



Modern Slavery Statement 2023

Helping people reach their destination

Modern Slavery Statement 2023



The 2023 year saw a significant transformation of our workforce and their functions. Our employee numbers increased five-fold to approximately 8,000, most notably due to the Coles Express team members joining our Convenience & Mobility team. As our business continues to transform, we remain focused on safety, maintaining our strong safety philosophy and culture of care across all our businesses.

Introduction

2023 was a transformational year for our Company with the acquisition of Coles Express and OTR Group¹ providing the platforms to establish Viva Energy as the leading convenience retailer in Australia. Together with the continued diversification of our Commercial & Industrial business and development of new energy opportunities in hydrogen, lower carbon fuels and recycled waste, we are establishing foundations to maintain growth and successfully manage the energy transition.

The acquisitions in our Convenience & Mobility business will enable the Company to derive more earnings in the segment from convenience sales, reducing reliance on fuel income over time. The business will also create a compelling offer to support the introduction of electric vehicle recharging facilities over the coming years. EV recharging is expected to be an important part of our broader convenience offer in the future, strongly integrated into the overall customer experience.

As a result of these acquisitions, 2023 saw a significant transformation of our workforce and their functions. Our employee numbers increased five-fold to approximately 8,000, most notably due to the Coles Express team members joining our Convenience & Mobility team. As our business continues to transform, we remain focused on safety, maintaining our strong safety philosophy and culture of care across all our businesses.

These acquisitions have also seen a new segment of third party suppliers and products that the Company is now handling. With these changes, our commitment to achieving sustainable outcomes, by upholding a code of conduct that is ethical, responsible, and respectful of customers, communities, our people and other stakeholders including suppliers in our supply chains has been maintained. This includes an increasing focus on doing everything we can as a company to mitigate the global problem of modern slavery. Viva Energy has zero tolerance for all forms of modern slavery.

Our Company's work has assessed the modern slavery risk in our operations and supply chains to be low. There have been no allegations of modern slavery within our direct operations, and we are not aware of any against our suppliers.

Given the changes in our business, our Company's focus during the year has been to gain a better understanding of the location of key inputs into the new products and services we acquire. This has required us to engage closely with these new suppliers. We also continue our efforts to establish a culture of awareness and understanding of modern slavery risks right through the organisation through a modern slavery training program which has been taken by all senior leaders and staff with responsibility for managing people and supplier procurement.

While our work in this space provides us with confidence that our modern slavery risk is low, given that our business and supply chains continue to evolve, we will need to continue to revise the scope of work we undertake in this area. In 2024, we will again focus on the risks associated with the material construction work we are undertaking in building of additional diesel storage capacity and upgrades to the Geelong Refinery to produce ultra-low sulphur petrol, along with the risks associated with the acquisition of the OTR Group. We have made public commitments through this statement to hold us accountable to this outcome, and I am determined that we continue to play our part in building a better world for all people.

If you have any questions or feedback on this statement, please do not hesitate to contact us via www.vivaenergy.com.au.



Scott Wyatt
Chief Executive Officer

28 March 2024

1. OTR Group acquisition completed on 28 March 2024.

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Highlights



Completed a **deeper dive** into understanding modern slavery risks of the growing **Convenience & Mobility** business including working closely with our key supplier being the Coles group, while also undertaking a root cause assessment of risks and mapping of the supply chain beyond the Tier 1 level.



Completed a **deeper dive** into understanding modern slavery risks of the construction work supporting the Company's growing current capital upgrade program at **Geelong Refinery**, including working closely with our main construction contractor and understanding their Tier 2 supply chain including visiting their offshore operations to better assess that risk.



Continued to work with Vitol group, who charters and co-ordinates most of Viva Energy's fuel shipping requirements, to embed our understanding of the process for **managing seafarer welfare** to maintain our confidence that the vetting processes undertaken are appropriate to mitigate the risks of modern slavery in those operations.



Engagement of an external consultant to examine the effectiveness of key processes and controls implemented to manage modern slavery risks within the Company's operations and supply chains. The outcomes of this review included the **establishment of a Modern Slavery Committee** with cross-functional representation from relevant departments across the Viva Energy group including Procurement, Legal, People & Culture, Sustainability and Finance.



Continued the rollout of the compulsory **modern slavery training program**, which has now been undertaken by 372 people in our workforce, up from 191 in 2022, including all senior leaders and staff with responsibility for managing external supplier procurement, along with relevant staff within the newly acquired Convenience business.



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1. Our commitment and approach to governance

1.1 General

The Board of Viva Energy Group Limited has oversight of sustainability matters, including how these are integrated into corporate strategy and risk management systems. The Board is supported in this role on sustainability matters by various committees, including the Sustainability Committee.

The Board Sustainability Committee is responsible for reviewing the Group's sustainability performance, compliance and disclosures in relation to health, safety, security and environment and community (HSSEC) matters, and greenhouse gas emissions.



In 2023, the Board and its various Committees were engaged on the following sustainability related matters:

- Reviewing and discussing the Group's strategy, risks, and opportunities;
- Reviewing and approving the objectives, targets and key performance indicators that will drive continuous improvement in HSSEC performance;
- Reviewing and approving the objectives, targets and policy that drive the Group's Inclusion and Diversity objectives;
- Monitoring significant changes to HSSEC and People risk profile or business strategy;
- Receiving updates on the Group's greenhouse gas emissions and energy performance, and approving management's emissions reduction plans within the Convenience & Mobility business;
- Providing oversight and approval of new energy strategies;
- Receiving updates on investigations into significant occupational health and safety, sexual harassment, environmental or product quality incidents and the associated actions to prevent the recurrence of those incidents;
- Overseeing risk management framework and performance against the framework, including (among others) cyber security, security of critical infrastructure, external fraud and modern slavery risks.

Our Board and management are committed to our sustainability agenda – protecting shareholder value by upholding a code of conduct that is ethical, responsible and respectful of our stakeholders.

1.2 Modern slavery governance

After finalising its initial deep dive into the Company's modern slavery risks as set out in its 2022 Statement, in 2023, Viva Energy entered the next phase of its continuous cycle of understanding, reviewing and improving its assurance of the Company's modern slavery risks.

This next phase has involved a deeper analysis of the new risks associated with the Company's expanding Convenience & Mobility business and increased construction activity, both presenting inherently higher modern slavery risks. The outcomes of that investigation are more fully described in sections 4 and 6 of this Joint Statement.

