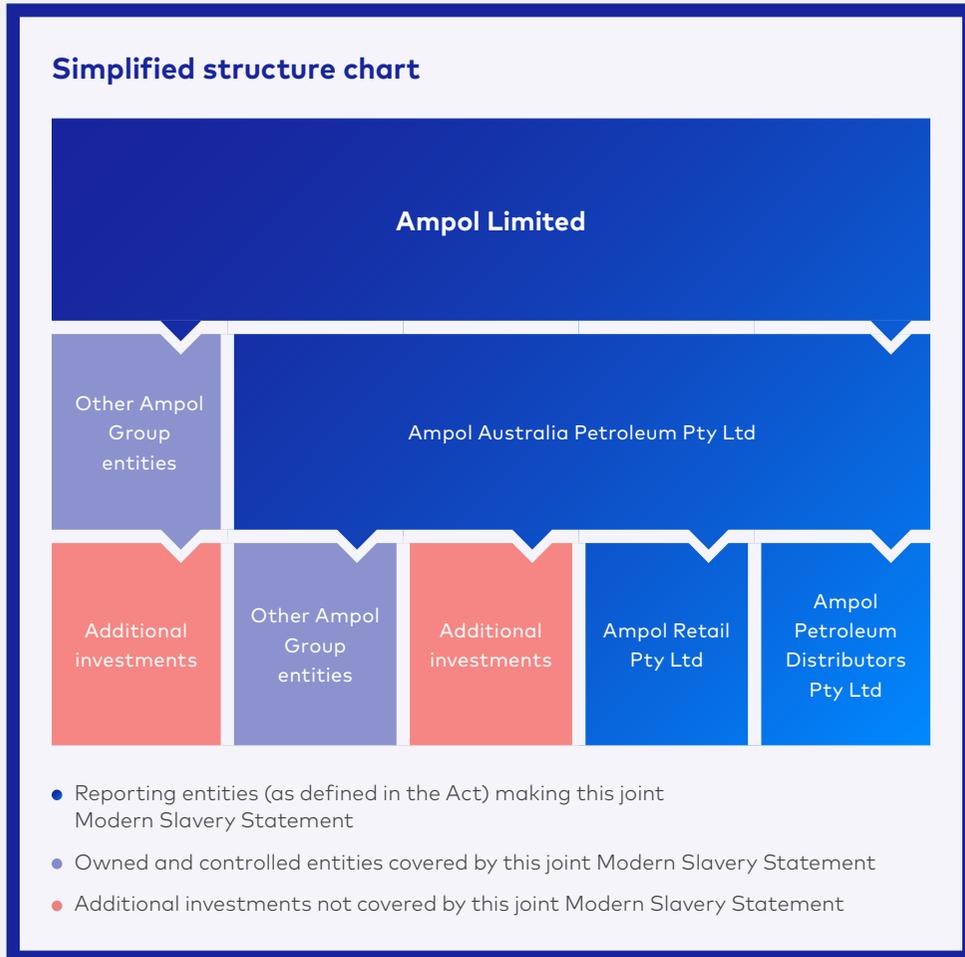


Never stop caring

We keep safety first and make a positive contribution to those around us.

Our structure

Ampol Limited is an independent Australian company and the nation’s leader in transport fuels.



Ampol Limited and the Ampol Group

Ampol Limited is the Australian Securities Exchange (ASX) and New Zealand Exchange (NZX) listed parent company of the Ampol Group, comprising approximately 81 controlled entities. For a full list of controlled entities, see Ampol's 2022 Annual Report (Note F1 to the Financial Statements).

Ampol Limited is incorporated in Australia with its registered office at 29–33 Bourke Road, Alexandria, NSW 2015.

Subsidiary reporting entities

Ampol Australia Petroleum Pty Ltd is a wholly-owned subsidiary of Ampol Limited and the main operating entity for the Ampol Group.

Ampol Retail Pty Ltd is a wholly owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol's Convenience Retail business.

Ampol Petroleum Distributors Pty Ltd is a wholly owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol's national depot network and associated truck fleet.

All three subsidiary reporting entities are incorporated in Australia.

Additional investments

Ampol also holds additional investments in a number of associates and joint ventures as set out in Ampol's 2022 Annual Report (Note F5.1). This statement does not cover actions taken by these associates and joint ventures that Ampol does not control.

Our operations

Powering our way of life

For over 100 years, Ampol has kept our customers moving with the right fuel in the right place. Today, we are leveraging our assets and core business to continue to safely and reliably meet the energy needs of customers in Australia and across our region, while considering new low emissions energy solutions for the future.

We supply Australia's largest branded petrol and convenience network as well as refining, importing and marketing fuels and lubricants. We have a deep history and are listed on the Australian Securities Exchange (ASX) (primary listing) and New Zealand Exchange (NZX) through a foreign exempt listing.

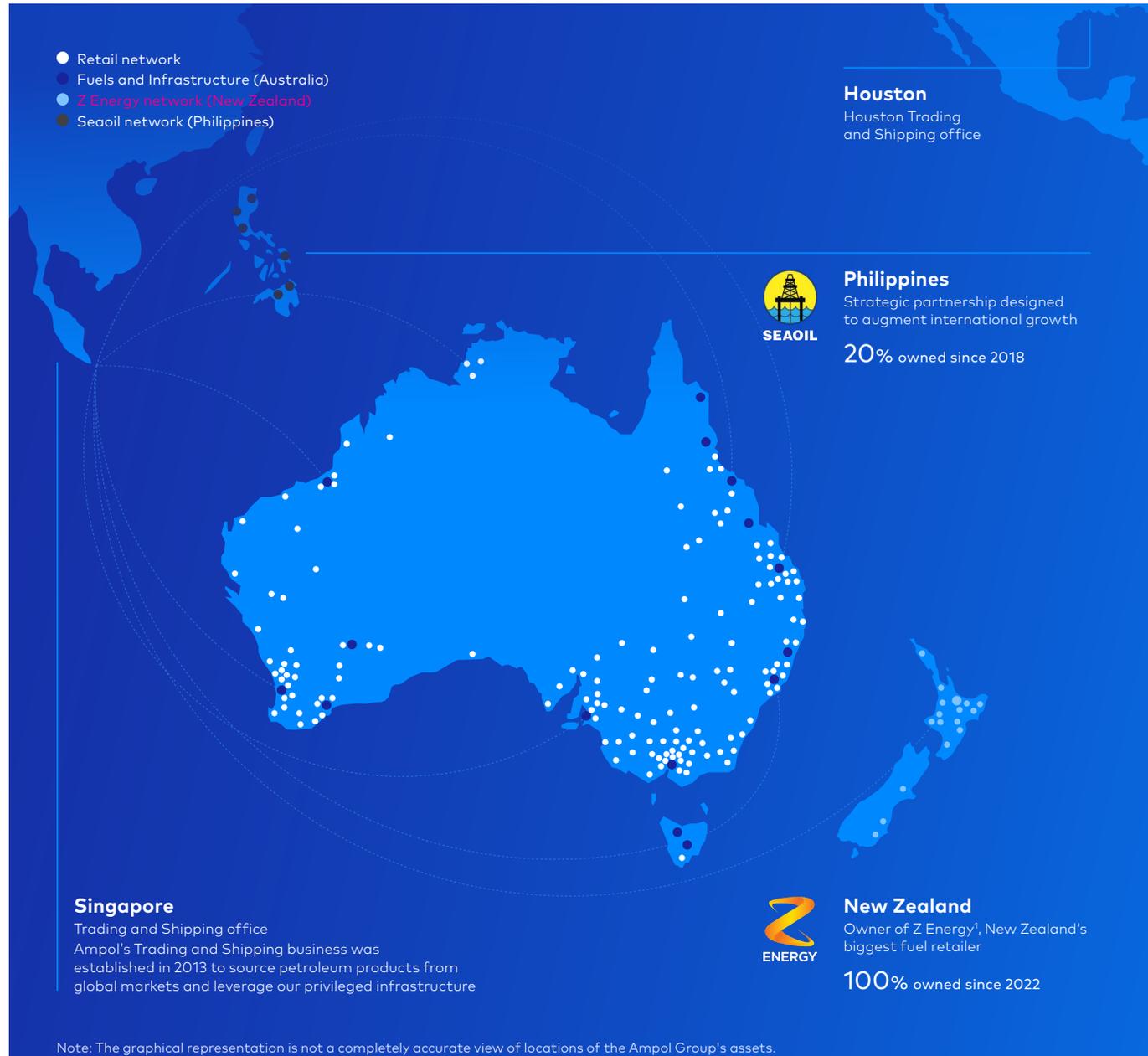
Ampol supplies fuel to approximately 110,000 business and SME customers in diverse sectors across the Australian and New Zealand economies, including defence, mining, transport, marine, agriculture, aviation and other commercial and industrial sectors. Across our Australian and New Zealand retail networks, we serve approximately four million customers every week with fuel and convenience products.

