

# FREEDOM ENERGY GROUP

## MODERN SLAVERY STATEMENT 2024

### INTRODUCTION

This Modern Slavery Statement (**Statement**) has been prepared by Freedom Energy Holdings Pty Ltd A.C.N. 093 243 844 and its associated entities, Freedom Fuels Australia Pty Ltd A.C.N. 093 244 761, Elfont Pty Ltd A.C.N. 050 406 203, Trinity Petroleum Services Pty Ltd A.C.N. 010 708 102 and Freedom Fuels Terminalling Pty Ltd A.C.N. 097 617 082 (**Group**) pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**).

The Act establish modern slavery reporting requirements for reporting entities and submission of an annual modern slavery statement. The Group is required to comply with the Act and other similar legislation or requirements (**Regulations**).

This Statement has been prepared to satisfy the requirements of reporting entities under the Acts and may satisfy requirements of other Regulations, by setting out the actions the Group takes to assess and address modern slavery risks in its operations and supply chains during the reporting period commencing 1 January 2024 and ending 31 March 2025 (**Reporting Period**).

The Group recognises that modern slavery occurs in many forms, such as slavery, servitude, trafficking in persons, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services.

The Group is fully committed to operating responsibility and establishing and adhering to the highest ethical standards. The Group will not tolerate any form of modern slavery in its business.

### WHO WE ARE

The Group consists of two key operating entities, Freedom Fuels Australia Pty Ltd A.C.N. 093 244 761 trading as Freedom Fuels and Trinity Petroleum Services Pty Ltd A.C.N. 010 708 102 trading as Trinity Petroleum.

The Group buys petroleum products for the purpose distributing and selling to wholesale customers, ranging from independently owned service station operators to multi-national mining companies, and operates retail service station sites, including buying goods and services for retail sale.

The Group distributes and supplies petroleum products throughout Queensland, New South Wales and Victoria and employs over 520 people, the majority who are located in Queensland and a small number located in New South Wales.

## OUR OPERATIONS AND RISK OF MODERN SLAVERY

The Group has a significant supply chain and sources quantities of goods and services, including petroleum products, food, drinks, convenience products and other retail items, and services provided to the Group's offices, retail service station sites and customers.

The Group recognises that the risk of modern slavery is influenced by factors such as vulnerable populations, goods and service categories, industry and geographic location.

In FY24, the Group worked with more than 1500 suppliers. The Group assessed its risk of modern slavery as low taking into account the nature of the goods and services, the regions and industries the goods and services are sourced from.

Although the Group's risk of modern slavery is low, the Group recognises that the risk of modern slavery may be higher further down the supply chain as a result of the countries where raw materials are sourced from or equipment is manufactured by its suppliers.

The Group acknowledges that its systematic approach, procurement practices, practices and dealings with suppliers are essential elements of progressing the eradication of modern slavery and improving human rights globally.

## ASSESSING AND ADDRESSING RISKS OF MODERN SLAVERY

The Group manages its modern slavery risk by maintaining a framework for identifying, assessing and managing modern slavery risks across its operations and supply chains. As part of the framework, the Group:

- maintains policies and procedures to assist with identifying, assessing, managing and mitigating modern slavery risks, including a whistleblower policy;
- carries out due diligence of its suppliers by issuing suppliers with a questionnaire each year requesting information on actions the supplier takes to identify, assess and mitigate risk of modern slavery in their business and compliance with the Act;
- ensures that all contracts have express clauses requiring all parties to comply with the Act;
- provides education and training to all employees to ensure awareness of the risks of modern slavery and steps to be taken to address modern slavery; and
- provides tailored education and training to employees who deal directly with suppliers to provide them with the knowledge and skills to identify, address and mitigate risks of modern slavery.

If the Group becomes aware that a supplier does not comply with the Act, the Group will cease to obtain supply of goods and services from the supplier and may report the supplier with the intention to address and remediate instances of, or the risk of, modern slavery.

## ASSESSMENT OF EFFECTIVENESS OF ACTIONS AND NEXT STEPS

The Group is committed to continuous and ongoing assessment of the risks of modern slavery and its framework to assess the effectiveness of its actions.

Each year, the Group's Senior Management Team will review its framework for identifying, assessing and managing modern slavery risks, including its policies and procedures for mitigating and responding to risks of modern slavery.

Every 3 months, the Group's Risk Committee will carry out risk assessments of its operations and supply chain and if necessary, continue to regularly monitor to ensure compliance with the Act.

The Group will continue to review its framework and carry out risk assessments of its operations and supply chain to mitigate the risks of modern slavery.

## CONSULTATION

During the Reporting Period, the Board of the Group actively engaged and consulted with Freedom Energy Holdings Pty Ltd and all associated entities in the development and implementation of this Statement. The Board of the Group reviewed the requirements of the Act, including the reporting requirements, the actions the Group took in addressing the requirements of the Act and this Statement.

The Group will publish this Statement on its website and intranet sites.

This Statement was approved by the Board of the Group and is signed on its behalf by Director and Chief Executive Officer, Mark McKenzie.

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 Mark McKenzie, Sep 30, 2025 17:02:59 GMT+10

**Mark McKenzie**

**Director and Chief Executive Officer**

**Freedom Energy Holdings Pty Ltd and associated entities**

# Modern Slavery Statement 2024

Final Audit Report

2025-09-30

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