In addition, during 2023, the Company engaged an external consultant to examine the effectiveness of its key processes and controls implemented to manage modern slavery risks within its operations and supply chains. The outcomes of this review are set out more fully in section 5.2 of this Joint Statement.

An important outcome of this review was the establishment of a Modern Slavery Committee with cross-functional representation from relevant departments across the Viva Energy group including Procurement, Legal, People & Culture, Sustainability and Finance.

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The Modern Slavery Committee meets quarterly to share insights, discuss challenges, and align efforts across the Viva Energy group to address modern slavery risks and has provided greater clarity with respect to the:

- Roles and responsibilities for the management and reporting of modern slavery risks of all stakeholders involved in the modern slavery program of work across the Viva Energy Group.
- Processes and procedures for identifying, assessing, and addressing modern slavery risks to ensure compliance with legal requirements and alignment with industry best practices.
- Internal and external consultation process to assess modern slavery risks across Viva Energy's owned and controlled entities.
- Annual work plan, providing clear timelines and activity breakdowns to support the delivery of modern slavery initiatives.
- Processes to report on progress and performance of initiatives committed within the Company's Modern Slavery Statements and the results of the Company's ongoing modern slavery risk management.

The outcomes of that Committee's work are formally reported back to the Company's Audit and Risk Committee (ARC) on a regular basis. During 2023, there were 3 engagements with the ARC with respect to modern slavery matters:

- February 2023 to communicate outcomes of the 2022 review and receive endorsement for the 2022 Statement, and
- August 2023 and December 2023 to update the ARC of progress against the Company's 2023 commitments.

Modern Slavery Act reporting requirement

This statement addresses the mandatory criteria in the Act. The table below outlines the sections in which the items have been addressed in the Joint Statement.

Modern Slavery Act requirement	Section in Joint Statement	Page no.
1. Identify the reporting entity	Section 2 – Reporting entities	5
2. Describe the structure, operations and supply chains of the reporting entity	Section 3 – Organisational structure, operations and supply chain	6
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls	Section 4 – Risks of modern slavery practices	10
4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	Sections 5 & 6 – Due Diligence and Risk Management – Our Approach & 2023 Outcomes	13
5. Describe how the reporting entity assesses the effectiveness of these actions	Section 7 – Assessing effectiveness and looking forward	26
6. Describe the process of consultation with any entities that the reporting entity owns or controls	Section 3.1 – Organisational Structure	6
7. Provide any other relevant information	The information in the Joint Statement directly addresses the first six criteria.	

2. Reporting entities

This Modern Slavery Statement has been prepared in line with the requirements of the *Modern Slavery Act 2018* (Cth) (the **Act**) for the year 1 January 2023 to 31 December 2023.

The statement is a Joint Modern Slavery Statement (**Joint Statement**) covering the following entities, which are reporting entities under the Act:

Reporting entity	ACN
Viva Energy Group Limited	626 661 032
Viva Energy Holding Pty Ltd	167 883 525
Viva Energy Australia Group Pty Ltd	004 400 220
Viva Energy Australia Pty Ltd	004 610 459
Viva Energy Refining Pty Ltd	004 303 842
Viva Energy Aviation Pty Ltd	167 761 453
Liberty Oil Holdings Pty Ltd	068 080 124
Liberty Oil Australia Holdings Pty Ltd	107 226 880
Liberty Oil Corporation Pty Ltd	088 411 072
Liberty Oil Australia Pty Ltd	114 544 437
Viva Energy Polymers Holdings Pty Ltd	066 270 237
Viva Energy Polymers Pty Ltd	004 327 762
Viva Energy Retail Pty Ltd	662 372 027

In addition to the above entities, this Joint Statement has been made on behalf of all entities controlled by the above reporting entities (collectively referred to as Viva Energy).

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3. Organisational structure, operations and supply chains

3.1 Organisational structure

Viva Energy Group Limited is a company incorporated in Australia whose shares are publicly traded on the Australian Securities Exchange (ASX: VEA).

The headquarters of Viva Energy Group Limited is located in Melbourne, at Level 16, 720 Bourke Street, Docklands, Vic 3008. The registered office of all reporting entities covered by this Joint Statement is located in Melbourne, at Level 16, 720 Bourke Street, Docklands, Vic 3008.

Viva Energy Group Limited is the parent company of the group, which includes 42 controlled entities. A full list of the controlled entities is included at Note 27 to the consolidated financial statements within Viva Energy's 2023 Annual Report.

All of the reporting entities share the same governance framework for Modern Slavery risks as set out in section 2 of this Joint Statement, resulting in a single common approach to identifying and managing human rights risks, applying across all entities. This Joint Statement provides a joint description of the actions to address modern slavery across all the reporting entities and was developed through consultation between the entities, and has been approved by the Board of Viva Energy Group Limited on its own behalf and on behalf of its wholly owned subsidiaries.

3.2 Our operations and locations

Following the acquisition of Coles Express and the OTR Group, Viva Energy will become the largest convenience retailer in Australia with more than 1,000 stores, 14,000 employees across the Group, and annual convenience sales revenue of more the \$3 billion. The broadening of our convenience offers, and the integration of quick service restaurants and electric vehicle recharging facilities present consistent growth opportunities in this fast-growing retail segment.