Our ability to service our broad customer base is supported by our robust supply chain and strategic infrastructure positions. In Australia that includes 15 terminals, 6 major pipelines, 53 wet depots, 1,824 Ampol branded sites (including 645 company-controlled retail sites) and one refinery located in Lytton, Queensland. In New Zealand that includes 9 terminals and 526 sites (includes Z Energy and Caltex branded sites). This network is supported by over 9,300 people across Australia, New Zealand, Singapore and the United States of America (USA).

In recent years, we have leveraged our Australian business to extend our supply chain and operations into international markets. This includes our Trading and Shipping business that operates out of Singapore and Houston in the USA, and our international storage positions across the Asia Pacific region. We also have grown our presence in New Zealand through the acquisition of Z Energy. In 2022, our Trading and Shipping business sourced products from 18 countries across the globe.

Ampol divested Gull New Zealand on 27 July 2022 as part of the approval requirements to acquire Z Energy. Ampol also owns a 20% equity interest in Seaoil, a leading independent fuel company in the Philippines.

1. Ampol divested Gull New Zealand on 27 July 2022 as part of the approval to acquire Z energy. On 10 May 2022, Ampol Holdings NZ Limited, a wholly owned subsidiary of Ampol Limited, acquired 100% of the issued capital of Z energy Limited (Z Energy).



Our operations continued

Principal activities



Fuels and Infrastructure

Our Fuels and Infrastructure business sources, imports, refines and distributes fuels and lubricants to a diverse customer base.

-80,000

B2B customers

24.3BL

2022 total sales volume

With capability and scale across the transport energy supply chain, we are leading operators in Australia and New Zealand, and an emerging player in the Asia and United States regions.

Our capability in product sourcing, peerless infrastructure and network assets, coupled with our deep customer relationships, allows us to run an integrated business and to drive value from international sourcing through to wholesale supply of fuels and lubricants.

In 2022, our Fuels and Infrastructure business successfully navigated supply chain disruptions, created by the Russia-Ukraine conflict and adverse weather events across Australia, and delivered exceptional financial and operational performance.

Convenience Retail

Our Convenience Retail business directly operates a network of sites in Australia to deliver fuel, lubricants and a range of convenience and essential products to millions of customers every week.

-3 million

weekly customers at our company-controlled network

645

company-controlled retail sites

1,824

sites in brand and AmpolCard-accepting network, largest in Australia

Through new formats, products, technology and services, we are redefining what convenience means for Australians. Our national network of 645 company-controlled sites delivers customers a premium fuel and card offer through Amplify Premium Fuels and AmpolCard, with a growing convenience offer that is disrupting the Australian market.

In 2022 Convenience Retail completed the Ampol network rebrand, and continued to meet the changing needs of customers and to capture the growing convenience market opportunity.

Future Energy

Our Future Energy business is building new lower emissions solutions for the future to help our customers decarbonise.

5

AmpCharge EV charging solution pilot sites launched

Supporting EV uptake

Key Hyundai, EV Direct, partnerships announced

In 2022, Ampol continued with the execution of our Future Energy and Decarbonisation strategies. Milestones included the launch of our electric vehicle charging solution AmpCharge, and the installation of the first five pilot sites at our retail sites.

Ampol's aim is to build Australia's leading e-mobility brand, leveraging our position as the country's largest branded fuel and retail convenience network. With nearly 3 million customer visits per week in our Australian retail stores and a national network located along major transport infrastructure in metropolitan and regional areas, we are well positioned to achieve this goal. We are committed to meeting the evolving needs of our customers in their energy transition and decarbonisation journeys.

Z Energy

The completion of Ampol's acquisition of Z Energy, New Zealand's leading fuel and convenience business in May 2022, makes Ampol the trans-Tasman leader in transport fuels and will further increase scale in our global supply chain.

-1 million

weekly customers at company-controlled sites

526

company-controlled retail sites

9 terminals

operated by Z Energy

Z is the largest transport energy company in New Zealand, running an unparalleled network of commercial refuelling stations, retail service stations and bulk fuel storage terminals across the country. These nationwide assets give Z the economy of scale across its operations and provide a highly convenient and competitive offer for customers across New Zealand.

Over 2023, Z will progressively shift its contracted fuel import requirements into the Ampol supply function, realising further supply chain efficiencies and economies of scale, and further supporting New Zealand's fuel security.

Z Energy is also expanding its EV charging network to meet the forecast demand of electric vehicles sales in New Zealand over the coming years. Numerous projects and partnerships are underway to ensure emerging technologies are best suited to the needs of our customers.

Our supply chains

Ampol's supply chains include direct products and services for sale to customers, and indirect products and services to support our operations.

Ampol Group supply chains in 2022

2,900

Suppliers¹

94%

Australian suppliers

6%

International suppliers

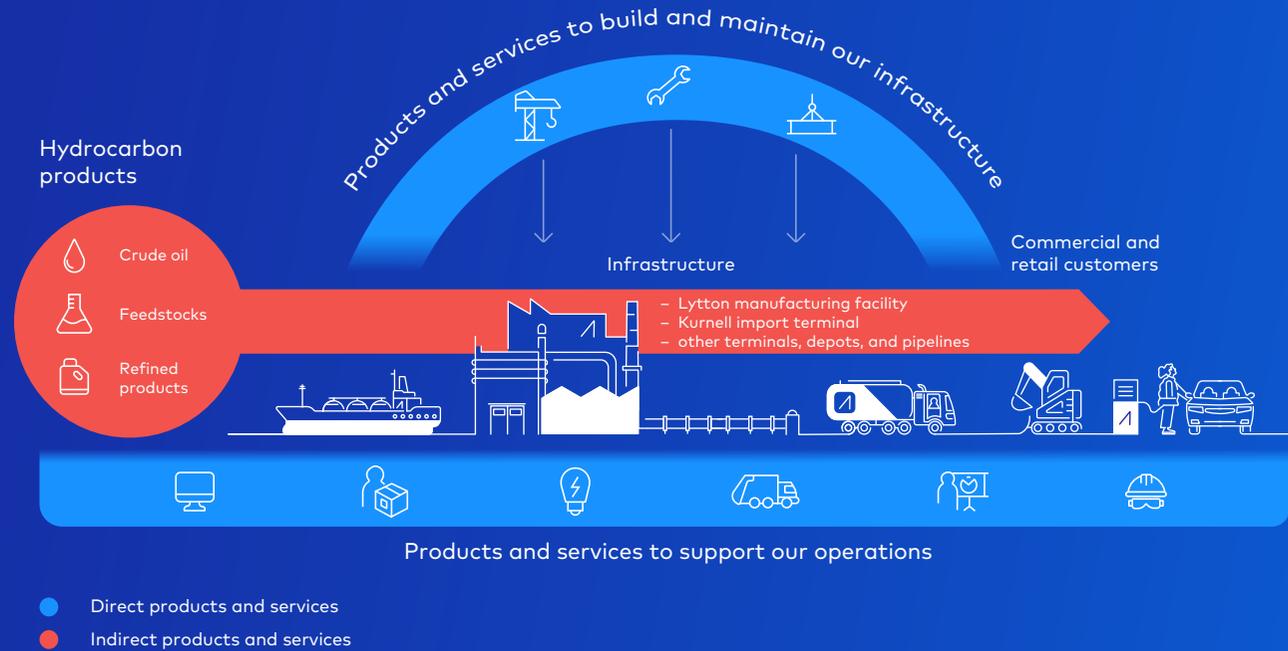
\$13.5b+

AUD spend²

1. Suppliers represent third-party providers that Ampol traded with in 2022 across Fuels and Infrastructure and Convenience Retail supply chains.

2. Approximate third-party spend excluding taxation and government charges and intercompany transactions.

Fuels and Infrastructure supply chain



Ampol's Fuels and Infrastructure goods and services supply chain starts with the sourcing of hydrocarbon products locally and overseas (crude, feedstocks and refined products, including lubricants).

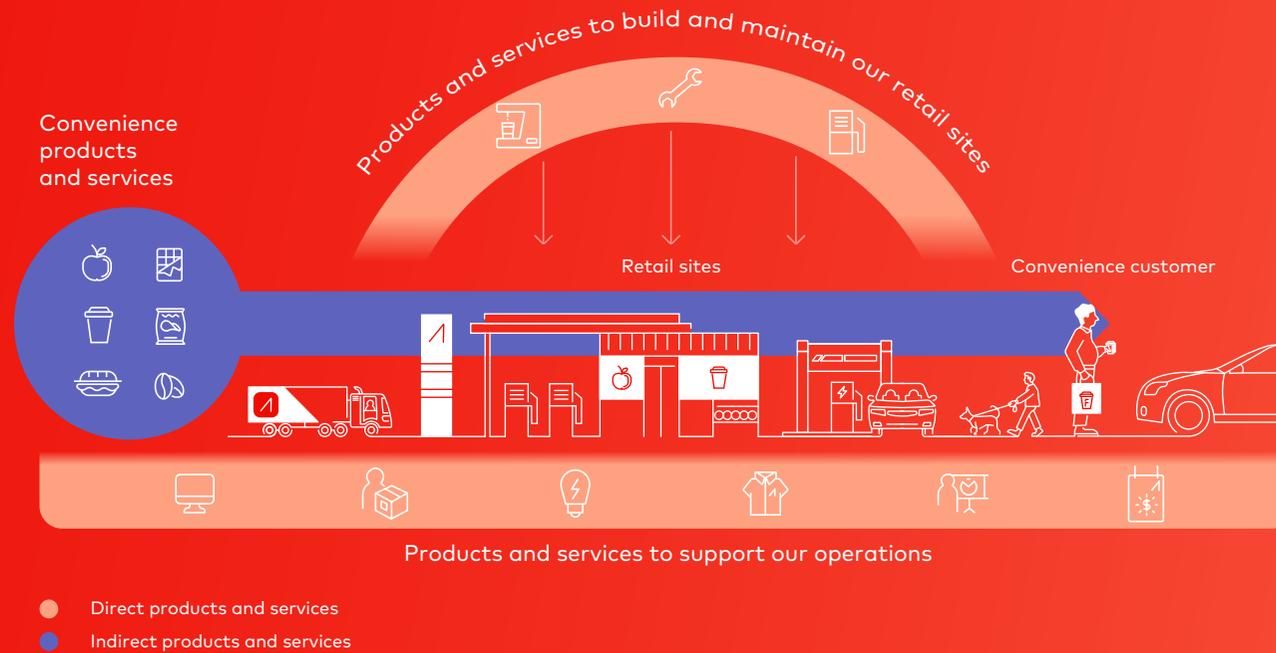
These products are then shipped or distributed:

- directly to Australian and international business customers;
- to the Lytton refinery for processing; or
- to our broad network of assets (including the Kurnell import terminal, other terminals, depots and pipelines) for storage, distribution and sale in our retail business or to our business and commercial customers.

It also includes the procurement of products and services to build and maintain our infrastructure (for example, industrial painting, electrical and mechanical services), and support services and products (for example, logistics, IT infrastructure, PPE, waste management services and professional services).

Our supply chains continued

Convenience Retail supply chain



Ampol's Convenience Retail goods and services supply chain includes the sourcing and distribution of convenience products and services for sale to customers (this includes food ingredients for onsite assembly), the procurement of products and services to build and maintain our retail sites (for example, pump systems, electric vehicle infrastructure and shop fittings) and support services and products (for example, logistics, uniforms, IT infrastructure and marketing).

Our supply chains continued

2022 saw the launch of AmpCharge to support the transition of our customers to EVs.

As an important step forward for our e-mobility strategy, through AmpCharge we are building a national charging network that will assist in minimising range anxiety for EV owners and support EV uptake.

Ampol has an initial commitment to deliver AmpCharge EV fast-charging infrastructure at more than 100 fast-charging sites with over 300 charging bays to be delivered.

The small number of pilot sites deployed in 2022 enabled Ampol to focus on delivering excellent customer satisfaction and to learn from deploying and operating the assets before commencing our scaled rollout program.



Responding to disruptions

In 2022 our business successfully navigated supply chain disruptions.

LOOKBACK

Adapting to market volatility



In 2022, the effects of Covid-19 eased around the world, with little restrictions remaining on international travel. However, energy market volatility increased substantially given geopolitical tensions resulting from Russia's invasion of Ukraine, increasing global prices and creating ongoing uncertainty in markets and supply chains.

Ampol is heavily reliant on shipping and seafarers to move its crude, feedstocks and refined products. The welfare of seafarers remains our priority, and we continue to ensure we monitor any guidance notices issued by the Australian Maritime Safety Authority (AMSA) to ensure seafarer health and wellbeing.

In response to AMSA's guidelines, Ampol remains vigilant and continues to maintain due diligence steps to ensure it is understood how long each crew member has been on board a ship. For any crew member approaching 11 months of continuous service, Ampol will query their repatriation plan.

Ampol will not charter a vessel if it cannot ensure their practices are in line with Ampol's human rights and modern slavery policies. In 2022, Ampol rejected one vessel because a crew member had been on board for 11 months. Ampol worked with the vessel owner, which resulted in the owner performing a disembarkation for all crew members nearing or over 10 months onboard. We took into consideration the owner's positive response to remediation and accepted the same vessel for a subsequent voyage. Ampol will continue to engage with the vessel owner to ensure the welfare of seafarers on that particular vessel.

Ampol charters, on average, 400 vessels per annum and is proud to be championing the cause of fair and safe working conditions for seafarers.

Ensuring safe and reliable supply

Approximately 3 million retail customers per week and approximately 80,000 business customers across Australia depend on Ampol's essential products and services, whether it be fuel, lubricants or convenience products. Ampol's priority is to ensure the health and safety of our employees, customers and partners, and continuing to reliably supply our products and services. In 2023 Ampol will continue to actively monitor and respond to geopolitical and other supply chain disruption events including any elevated modern slavery risks.