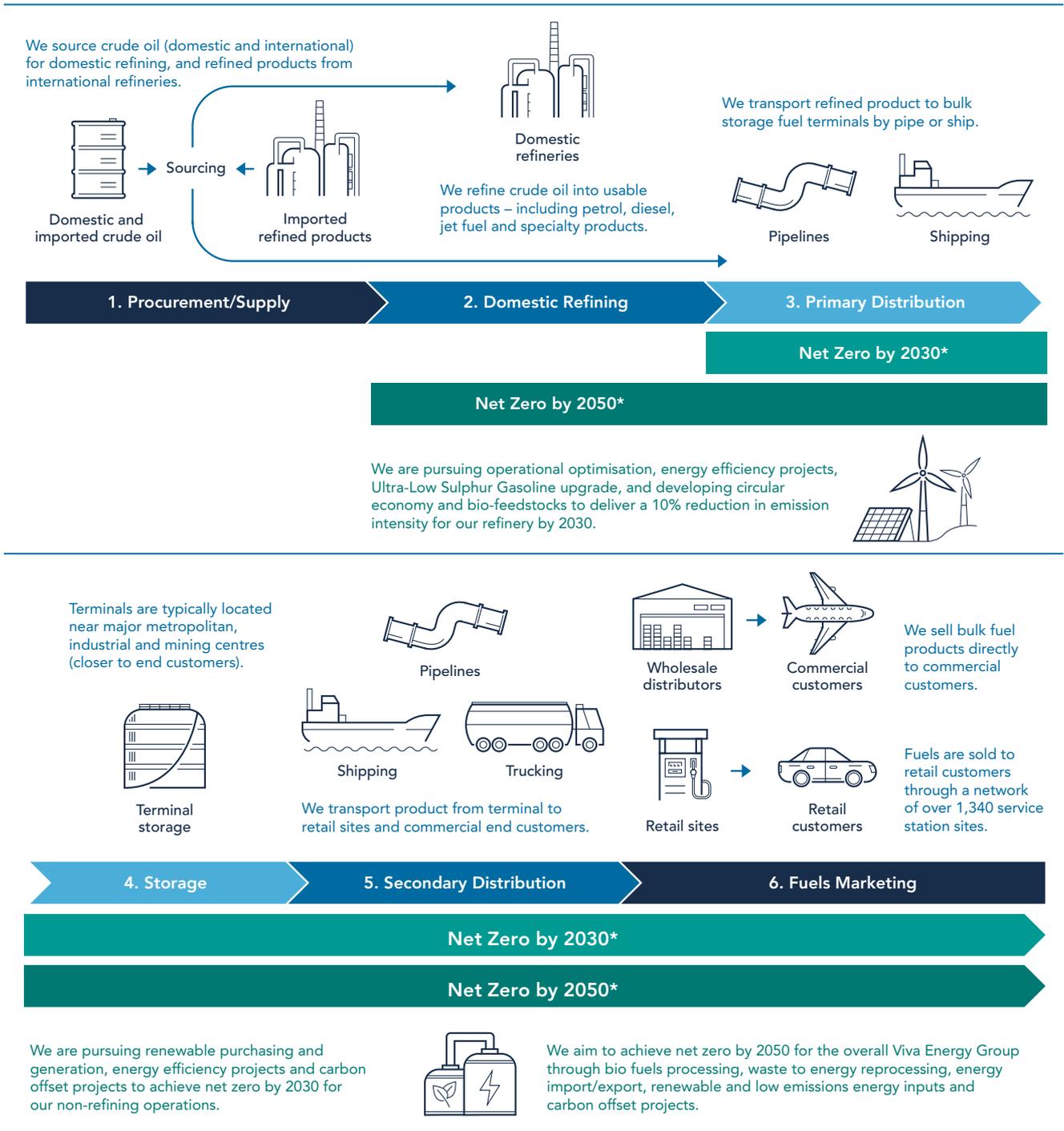
With leading positions in resources, aviation, marine, road construction, agriculture, defence and commercial road transport sectors, Viva Energy is well placed to support the growing energy and non-energy requirements of commercial and industrial customers. Our global access to both traditional and emerging renewable energies, as well as a range of locally produced specialty products such as niche fuels (including military grade), bitumen, solvents and polymers, builds deep relationships with customers and provides strong long-term sustainable growth opportunities.

Our extensive nationwide energy infrastructure, including the strategically important refinery at Geelong and a network of more than 20 import capable fuel storage facilities, provides advantaged positions to supply customers with traditional fuels, and transition to the production and distribution of renewable energies, such as sustainable aviation fuels and renewable diesel, as these new energies are developed and commercialised. Supplying 25% of Australia's fuel needs, Viva Energy plays an important role in providing energy security, as well as supporting the energy transition.

A summary of Viva Energy's operations is set out in the diagram and table on the following pages.



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* Net Zero commitment applies to Scope 1 and 2 emissions for activities under our operational control which excludes primary and secondary distribution by shipping.

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3.3 Our workforce

The Viva Energy group comprises approximately 8,000 team members based in our State offices and on-site at retail service stations, terminals and refinery operations. All of the Company's workforce are provided with robust on boarding, induction and training to build their knowledge and understanding of the Company's Code of Conduct, values and standards of behaviour, in addition to all policies and procedures relevant to their role and work site. This provides team members with the tools needed to maintain and uphold the Company's policies and procedures, while ensuring that they are supported to identify modern slavery risks and non-compliance.

Composition of Viva Energy workforce

Terms of Employment	EBA	Salaried	TOTAL
Full-time	1,249	1,474	2,723
Part-time	2,534	122	2,656
Casual	2,391	3	2,394
Total	6,174	1,599	7,773

Other than two Singapore-based employees, all of Viva Energy's workforce is based in Australia. In relation to Viva Energy's workforce, 34% are based in regional locations.



3.4 Our supply chain

3.4.1 General supply chain

The table below details the most material categories of third party spend incurred across Viva Energy's operations. Virtually all of the key suppliers (by spend) in the listed categories are located in Australia with the exceptions being the suppliers of crude oil and fuel products, chemicals and catalysts, and fuel shipping. Many of the categories of spend apply to more than one of the operational lines, but have been included where most appropriate in the table for simplicity.

Operations	Key third party spend
 Convenience & Mobility	<ul style="list-style-type: none"> • see detailed summary in section 3.4.2
 Commercial & Industrial	<ul style="list-style-type: none"> • Road and rail transport services
 Energy & Infrastructure	<ul style="list-style-type: none"> • Major services contractors • Environmental services • Energy providers • Chemicals and catalysts supply • Personal protective equipment and uniforms • Engineering services

The following operations and categories of spend apply to all operational lines so have been separately listed in the table below. It is noted that certain spend categories such as biofuels and catering are not material, but have been included in the table given their higher perceived risk profile for modern slavery purposes.

Operations	Key third party spend
 Procurement of Crude Oil and Refined Products	<ul style="list-style-type: none"> • Crude oil and product supply • Fuel shipping • Biofuels supply
 Corporate Overheads	<ul style="list-style-type: none"> • Business administration services • IT equipment and services • Cleaning and catering

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Excluding suppliers of crude oil and fuel products, chemicals and catalysts, and fuel shipping, set out below is the composition of the Company's suppliers at a glance:

9,000+	different goods and services are procured annually
2,900+	suppliers of different goods and services
97%	of procurement spend is conducted with Australian based entities.
33	countries where our Tier 1 suppliers are based with the largest being: Australia (97% of spend), United Kingdom (1%), and France (1%).