Continued focus on due diligence

Ampol continues to make significant progress with its modern slavery program, embedding due diligence procedures into the standard supplier pre-qualification process.

In 2022, this continued focus on our due diligence resulted in our 2022 goal being achieved with over 80% of our supply base, when measured by spend, completing our Supplier Code of Conduct questionnaire, with verification audits performed on over 110 suppliers. Since 2021, all new suppliers have been required to acknowledge the Supplier Code of Conduct and complete the questionnaire prior to onboarding.

To assist Ampol staff and contractors to consider the potential actions and mitigations required to reduce modern slavery prior to procuring goods and services, the Modern Slavery Risk Assessment and Mitigation Standard, introduced in 2021, is a controlled process, embedded in the business, providing a framework for assessing and addressing modern slavery risks when purchasing goods and services.

As part of Ampol's Reasonable Steps Program, validation checks at franchise and associated sites in Australia continued to plan. An internal audit was also carried out in 2022, with one of the primary objectives to assess the effectiveness of the program to respond to any breaches in human rights and modern slavery work obligations. Further detail can be found on Page 18.

Work to improve our contractual updates and to review our modern slavery training has been completed. In 2023 we will review our grievance mechanisms to ensure our incident response procedures are in line with best practices to support victims, and protect them from further harm.

Risks of modern slavery practices

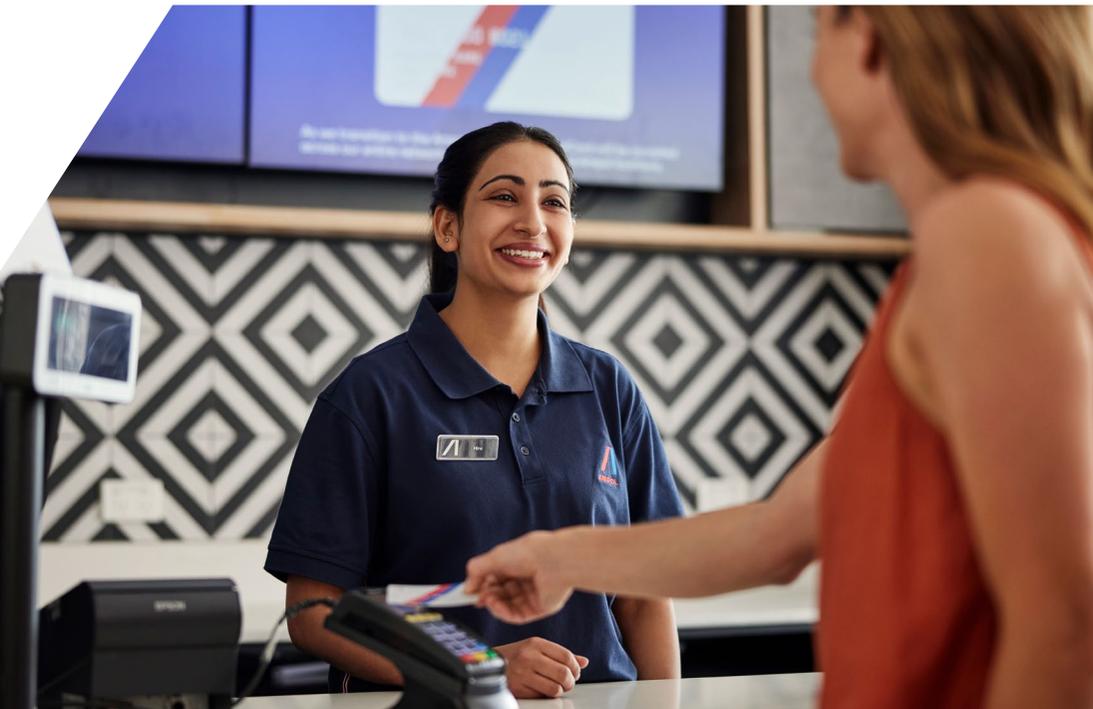
As our business develops new energy solutions, we will be dynamic in our approach to continuing to identify key risk areas within our supply chains and identify areas for prioritisation.

Ampol maintains a detailed modern slavery risk assessment of our operations and supply chains, and this has led to a better understanding and clarity of modern slavery risks within our organisation, highlighting key areas of potential concern.

The assessment utilises established risk indicators and indices (such as the United States Department of Labor's 2018 List of Goods Produced by Child Labor or Forced Labor and the Global Slavery Index 2018) to identify where there are potential modern slavery risks in our operations and supply chains.

Having identified the potential risk areas of concern, Ampol continued to ensure due diligence by way of a series of deep dives and establishing an internal deep dive plan.

Prioritisation of deep dives is determined by business divisions, taking into consideration the nature and severity of the potential risk, and Ampol's ability to influence the risk in those areas. See Page 16–17 (Risk area deep dives) for further detail.



Our risk assessment has identified several potential risks of modern slavery practices in Ampol's operations and supply chain, arising through:



Procurement of high-risk products for resale or to support business operations

Examples include **coffee** purchased for resale at Ampol retail stores; and **electronics** used by Ampol employees



Procurement of high-risk services

For example, **cleaning services** at Ampol sites



Interactions with high-risk industries

Examples include **shipping**, with Ampol regularly chartering vessels to move its crude, feedstocks and refined products; and **agriculture**, with Ampol selling biofuels, which include agriculture feedstock, as well as fruit and vegetables at its retail stores



Reliance on vulnerable workers

For example, **foreign visa holders** in Ampol's non-company controlled retail sites



Use of high-risk business models

Examples include the use of **guard services** procured through third-party labour-hire arrangements at Ampol sites; and the use of base-skilled **construction labourers**, also procured through third-party labour hire arrangements in significant construction projects



Procurement from high-risk countries

For example, the purchase of **uniforms** manufactured in China and Vietnam, which are products classified as 'at risk of modern slavery' in the Global Slavery Index

Assessing and addressing modern slavery risk

We maintain a robust corporate governance structure to mitigate modern slavery risks.



Governance

We believe adopting a high standard of corporate governance is essential to ensuring modern slavery risks are appropriately managed at Ampol. The following governance structure supports the management of modern slavery risks at Ampol.

Ampol Board

Responsible for corporate governance policies and risk management, including those relevant to modern slavery. Approves relevant policies for publication on the Ampol website and Ampol's Modern Slavery Statement.

Board Safety and Sustainability Committee

Oversees the implementation of Ampol's modern slavery response program.

Ampol Executive Leadership Team (ALT)

Monitors progress of the modern slavery response program.

Legal and governance

Works across the business to coordinate and support delivery of Ampol's modern slavery response program.

Further information on Ampol's corporate governance framework, practices and policies is outlined in our Corporate Governance Statement which is available on the [Ampol website](#)

Assessing and addressing modern slavery risk continued

Our policies and expectations

Corporate Governance Statement

Ampol is committed to acting lawfully, ethically and responsibly, which plays a critical role in our success as an organisation and our ability to generate shareholder value.

Ampol values and Code of Conduct

Ampol's approach to modern slavery risks is underpinned by the Ampol values. The Ampol Code of Conduct defines the standards of conduct and behaviour expected from all employees, directors and officers of the Ampol Group. Ampol also expects external parties, including suppliers and customers, to act in accordance with our code. The code sets the foundation which defines Ampol's expectation of its people and includes a firm commitment to supporting the fundamental principles of human rights as expressed in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. The Ampol Code of Conduct confirms Ampol does not tolerate any form of slavery or child labour, including forced labour, and acknowledges that in order to respect human rights, Ampol needs to manage any adverse human rights impacts which we may cause or to which we may contribute or be linked.

The Ampol Code of Conduct applies across the Ampol Group and can be accessed on the [Ampol website](#)

Ampol Supplier Code of Conduct

Our respect for human rights provides the basis for our expectations of ourselves and for our counterparties. These expectations are set out in the Ampol Supplier Code of Conduct (SCoC) and include Ampol's expectations around labour and human rights. This includes the expectations that counterparties will:

- Ensure all work is freely chosen without the use of modern slavery, including forced or compulsory labour;
- Ensure workers are of legal age, preventing any form of child labour;
- Pay their workers lawful wages; and
- Provide fair working conditions for employees.

The principles outlined in Ampol's Supplier Code of Conduct apply to all third-party suppliers, contractors, trading and business partners and service providers (suppliers) and their employees who transact with or provide any goods or services to Ampol.

The Ampol Supplier Code of Conduct can be accessed on the [Ampol website](#)

Ampol Human Rights Policy

Ampol has enshrined its commitment to conducting its business in a manner that respects human rights in its Human Rights Policy. The Ampol Human Rights Policy calls out focus areas where respect for human rights is most critical to the way we operate including:

- Considering human rights and setting minimum expectations as part of sourcing and purchasing decisions; and
- Providing a safe, secure and inclusive work environment free from discrimination, bullying and harassment, together with fair pay and labour conditions.

The Ampol Human Rights Policy applies to the Ampol Group and can be accessed on the [Ampol website](#)

Z Energy

Z Energy Limited's Code of Conduct is a cornerstone of expected behaviour and company culture. It is designed to help guide and inform the choices that staff at Z Energy Limited make on a daily basis and ensure they do the right thing, and to help staff at Z Energy Limited succeed through making choices that are consistent with our values and policies.

Separately, the Supplier Code of Conduct (SCoC) for Z Energy Group is embedded in all of Z's standard supplier agreements. The objective of Z's SCoC is to set clear expectations of all our suppliers regarding ethical, social and environmental business practices. The SCoC provides a framework for meaningful and collaborative partnerships that ultimately work to enhance our communities, increase efficiency and reduce our environmental impact together.

Z Energy is committed to upholding human rights to protect workers and prevent exploitation across our business. Respecting the human rights of our teams and of every worker in our supply chain is an integral element of our strategy. The steps Z has already taken, and those we intend to take, to continue to identify, manage and mitigate the specific risks of modern slavery across our operations and supply chain, can be found in Z Energy's Modern Slavery Statement.

The Z Energy Code of conduct can be accessed on the [Z Energy website](#)

The Z Energy Supplier Code of Conduct can be accessed on the [Z Energy website](#)

Z Energy Modern Slavery Statements can be accessed on the [Z Energy website](#)

Assessing and addressing modern slavery risk continued

Supplier engagement

Ampol Supplier Code of Conduct compliance

The Ampol SCoC sets out the minimum expectations of counterparties across the key areas of labour and human rights, diversity and inclusion, health and safety, environment and sustainability, and ethical procurement. In 2019, Ampol commenced proactive engagement with suppliers to assess their compliance with the expectations set out in the code through a supplier questionnaire administered via Ampol's supplier risk management platform – Informed 365.

The questionnaire allows Ampol to identify gaps in a counterparty's ability to comply with the expectations set out in the code and address these gaps.

This questionnaire has become a mandatory step in our supplier onboarding process and with continued focus in 2022, over 80% of Ampol's existing supply base, by spend, have now completed the questionnaire as per our commitment goal made in 2021. In addition, over 110 desktop verification assessments have been completed.

Some of Ampol's key strategic suppliers that provide goods or services that may be specialised or of a nature that, if supply is disrupted, may cause significant impacts to Ampol, may also demonstrate their own modern slavery compliance through equivalent means. This may include items such as policies, standards, procedures and third party audit certification.

Our expectations are communicated to suppliers through making the code available publicly, the SCoC supplier questionnaire, contractual agreements or when registering for tenders.

FUTURE ACTION

We will continue to ensure that a minimum of 80% of our suppliers, when measured by spend, complete the Supplier Code of Conduct questionnaire. If high risk suppliers are identified we will engage with them specifically on the issue of modern slavery.

Since 2021, all new suppliers must acknowledge the Code during onboarding and complete the supplier questionnaire prior to onboarding.

Contractual clauses and tender questions

To strengthen Ampol's management of modern slavery risks present through counterparty relationships, we have updated all precedents to include requirements around our SCoC and added clauses that specifically relate to modern slavery.

This includes requirements to:

- Comply with modern slavery laws and not engage in modern slavery;
- Maintain relevant policies and procedures;
- Take reasonable steps to reduce the risk of modern slavery in the supply chain; and
- Assist Ampol with its due diligence procedures that are aimed at reducing modern slavery risk in its supply chains.

Since 2020, Ampol has leveraged a sourcing platform that streamlines Ampol's tender process for material tenders. A mandatory question relating to how a supplier manages modern slavery risks has been embedded in the tender platform to ensure that engagement with counterparties on modern slavery risks commences early on.

FUTURE ACTION

We will continue to transition existing suppliers upon renewal of their contracts to updated precedents and clauses.

Since 2021, all new suppliers must acknowledge the Code during onboarding and complete the supplier questionnaire prior to onboarding.



Assessing and addressing modern slavery risk continued

Risk area deep dives

As set out on Page 12 (Risks of modern slavery practices), one outcome of the risk assessment exercise was the identification of several potential modern slavery risk areas which were prioritised for ongoing deep dives.

The deep dives were undertaken using a combination of some or all of the following:

- Detailed discussions with internal subject matter experts;
- Detailed modern slavery questionnaires, administered via Ampol's supplier risk management platform, Informed 365, which was sent to a selection of suppliers;
- Meetings with suppliers to engage specifically on the issue of modern slavery; and
- Implementation of our new Modern Slavery Risk Assessment and Mitigation Standard.

Insights from the deep dives are used to inform our approach to modern slavery risk in these areas and have allowed Ampol to identify additional mitigation steps.

These additional mitigations steps include activities such as targeted training and the use of modern slavery contractual clauses.

FUTURE ACTION

The Modern Slavery Risk Assessment has been embedded into our supplier prequalification process and it will be mandatory for all new suppliers to be assessed on potential modern slavery risks.

Ampol will maintain and improve on the 80% of supplier base by spend and improve on this figure and also commit to performing deep dives on our high-risk suppliers in 2023.

Deep dives undertaken in 2022

12

areas of Ampol's supply chain

The deep dives and detailed modern slavery questionnaires have provided Ampol with better visibility allowing us to identify those higher risk suppliers where additional assistance or monitoring is required. Ampol have worked with these suppliers to engage specifically on the issue of modern slavery, and in some instances initiated third party audits of suppliers' businesses to validate the controls they stated they have in place.



CASE STUDY

Ampol Branded Merchandise

In 2022, a 100% Indigenous Aboriginal and Torres Strait Islander-owned supplier was awarded a contract with Ampol to be the provider of all Ampol branded merchandise. This provides employees with a way to purchase branded merchandise including clothing, stationery, umbrellas, drink bottles and other products.

As part of the tender pre-qualification process, the supplier completed the modern slavery assessment and SCoC questionnaire. The initial findings highlighted that most of the unbranded merchandise that the supplier sourced was high risk and produced in a high-risk location (China), according to the 2018 Global Slavery Index.

Ampol worked with the selected supplier to complete audits on the third-party manufacturers in China. These factories presented audit reports carried out by certified independent agencies and no major issues were discovered.

As part of continued due diligence, the supplier provides manufacturer audit reports to Ampol periodically and annual reports are available upon request to ensure standards are maintained. Both the selected supplier and manufacturing suppliers continue to be transparent and co-operative.