In a business such as Viva Energy we have an extensive list of suppliers who either provide goods and services directly or who are contracted by our suppliers. Regardless of the depth of our supplier-network, Viva Energy acknowledges the onus remains on us to perform due-diligence and understand where the major risk areas are. For us to be able to holistically view our supply chain and commence performing our risk management approach, the Company identifies and appropriately segments our supplier-base into Tier 1 or Tier 2 suppliers.

Tier 1 (Direct) suppliers – Viva Energy retains nearly 3,000 Tier 1 suppliers from whom we procure goods and services.

As a business with deep roots in the Australian market, Viva Energy has longstanding partnerships with these key Tier 1 suppliers who understand, respect and meet our quality and supply standards. We seek to limit the amount of sub-contracting that our suppliers can do, meaning we can more adequately audit and control our supply chain and leave it in the safe hands of our contracted suppliers. The closer we can keep our supplier relationships, the more effectively we can control quality and ethical standards.

Tier 2 (Secondary) suppliers – Viva Energy also has a significant network of Tier 2 suppliers. These are suppliers who supply goods and services directly to our Tier 1 suppliers. Without the inputs of our Tier 2 suppliers, our Tier 1 suppliers could not provide the goods and services we need to run and manage our business. Tier 2 supplier networks are generally more numerous in supplier numbers, more complex, more fragmented and more global in nature.

Our exposure to modern slavery risk increases when we incorporate Tier 2 suppliers. Viva Energy recognises and operates under the view that it remains our responsibility to monitor Tier 2 suppliers directly and ensure our Tier 1 suppliers have adequate processes and policies in place to aid in monitoring the risk in the Tier 2 supplier-network.

3.4.2 Convenience & Mobility supply chain

Within the Company's Convenience & Mobility business, we segment our supply-base across two major portfolios:

- **Goods for resale (GFR)** – products that are sourced for sale in our retail stores procured from suppliers, and
- **Goods not for resale (GNFR)** – items that we acquire for purposes other than for sale directly to the Company's customers and used for internal operations, such as running the business or providing services.

The table below outlines Viva's GFR and GNFR portfolio:

Type of good	Examples of purchased product
Goods for resale (GFR)	
Grocery items	Confectionery, soft drinks, milk, bread, gums and mints, ice-cream and snacks
Readymade food & beverage	Coffee, sandwiches, baked goods, frozen carbonated beverages and fast food
Household items	Toilet paper, sunscreen, cleaning and hygiene products
Toys and accessories	Promotional toys, gifts, hats and sunglasses
Tobacco	Cigarettes, packaged tobacco and smoking accessories
Other	Publications, newspapers, bait, ice, gas bottles and gift cards
Goods not for resale (GNFR)	
Store operations	Uniforms, maintenance services, waste services, security and store supplies
Energy	Gas and electricity, energy consulting and services
Marketing	Creative, media, print and promotional materials
Capital	Store infrastructure, project management services and building supplies
Technology	Hardware, software and IT-related services
Supply chain	Transport, warehousing and other logistics services
Packaging	Paper food bags, coffee cups, lids and trays
Property	In-store maintenance, property development and leasing

The Company has built a robust and extensive supply chain to ensure we can support our operations and continue to deliver the service that our customers are used to. We partner with our suppliers and set expectations to minimise our exposure to modern slavery risks within our supply chain.

Viva Energy's GFR products are purchased via the following supply scenarios:

- Products directly sourced from factories (Direct to store) and manufacturing partners; or
- Products sourced from trade partners who source from factories and manufacturers.

Behind the arrangements the Company's Convenience & Mobility business has with its direct suppliers, we understand there may be multiple supply chain layers that the Company is not exposed to. This may be the procurement of raw materials for manufacturing or other service providers our suppliers have engaged to buy goods or perform a service. Therefore, the Company's approach to managing risks must involve setting expectations not just on the behaviour of direct suppliers (Tier 1), but also on the behaviour of secondary suppliers (Tier 2).

Through this approach we have found that our longest serving and most important supplier relationships are with organisations who place as much value on ethical sourcing standards as we do.

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4. Risks of modern slavery practices

The work undertaken as described in Viva Energy’s first three Modern Slavery Statements has enabled Viva Energy to obtain a level of confidence that its modern slavery risk is low. Consistent with this conclusion, in 2023, Viva Energy did not identify any actual instances or allegations of modern slavery within the direct operations of Viva Energy, and we did not become aware of any modern slavery allegations against any supplier.

While this is a welcome conclusion, given that our business and supply chains continue to evolve, the Company is aware that it will need to continue to revise the scope of work it undertakes in this area.

Viva Energy’s overall approach to managing modern slavery risks across its operations and supply chains is set out in section 5 of this Joint Statement. Based on that approach, as set out in the Company’s 2022 Statement, the 2023 focus areas for the Company’s modern slavery risk assessment and due diligence work have been:

Focus area	Key actions in 2023	Relevant section
Review of operations and supply chains – Coles Express acquisition	The completion of this acquisition has exposed the Company to new modern slavery risks as it involves Viva Energy acquiring goods for resale which pose inherently higher modern slavery risks such as fresh produce and raw material food ingredients such as cocoa, tobacco and seafood. Viva Energy has undertaken a deep dive into the supply chains for these higher risk goods.	4.2.2 & 6.2.2
Review of operations and supply chains – construction activity	The material construction program undertaken by the Company during 2023 involved Viva Energy being exposed to a sector which can involve a range of modern slavery risks due to factors such as reliance on low-wage and migrant labour, complex supply chains and sourcing of material from higher-risk geographies. An assessment was undertaken of our contractors to understand how they are managing modern slavery risks in practice including with respect to subcontracting, utilisation of labour hire and migrant workers.	4.2.3 & 6.2.3
Building culture and awareness	Viva Energy has continued to develop its internal capability to identify modern slavery risks including the taking of further steps to ensure broader awareness and understanding of risks across the Viva Energy group.	6.3

4.1 Our operations and workforce

Viva Energy’s assessment is that the level of risk of modern slavery in its direct operations is low.

Our operated assets are entirely in Australia. In addition, Viva Energy’s employees are predominantly skilled workers engaged in Australia. More specifically:

- Other than two Singapore-based employees, all of Viva Energy’s workforce is based in Australia.
- Most employees are employed directly into skilled roles. While there may be varying levels of experience, the employees are supported by competency based on the job training provided by the Company, or via third party contracting companies that require contracted employees to abide by the Code of Conduct and induction processes.
- The frameworks that regulate conditions of employment in the industry provide robust safeguards against modern slavery practices occurring in Viva Energy’s operations.

Further, Viva Energy takes the following steps to manage its workforce through its operations:

- Our recruitment process captures both age and eligibility to work to ensure we are meeting the ‘minimum age for admission to employment’ requirements.
- Expected workplace behaviours are covered in our induction for new employees, where they learn about our values and expected Viva Energy behaviours, as set out in the Code of Conduct.
- All employees and contractors must confirm their understanding of the Code of Conduct at least once every two years.
- All employees must complete mandatory training on anti-bribery and anti-corruption, equal employment opportunity and workplace health and safety once every two years.

In order to assess the Company’s involvement and relationship with modern slavery risk, Viva Energy aligns to the UN Guiding Principles on Business and Human Rights (UNGPs), which categorise risk into three parts: modern slavery risks that the company causes, contributes to or is directly linked to.



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In that regard, Viva Energy considers the risk of its own actions causing an adverse modern slavery impact to be low. Accordingly, to the extent there is any adverse modern slavery impact associated with Viva Energy’s operations, this is likely to be due to Viva Energy either contributing to, or being directly linked to, such impact (as distinct from ‘causing’ the impact). For example, if there is an allegation of modern slavery against a supplier with whom Viva Energy deals, Viva Energy may be considered to have contributed to this adverse modern slavery impact, or to be linked to it. The conclusions of our risk assessment of modern slavery existing in Viva Energy’s supply chain is set out below.

4.2 Our supply chain

4.2.1 General supply chain

Viva Energy’s assessment is that the level of risk of modern slavery in its overall supply chain is low.

The basis for this conclusion is that the vast majority of Viva Energy’s suppliers possess one or a combination of the following features:

- They are located and operate within Australia with no or minimal foreign connection. In 2023, excluding foreign suppliers of oil products, chemicals and catalysts and shipping services, approximately 95% of our direct suppliers by number and 97% by value were located in Australia.
- They supply equipment, materials, or other inputs that are technically difficult to produce and that would therefore more likely to have been sourced from a country posing a low modern slavery risk (to the extent they were sourced from offshore locations).

- They operate in industries which are subject to significant regulation with strong employee protection mechanisms.
- In the case of the procurement of crude oil and other hydrocarbon products, our supply chain includes purchasing those products either through our direct affiliate based in Singapore or other suppliers located in Australia. In that regard, it is noted that, while the original source of those products may in some cases have been located in a country with a higher inherent modern slavery risk, the production, operation and trading of these products requires technical and professional skills and use of capital intensive assets that are at a low risk for modern slavery.
- Where suppliers operate in categories where there is an inherently higher modern slavery risk such as fuel shipping and construction, Viva Energy has sought to actively monitor and review any modern slavery risk, thereby reducing the risk of non-compliance.

4.2.2 Convenience & Mobility supply chain

Although the Company’s assessment is that there is a low level of modern slavery risk exposure in our general supply chain due to the localisation of the Company’s supply chain and the robust approach we and our partners take to assessing risk, the retail network does pose a heightened inherent risk.

Based on our assessments, we have outlined examples below of products and services within our Convenience & Mobility supply chain where we have a greater exposure to modern slavery.

Higher risk areas

Potential risks

Sourcing and processing of raw materials such as tobacco, cocoa, tea and coffee from manufacturers who supply our GFR

- Lack of visibility of working conditions in some origins of these raw materials
- Reliance on migrant and unskilled labour force
- Higher likelihood of forced labour and child labour
- Lack of available information
- Absence of controls to manage risk and events of modern slavery

Manufacturing in our GFR supply chain, such as toys, gadgets and accessories

- Lack of visibility of working conditions
- Unfair recruitment processes in some manufacturing countries
- Reliance on migrant and unskilled labour
- Complex and fragmented supply chains
- Lack of available information
- Absence of controls to manage risk and events of modern slavery

Manufacturing of goods in our GNFR supply chain, such as uniforms, IT hardware and solar panels

- Lack of visibility of working conditions
- Unfair recruitment processes in some manufacturing countries
- Reliance on migrant and unskilled labour
- Complex and fragmented supply chains
- Lack of available information
- Absence of controls to manage risk and events of modern slavery

Services provided to run our day-to-day operations, including: safety, security, construction and facilities management

- High-level of sub-contracting
- Use of labour hire, migrant workers and unskilled labour
- Opaque recruitment practices

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4.2.3 Construction works supply chain

The Company is currently embarking on an intensive capital investment program to meet changing energy requirements. In that regard, the Company recognises that there are a multitude of inherent modern slavery risks in the construction sector that can manifest in different forms, including forced labour, debt bondage, and poor working conditions. Some specific factors contributing to these risks are set out in the table below:

4.2.4 Fuel shipping

During 2021 and 2022, we undertook a deep dive into Viva Energy’s vessel and crew vetting processes for the operation of vessels used to transport crude oil and finished products. As part of this exercise, we engaged with Vitol, our key supplier of crude oil and vessel chartering activities, to better understand Vitol’s vetting process for vessels and crew. This work provided comfort that a thorough vetting process is undertaken by Viva Energy, which is supported by our understanding of the work undertaken by Vitol.

During 2023, we engaged further with Vitol to get a deeper understanding of the steps they take to manage modern slavery risks in this area. The results of that review are set out in section 6.2.4 of this Joint Statement.