Assessing and addressing modern slavery risk continued



Deep dive – Future Energy

As our Future Energy business commences its journey of building new lower emissions solutions for the future to help our customers decarbonise, we are committed to ensuring we carry out robust modern slavery risk assessments in the process.

These energy solutions will include products, such as electric vehicle chargers and solar panels. Suppliers are onboarded using the same stringent due diligence checks and processes discussed previously. Our initial assessment has highlighted these products are high risk items, sourced from medium and high risk locations.

The Ampol procurement team have undertaken a deep dive which has resulted in mapping out our Future Energy supply chain, and identified those suppliers that score highly on the Global Slavery Index based on goods provided and location.

Ampol has made a commitment in 2023 to undertake deep dives on five out of our current 12 Future Energy suppliers, identified as potential higher risk suppliers. If necessary, we will work with these suppliers to engage specifically on the issue of modern slavery.

FUTURE ACTION

In 2023, deep dives will be undertaken on five Future Energy suppliers that have been identified as having potential modern slavery risks in their supply chain.

Deep dive – Merchandising and Retail review

In 2022, Convenience Retail completed the Ampol network rebrand, continued to execute its growth strategy and remained focused on operational excellence for our customers. New food and merchandise offerings were launched as we progressed the development of new strategic sites.

Our Ampol retail sites offer an array of products and services to our customers, which in turn means we have a diverse supply chain supporting those retail stores. Ampol is committed to carrying out deep dives into all facets of our business and have commenced a detailed modern slavery risk assessment on our merchandising and retail products, to highlight any high-risk products, as well as products sourced from high-risk locations.

These products include products that are currently delivered directly by suppliers or via key distribution partners. Our initial findings indicate we have supply agreements with approximately 100 key suppliers, including products such as food, health and beauty, tobacco, gas and ice. All suppliers have to date agreed to our commercial sales and supplier agreements, which include key standard Ampol modern slavery contract clauses and requirements to read and acknowledge our SCoC.

In 2023 we will work with these suppliers to complete an updated supplier questionnaire, which will allow us to identify high risk products, and services, to engage further and work with these suppliers to validate and assess the controls they have stated they have in place.

FUTURE ACTION

In 2023 we will work with high-risk industry suppliers, to assess whether modern slavery controls they have in place are adequate.

Assessing and addressing modern slavery risk continued

Specific risk mitigation for targeted higher risk areas

Entry-level workers at Australian non-company-controlled sites

While not directly part of our operations, Ampol recognises the potential risk of exploitation of base-skilled workers employed as shop assistants throughout our associated retail sites, which are not company controlled. This workforce includes vulnerable workers, such as foreign students with limited working rights, and migrant workers, who may have limited understanding of their rights or how to enforce them.

Ampol does not have control over the working conditions of employees within the extended network. However, Ampol has a workplace compliance program (Reasonable Steps Program) whereby Ampol takes steps to help ensure fair and legal treatment of workers employed throughout our associated retail sites.

Franchise sites

Within Ampol's franchise network in Australia, the Reasonable Steps Program includes:

- Contractual obligations to comply with workplace laws;
- Workplace compliance audits;
- A phone advice line where franchisees can call and get free advice on first level support for human-resources related matters on a confidential basis; and
- Access to a dedicated hotline for employees wishing to raise wage or visa non-compliance concerns confidentially.

Since the program commenced, approximately 435 sites have been audited, and appropriate remediation action taken where issues were identified.

Since 2018, Ampol has been transitioning franchise sites to company operations, which has resulted in a significant reduction in the risk

of exploitation within this part of the network, with Ampol now controlling working conditions. At the end of 2022, only five franchise sites remained.

All franchised sites as per our commitment were audited in 2022, and we will audit these franchise sites again in 2023.

In 2022 a scheduled internal audit was undertaken to assess the processes to manage and oversee compliance through the Reasonable Steps Program. One of the primary aims of the audit was to assess the effectiveness of the program to respond to any breaches in human rights and modern slavery work obligations. This includes obligations such as providing staff with agreed remuneration and benefits (i.e. to avoid incidents of underpayment or payment discrimination).

During this internal audit the following good practices were observed:

- Engagement of a third-party auditor to support assurance over a large-scale program provides expertise and insights that can drive effective decision-making about compliance.
- A dedicated Business Manager has been embedded within the Ampol team to link and support the relationship between the third-party auditor and Ampol management. Examples include, the facilitation and maintenance of the Validation Check Dashboard and Summary to track the progress of third-party audits against the scope.
- The execution of a substantive audit program for remaining franchised operators provides a level of rigour and investigation in relation to compliance of outgoing franchisees.

FUTURE ACTION

In 2023, all franchised sites remaining in the Australian network will be audited for workplace compliance.

Associated sites (other than franchise sites)

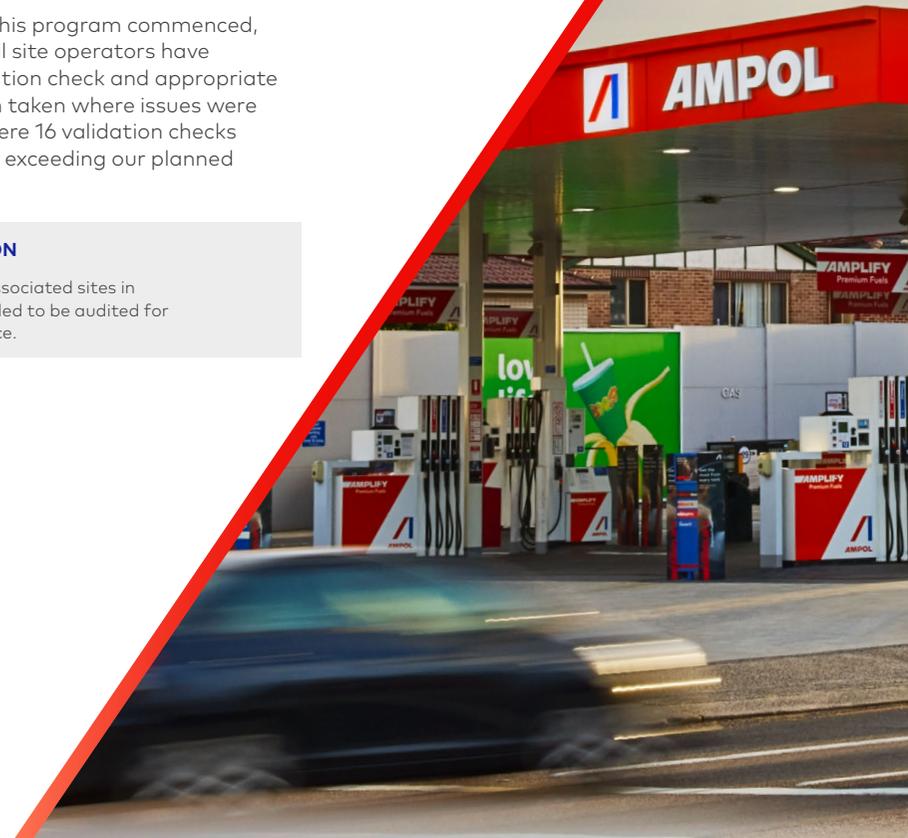
Ampol's Reasonable Steps Program, as it applies to associated retail sites in Australia other than franchise sites, includes:

- Contractual obligations to comply with workplace laws;
- Workplace law compliance validation checks;
- Access to education and practical assistance relating to compliance with workplace obligations; and
- A dedicated hotline for employees wishing to raise wage or visa non-compliance concerns confidentially.