Higher risk areas	Potential risks
Global supply chains	<ul style="list-style-type: none"> Construction projects often involve extensive and global supply chains, making it challenging to trace the origin of materials and the labour used.
Subcontracting practices	<ul style="list-style-type: none"> Many construction projects involve subcontractors and sub-subcontractors. This tiered structure can create opportunities for exploitation, as responsibility for labour practices may become less clear as one moves down the supply chain.
Low-skilled labour	<ul style="list-style-type: none"> The construction industry often relies on low-skilled and manual labour, and workers in these roles may be more vulnerable to exploitation due to limited employment options and knowledge of their rights
Migration and temporary employment	<ul style="list-style-type: none"> Migrant workers and those on temporary contracts may be particularly vulnerable to exploitation, as they may lack familiarity with local labour laws, face language barriers, and fear repercussions such as deportation.
Working conditions	<ul style="list-style-type: none"> Poor working conditions, inadequate health and safety standards, and lack of access to proper accommodation are common issues in the construction industry.
Document retention	<ul style="list-style-type: none"> Modern slavery perpetrators may exploit workers by confiscating identity documents, making it difficult for individuals to leave or seek assistance.
Lack of awareness	<ul style="list-style-type: none"> Many workers may not be aware of their rights or may fear retaliation if they speak out against exploitation. This lack of awareness can make it challenging to identify and address instances of modern slavery



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5. Due diligence and risk management – our approach

5.1 General

Viva Energy’s approach to managing modern slavery risks across its operations and supply chains is based on:

- Regular targeted reviews of its operations and supply chains, and
- Building Viva Energy’s culture of zero acceptance of modern slavery both in its own operations and its supply chain.

The table below sets out the overall approach that Viva Energy adopts to ensure a continuous cycle of understanding, review and improvement of its assurance of the Company’s modern slavery risks.

Year	Phase	Summary	Actions
1-3	Assurance Review 	<p>Viva Energy’s goal in the foundation years was to establish a good understanding of where risks exist in its operations and supply chains through a greater interrogation of its larger and potentially higher risk suppliers.</p> <p>At the same time, the Company also targeted in this time the establishment of a culture of awareness and understanding of modern slavery risks both through the Company itself and its suppliers.</p>	<p>In the 2020-2022 years, Viva Energy undertook a deeper dive into understanding the risks with existing operations and supply chains through the use of various external tools and a deeper dialogue with its suppliers.</p> <p>The Company also set up a program of education to embed an awareness and ability to identify modern slavery risks through the Company. We have also included modern slavery considerations into procurement activities to establish that same culture through our supply chain.</p>
4-5	Monitor & Maintain 	<p>Having established a good understanding of risks in its existing operations and supply chains, the aim is then to monitor outcomes to assess whether there has been any change in the level of modern slavery risk. This is consistent with the Company’s targeted approach.</p> <p>We will also continue to embed the culture of zero tolerance through our operations and supply chain on an ongoing basis.</p>	<p>During these monitor and maintain years, the review will focus on areas that require additional assurance over and above the work undertaken in the foundation years:</p> <ul style="list-style-type: none"> • New operations or components of the supply chain, eg through acquisition of new businesses, • Supply chains where risk may have been heightened by political, business or other events, and • Any areas where our regular business interaction with existing suppliers may have identified a potential risk.
6	Refresh 	<p>It will be appropriate to refresh our confidence in the modern slavery risk conclusions by undertaking a more comprehensive review into the Company’s operations and supply chain at regular intervals.</p> <p>At the same time, Viva Energy will consider the overall effectiveness of its approach to addressing modern slavery risks and commence planning for the next cycle.</p>	<p>This will involve a deeper dive into areas already assured, much like the foundation year assurance exercise, but likely not as extensive given the work already undertaken.</p>

Modern Slavery Statement 2023

The 2023 year represents Year 4 of the implementation of the Company's modern slavery program. Moving into the Monitor & Maintain phase of the program, we have increased our efforts in those areas that require additional assurance over and above the work undertaken in the foundation years of the program through 2020 to 2022. Consistent with our focus areas as set out in the Company's 2022 Statement, the objective in 2023 has been to focus on:

- The new areas of Viva Energy's supply chain being the newly acquired convenience component of Viva Energy's Convenience & Mobility business,
- The Company's growing construction activities in these years, and
- Continuing to embed a program of awareness of modern slavery risk through the Company by continuing to develop and enhance the modern slavery assurance program.

5.2 External review of program

Having finalised its foundational work related to the Company's modern slavery risks as set out in the table in section 5.1 above, during 2023 Viva Energy entered the next phase of its continuous cycle of understanding, reviewing and improving its assurance of the Company's modern slavery risks.

This next phase involved engagement by the Company of an external specialist to examine the effectiveness of the key processes and controls implemented by the Company to manage modern slavery risks within its operations and supply chains. This review was undertaken by an external consultant and the outcomes of this review are set out more fully in the Case Study below.

Case study | External review of Viva Energy's modern slavery program

The scope of this review included an examination of:

- The clarity of roles and responsibilities to execute on modern slavery risk management, including the execution of modern slavery policies and reporting.
- The policies and procedures established by the Company to address, mitigate and remediate modern slavery risks in its operations and supply chains.
- The processes to identify and assess the impact of any modern slavery risks or risk indicators in the Company's operations and supply chains.
- The processes and controls in place to ensure compliance with key requirements of the Act.
- The level of management reporting and oversight activities to monitor the performance and progress of priorities and initiatives, to support the disclosure in the Company's Modern Slavery Statement.
- The level of continuous improvement processes including training, knowledge sharing, consultations (including with key stakeholders, peer organisations and industry associations) and development of continuous improvement plans.

Following the review, the following positive observations were made about the Company's approach to modern slavery risk management:

- Consideration of modern slavery risks has been reflected in key policies and documents such as the Goods and Services Contract, Supplier Application Form, Supplier Code of Conduct etc.
- The Head of Procurement demonstrated good awareness of the Act and exhibited a strong commitment to continue to enhance and strengthen the Company's modern slavery program of work.
- Annual modern slavery training is provided to senior leaders, procurement staff and other staff identified with responsibilities for managing external supplier procurement. The training program has been developed in collaboration with an external compliance consultancy firm to ensure its effectiveness and aims to enhance staff members' understanding of the modern slavery legislation.
- A Supplier Survey conducted in 2021 received a high response rate (84%), with 101 out of 120 issued surveys responded to. This high response rate reflects the effectiveness of the process undertaken by the Head of Procurement and Category Managers to engage with key suppliers.
- The 2022 Modern Slavery Statement was well organised in its presentation and enabled easy navigation, clearly mapping out each section of the Statement against the relevant Modern Slavery Act requirement to demonstrate compliance.

Modern Slavery Statement 2023

Case study | External review of Viva Energy’s modern slavery program continued

While the review did not contain any high-risk findings, the review identified two main areas for improvement summarised in the table below:

#	Finding	Company response
1	<ul style="list-style-type: none"> Limited formal assessment of inherent modern slavery risk in Viva Energy’s operations. Approach to assess and manage modern slavery risks in the supply chain lacks formal assessment of inherent risks and tier 2 suppliers, as well as a formal risk validation process. 	<ul style="list-style-type: none"> The Company had modelled its work program around its prima facie high level assessment that its modern slavery risk is low given its presence virtually entirely in Australia, the difficulty in extracting, transporting and processing the kind of products it handles and the strict external regulatory conditions applying to much of its workforce and operations. The comparatively lower level of root cause risk analysis undertaken as a result forms the basis of this finding. During the 2023 year, there was a deeper analysis of the new risks associated with the expanding convenience business and increased construction activity which present an inherently higher risk from a modern slavery perspective and which involved a greater root cause modern slavery risk assessment.
2	<ul style="list-style-type: none"> Roles and responsibilities for the management of modern slavery risks is not formally documented and there is a lack of formal consultation process with internal stakeholders. Absence of a clearly defined work plan and process to assess effectiveness of modern slavery initiatives 	<p>During the year a Modern Slavery Committee with cross-functional representation from relevant departments across the Viva Energy group including Procurement, Legal, People & Culture, Sustainability and Finance was established. That Committee has clarified the:</p> <ul style="list-style-type: none"> Roles and responsibilities for the management and reporting of modern slavery risks for all stakeholders involved in the modern slavery program of work across the organisation. Processes and procedures for identifying, assessing, and addressing modern slavery risks to ensure compliance with legal requirements and alignment with industry best practices. Consultation process with internal and external stakeholders to assess modern slavery risks across Viva Energy’s owned and controlled entities. Annual work plan with clear timelines and activity breakdowns to support the delivery of modern slavery initiatives. Processes to report on progress and performance of initiatives committed within the Company’s Modern Slavery Statements and results of ongoing modern slavery risk management.

As a result of the review and the actions taken by the Company in response, Viva Energy considers that its approach to modern slavery risk management is appropriate to manage the current and presently emerging risks it faces.



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6. Due diligence and risk management – 2023 outcomes

6.1 Review of direct operations

6.1.1 General operations

Viva Energy has an extensive payroll function dedicated to the provision of compliant and timely remuneration and payment processes in accordance with legislation and industrial instruments provided under Federal and State law, our individual contracts of employment and our policies and procedures.

Viva Energy's payroll processes are subject to review on a weekly basis and independent third party audits occur on a biannual or more frequent basis.

In order for Viva Energy's payroll function to lawfully and accurately compensate and support its team members, it has in place various operational, and other systems and processes designed to capture and manage team member time and output, including rostering or resource allocation systems and time-keeping systems. Similarly, Viva Energy ensures that there is regular and systematic training (and re-training) of team members and managers to ensure sound decision-making and execution of time-keeping, rostering, leave management, allowance and expense approval, and other processes supporting team member's remuneration and benefits.

Viva Energy ensures key team members in its Safety, Health, People & Culture and Legal divisions maintain up to date knowledge of employment and industrial laws relating to working hours and fatigue management. This knowledge is then applied to monitor, assess and promote team member health and safety in compliance with legislation and best industry practice. Viva Energy's robust Health, Safety, Security and Environment Policy provides further support and monitoring of its operational risks.

Before commencement of a team member's employment, a comprehensive right to work check is completed, inclusive of regular Visa Entitlement Verification Online (VEVO) system checks for all relevant team members.

During the on boarding process all team members are provided with:

- Fair Work Information Statement, with team members employed on a casual basis additionally being provided with the Casual Employment Information Statement (CEIS) outlining the information about their conditions of employment and their rights, along with copies of relevant policies and procedures, including at a minimum:
 - Business Principles and Code of Conduct
 - Guide to Standards of Behaviour
 - Competition and Consumer Act Guidelines
 - Securities Trading Policy
 - Disclosure Policy
 - Anti-bribery and Corruption Policy
 - Whistle-blower Policy

In addition to the Company's expectations of employees, these policies provide information regarding a number of support mechanisms in place for team members who require assistance, including:

- Viva Energy Australia Grievance Policy
- Confidential 24/7 Stop Line
- Confidential 24/7 Respect@Viva Line
- Confidential 24/7 EAP services
- People Queries inbox monitored during business hours
- Access to assigned members of the People & Culture team during business hours

6.1.2 Convenience & Mobility operations

Although the Company's assessment is that there is a low level of risk exposure due to the localisation of the Company's operations and the robust approach we take to managing employment conditions, taking operational control of the convenience segment of the Convenience & Mobility business in 2023 has necessitated the Company to undertake further analysis in this area.

Through the acquisition of the Coles Express business, Viva Energy reviewed the terms on which existing and new team members were to be employed. Through that process, Viva Energy identified that the acquired Coles Express workforce was primarily employed through a combination of common law and casual contracts, and Enterprise Agreements.

In order to remain compliant with relevant legislation and industrial instruments, moving forward new team members in the Convenience & Mobility business are engaged through appropriate arrangements with Viva Energy.

6.2 Review of supply chains

6.2.1 General supplier compliance

Viva Energy promotes the importance of addressing modern slavery risks by embedding modern slavery due diligence as a key part of its procurement process.

The Company has a comprehensive supplier due diligence program to assess and evaluate new and existing suppliers. This program ensures that the suppliers that Viva Energy chooses to work with meet specific criteria, standards and compliance requirements. By doing so we aim to mitigate risks associated with the supply chain, enhance transparency and engage suppliers who are reliable and ethical. This ensures that when making any purchasing decisions, ethical sourcing and modern slavery is assessed and included as one of the key selection criterion.

Modern Slavery Statement 2023

The supplier due diligence program at Viva Energy is multilayered with suppliers being assessed throughout the whole contract lifecycle. This stretches from:

1. preliminary assessments on prospective suppliers.
2. assessing during onboarding and contracting.
3. ongoing monitoring of our contracted suppliers.

A summary of that process has been outlined in detail below.