Since 2018, when this program commenced, 56 associated retail site operators have undergone a validation check and appropriate remediation action taken where issues were identified. There were 16 validation checks completed in 2022, exceeding our planned target of 15.

FUTURE ACTION

In 2023, 10% of all associated sites in Australia are scheduled to be audited for workplace compliance.



Assessing and addressing modern slavery risk continued



Seafarer welfare

In recognition of seafarers' particular vulnerability to exploitation, Ampol utilises a vessel-vetting process to ensure counterparties moving our crude, feedstocks and refined products by ship provide fair and safe working conditions for their crew.

We continue to assess the modern slavery risks on vessels chartered by Ampol. In 2022, we rejected one vessel because a crew member had been onboard for more than 11 months. We persisted in our engagement with the owner. Following our discussion, the owner performed a disembarkation for all crew members nearing or over 10 months onboard. We took into consideration the owner's positive response to remediation and accepted the same vessel for a subsequent voyage.

World Check

Using World Check, a third-party due diligence screening tool, all vessel owners are screened for instances of adverse media or litigation (including those relating to modern slavery) prior to onboarding, and on a continuous basis after being approved.

OCIMF inspection reports

All vessels are checked for a current Oil Companies International Marine Forum (OCIMF) vessel inspection report, which focuses on safe operations and safety measures, including where these relate to the crew.

MLC certification

All vessels are checked for a current Maritime Labour Convention certificate, covering issues set out in the Maritime Labour Convention 2006, including protection at work, living conditions, employment, health, social security and related issues.

PSC inspections

Port State Control (PSC) reports (which check compliance with the Maritime Labour Convention 2006) from the previous 12 months are reviewed for all vessels to identify issues and avoid using vessels detained by the PSC due to unsatisfactory crew conditions.

Industry engagement

Ampol participates in industry dialogue to discuss labour standards, crew health and safety and how we, as consumers of maritime service, can contribute to a more sustainable and equitable shipping industry. For example, Ampol contributed its views to the UN Global Compact's 2022 position paper on climate challenges in the shipping industry.

Financial standing

A significant risk for ship crew is posed in the event a vessel owner goes bankrupt and abandons the ship and its crew. Ampol conducts credit checks on all vessel owners to mitigate this risk.

ITF ship lookup

Administered by the International Transport Workers' Federation (ITF), the lookup provides a succinct overview of any concerns identified by the last ITF inspection conducted on board. Where an ITF inspection uncovers problems, including but not limited to low wages, sub-standard living conditions and general employment issues, clarification and further information can be obtained from the vessel's technical operator. The ITF lookup is not an industry-wide practice for vessel clearance and something Ampol elects to do to provide additional assurance.

FUTURE ACTION

We will continue to assess and review the risk of modern slavery for seafarers in our supply chain.

Assessing and addressing modern slavery risk continued

Grievance mechanisms

Grievance mechanisms provide a direct channel of communication between individuals adversely impacted and Ampol.

They provide a way for Ampol to monitor whether our activities are causing, contributing, or directly linked to worker exploitation, and to address such adverse impacts if they are identified.

Ampol is committed to ensuring anyone coming forward with concerns based on reasonable grounds is treated fairly.

Ampol's Grievance Resolution Policy

Ampol's Grievance Resolution Policy provides the mechanism for employees to raise workplace grievances, including issues relating to their working conditions, and have these issues addressed in line with the Ampol values and Code of Conduct.

Whistleblower Policy

Ampol has a Whistleblower Policy which establishes a framework for Ampol to comply with obligations regarding whistleblowers, including legal protections provided by law for whistleblowers. The Whistleblower Policy is designed to protect and encourage our employees, and those external to Ampol with close knowledge of our operations (including employees of suppliers), to report misconduct, including behaviour that is unethical, corrupt or illegal, without fear of retaliation.

Z Energy

Any staff or contractor of Z Energy Limited who becomes aware of a legal, regulatory, policy or other compliance issue, or a breach of the Z Energy Limited's Code of Conduct also have access to a dedicated whistleblower service.

Ampol Hotline

Ampol's grievance mechanisms are supported by an independently run confidential hotline, which is open to Ampol employees, as well as individuals outside Ampol who have knowledge of misconduct relating to Ampol. The hotline allows reports to be made anonymously, and for such matters to be managed and documented securely.

Reports made to the hotline trigger a process within Ampol to assess the report and take further steps, including investigation and remediation if appropriate. Reports made to the Ampol Hotline are monitored and reported to the Executive General Manager, Group General Counsel, Regulation and Company Secretary and the General Manager, Group Risk and Audit on a monthly basis as well as the Board and Human Resources Committee on a six-monthly basis.

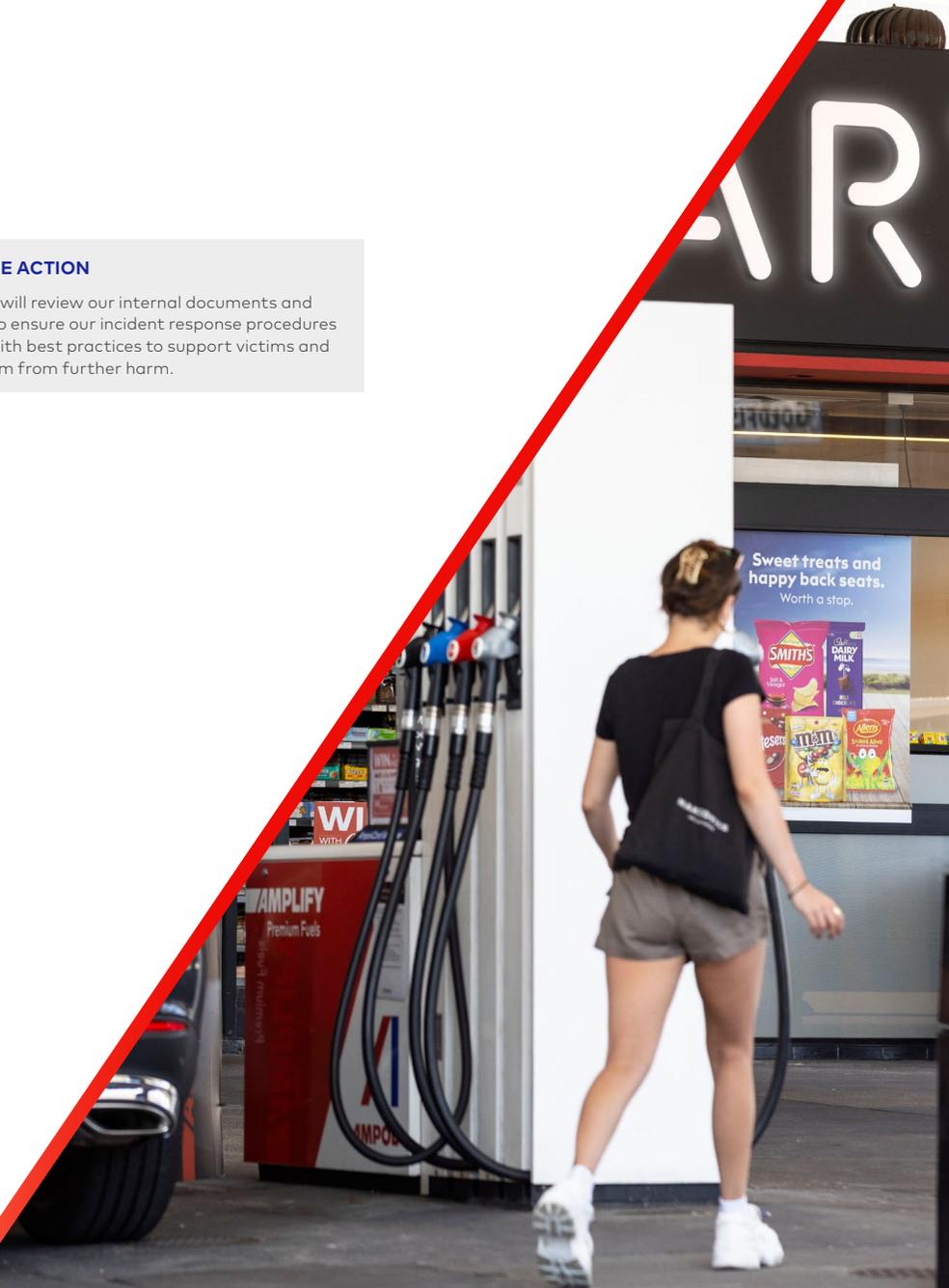
Continuous improvement

Ampol's priority is to protect and support victims of modern slavery. We are committed to best practice corporate governance and regularly review our internal documents and processes.

In 2023, we will review our policies to ensure our incident response procedures are in line with best practices to support victims, and protect them from further harm.

FUTURE ACTION

In 2023, we will review our internal documents and processes to ensure our incident response procedures are in line with best practices to support victims and protect them from further harm.



Assessing and addressing modern slavery risk continued

Training

Ampol employees are trained on Ampol's Code of Conduct obligations and expectations every two years using a mandatory online training module.

All employees and contractors are required to acknowledge and agree to the Ampol Code of Conduct when onboarding. Breaches of the Ampol Code of Conduct can be reported through Ampol's People and Culture team, a person's manager or the Ampol Hotline, and are monitored and reported to the Board and Human Resources Committee on a six-monthly basis.

The Ampol Code of Conduct comprehensively covers and encompasses modern slavery, however additional groups of employees identified to be working in higher risk areas are required to undertake more detailed mandatory modern slavery training. During 2022, modern slavery training for high-risk areas was reviewed and updated.

Topics included in the training are:

- What is modern slavery?
- Modern slavery and its prevalence in Australia and globally
- Why Ampol needs to understand its modern slavery risk
- Modern slavery world facts and data
- Why does modern slavery occur?
- Modern slavery around us
- Modern slavery case studies
- High risk products and services
- How Ampol manages modern slavery risks
- How to recognise potential indicators of modern slavery
- What can we do to combat modern slavery and help victims

Training sessions were used as an opportunity for dialogue to better understand modern slavery risks and management within specific business functions, thereby serving to both upskill employees and deepen Ampol's understanding of the issue.

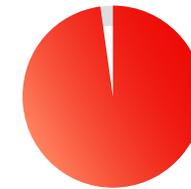
FUTURE ACTION

In 2023 an online modern slavery training module will be developed and launched, enabling more detailed modern slavery training to be rolled out to a greater number of employees.

We will continuously review the Ampol Code of Conduct training to identify opportunities to strengthen employee awareness of modern slavery risks and grievance mechanisms.



As at the end of 2022



98%
of Ampol employees had completed Code of Conduct training within the previous two years

-152 employees

have completed modern slavery training in the past three years encompassing 12 different business functions

Training continues to build awareness across our organisation, empowering team members to engage in open dialogue about modern slavery.

Assessing effectiveness and consultation

We continually look to improve the measurements of effectiveness of our modern slavery program.

Ampol assesses the effectiveness of the actions we take in a number of ways:

- **Governance:** Feedback and assessment from the Board, Safety and Sustainability Committee and ALT on the implementation and progress of Ampol's modern slavery response program.
- **ARMF:** The status and effectiveness of control measures relating to modern slavery risks are assessed via Ampol's ARMF risk assessment process.
- **Policies:** Periodic scheduled reviews of relevant policies, including the Ampol Human Rights Policy.
- **Supplier Code of Conduct compliance:** Monitoring the number of suppliers who acknowledge Ampol's SCoC, the number of suppliers who complete the SCoC supplier questionnaire and the number of verification assessments completed.
- **Audit:** The internal audit function through their strategic planning process, provide the Board and management with an independent and objective assessment of the adequacy, effectiveness, and efficiency of Ampol's risk management, control and governance processes.
- **Contract clauses and tender questions:** Monitoring the number of precedents updated to include relevant modern slavery clauses, and the number of tenders including modern slavery questions and responses.
- **Training:** Monitoring the number of individuals trained.
- **Grievance mechanisms:** Monitoring Ampol's grievance mechanisms to identify trends and issues raised.
- **External engagement:** External engagement with forums, peers and experts in the field to understand best practice and emerging information relating to modern slavery.

As we mature our modern slavery response program, we will look to improve our measurements of effectiveness.

Consultation with owned or controlled entities, including reporting entities

In implementing Ampol's modern slavery response program, Ampol has continued to consult with key stakeholders from relevant parts of the business. This includes consultation with functions which operate across the Ampol Group (including legal, procurement and human resources) as well as targeted operational functions.

In addition, prior to approval by the Ampol Limited Board of Directors, this statement was reviewed by:

- Key members of the ALT responsible for the overall management of the Ampol Group and implementation of its strategy; and
- The directors of Ampol Australia Petroleum Pty Ltd, Ampol Retail Pty Ltd and Ampol Petroleum Distributors Pty Ltd.

Consultation with investments

This statement covers actions being taken by entities owned or controlled by Ampol. Investments in associates and joint ventures which are not controlled by Ampol are approached in a similar manner as suppliers.

The risks in relation to these entities are assessed and prioritised in the context of other Ampol group modern slavery risk categories.

Ongoing engagement with these entities on modern slavery risks occurs based on the risk profile, priority ranking and nature of the relationship with Ampol of the particular investment.



Other relevant information and approval process

Collaboration increases the potential for meaningful change.

We recognise that modern slavery is not a thing of the past and this complex issue requires us to work collaboratively with our suppliers, customers, government and our communities.

Meaningful change and an effective solution require collaboration with governments, the private sector and society, as well as a focus on addressing the problems that contribute to modern slavery, such as poverty, lack of equal education opportunities and access to fair work opportunities.

Commitments and collaboration

The Ampol Foundation, established in 2019, is the vehicle through which we deliver our community investment strategy. By leveraging our financial strength, our network, and our people, we aim to bring value and build capacity in the communities in which we operate in with the focus on improving the lives of Australians. Supported by the Ampol Leadership Team and led by a committee of employees, the foundation focuses activities on two key social areas of need – youth education and development, and community wellbeing and safety.

Our total community investment contribution via the Ampol Foundation for 2022 was over \$4.1m, a 29% increase from 2021.

We are committed to operating our business in a manner that respects human rights by being a participant of the United Nations Global Compact and a signatory to the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption, which include the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

This allows us to actively participate in the Global Compact Network Australia's Modern Slavery Community of Practice meetings. These meetings are aimed at discussing the most pressing challenges and obstacles facing Australian business with respect to managing and communicating modern slavery risks and discussing good practice in responding to these challenges.

Ampol's approach to modern slavery eradication will continue to be collaborative, always reaching out to others to share knowledge.

Addressing the root causes of modern slavery

Reducing inequality and ensuring fair employment opportunities and quality education for all Australians will contribute to creating the underlying social infrastructure needed to eradicate modern slavery. Further information on the work of the Ampol Foundation is set out in Ampol's 2022 Annual Report.

FUTURE ACTION

Ampol will continue to seek and identify additional opportunities to collaborate with others and participate in modern slavery forums.

Approval process

This statement was reviewed and approved by the Board of Directors of Ampol Limited on 12 May 2023. The Ampol Board of Directors will review and update this statement on an annual basis.



Matthew Halliday

Managing Director and CEO