Procurement stage	General	Steps taken to assess and address supplier risks
Prospective suppliers and market engagement	Suppliers invited to participate in a tender are asked to respond to a series of due diligence questions and confirm their compliance with contractual obligations which includes Viva Energy's Supplier Code of Conduct (SCoC) which includes compliance with the Act. The tender responses are assessed, evaluated and where required, clarification discussion and negotiations are conducted. This process is governed by Viva Energy's internal Procurement Policy, which references the importance of ethical considerations in procurement decisions.	<ul style="list-style-type: none"> • Desktop research into where suppliers are located, the products and services being offered, their labour profile (whether temporary, migrant workers are used), level of sub-contracting, origins of raw materials and existence and depth of Ethical Sourcing Policies and Modern Slavery Statements. • Assess supplier willingness and transparency to provide the above polices and general information in relation to modern slavery risks. • Include all company polices and expectations regarding modern slavery in Request for Proposals (RFP), including our SCoC and Agreement templates, which contain further obligations in regards to modern slavery. • Request suppliers to complete a pre-qualification survey which covers topics such as: labour profile, recruitment practices, raw materials, supply chain, sub-contracting, company policies and procedures and applicable accreditations. • If applicable, request results for any audits that have been conducted on the supplier's business and sites. • In the event where there is inherently heightened modern slavery risk, we may decide to audit our prospective suppliers. Depending on the complexity and geographic location of our supplier, we may engage an accredited third-party to assist in our audit program. If we decide to audit, it can be completed via documentation/system reviews, site tours and employee interviews.



Modern Slavery Statement 2023

Procurement stage	General	Steps taken to assess and address supplier risks
Onboarding and contracting new suppliers	<p>Suppliers to the Company are invited to register their business details in the Viva Energy Supplier Registration portal. Part of the registration process includes the requirement for suppliers to review and accept Viva Energy's Governing Conditions, which includes compliance with the SCoC, the Act and other relevant laws and regulations as well as the Company's Code of Conduct.</p> <p>The Viva Energy SCoC incorporates our principles and approach to diversity, inclusion and human rights. It formalises the Company's requirements with our suppliers and outlines Viva Energy's zero tolerance of modern slavery practices.</p> <p>The Company's Code of Conduct refers to the requirement to respect the fundamental human rights of our employees and those we work with. This encapsulates modern slavery.</p>	<ul style="list-style-type: none"> • Request copies of all applicable documentation, including any suppliers' policies and codes of conduct and information that has previously been viewed. • Insert all Viva Energy policies and clauses into our Agreements, including Viva Energy's SCoC, clauses relating to workforce standards and the requirement to hold any applicable insurances. • All Agreements outline a remediation process when/if a material breach occurs in relation to our ethical sourcing expectations and a timeline of closing the remediation. • Our standard Agreements outline our right to audit to verify compliance with modern slavery requirements
Monitoring contracted suppliers	<p>Once a contract is executed and implemented, Supplier is monitored against contractual requirements and assessed through regular communications and business reviews. We work closely with our suppliers to foster a positive relationship, promoting ethical behaviours and transparency. We conduct supplier site visits to view the operations and speak to staff directly where necessary.</p> <p>Through category management, the Company also ensures we stay up to date with external and industry information. Awareness of industry specific risks and challenges allows us to proactively manage risks within our supply chain.</p> <p>While no instances of modern slavery breaches have been identified to date, in the event a modern slavery breach was identified, the Company would work with the supplier to eradicate the contravening practices consistent with our zero tolerance approach. However if those steps failed and modern slavery risks continued to be apparent in the supplier's operations, the Company would consider other appropriate steps including ceasing doing business with the offending supplier.</p>	<ul style="list-style-type: none"> • Develop and maintain a thorough understanding of our suppliers' supply chains, manufacturing and processing practices. • Performance management of suppliers with ethical sourcing being an indicator. • Ongoing monitoring of supplier practices through: reviewing changes in their supply chains and ensuring ethical sourcing is discussed in quarterly business reviews • If audits are necessary – ensure there is a cadence of audits scheduled and a program of remediation is developed (if required) • Keep up to date with external and industry information to ensure we are running a best-in-class approach to ethical sourcing risk mitigation and communicating this with our suppliers

We acknowledge that our modern slavery risks change overtime and our approach to how we assess and manage risk is something that needs to change as well, as what is fit for purpose today, may not be applicable in the future. Therefore, our approach is always evolving and reviewed regularly to ensure it remains relevant.

Modern Slavery Statement 2023

6.2.2 Convenience & Mobility supply chain

With the acquisition of Coles Express in May 2023, the Company took control of new supply chains inherited from the Coles group. As a result, it has been important for Viva Energy to thoroughly understand these supply chains and build the Company's new modern slavery risk profile, understanding that we are now exposed to greater levels of inherent risk by procuring a new portfolio of goods and services that we sell to our customers or use to run our day-to-day operations. Post-acquisition, our supply chain has become more complex, more fragmented and more global.

Our assessment of these new risks was achieved through a combination of partnering with Coles as well as conducting our own due diligence.

Review of Coles' modern slavery approach – We connected with Coles' Ethical Sourcing team to gain an understanding on how they approached modern slavery and whether there were any gaps that we needed to address. We reviewed Coles' Modern Slavery Statement, which gave clear indication of how

they identify, manage and mitigate their risks. After reviewing Coles' approach we concluded that Coles have a market-leading approach to modern slavery with no evident gaps in how they approach risk assessment and risk management with the transitioned Coles Express suppliers.

Viva Energy due-diligence – In addition to partnering with Coles we have also conducted our own research into understanding our new supply chain. This involved creating a risk profile for every new supplier, which was based on: details of what they supply, key contract terms, levels of sub-contracting, workforce standards, communication of modern slavery obligations, communication of the SCoC, where they're located, what desktop assessments have been performed, what pre-qualification questionnaires have been completed and whether any audits have been performed. Once we sought all this information, we segmented our supplier-base into appropriate risk segments, targeting the highest priority suppliers in the first instance. Through this process we have been able to confirm that no material gaps exist.

Case study | Navigating modern slavery risks in our pursuit for Net Zero

As part of Viva Energy's Net Zero targets by 2030 commitment, we are rolling out a program to install solar panels on the roofs of 450 Coles Express sites over the next 3 years. The project would involve running a tender to contract Engineering, Procurement and Construction (EPC) suppliers to source and install the solar panels.

Prior to commencing the tender, we acknowledged that there are some significant human rights risks when procuring solar panels and other renewable energy products. Much of the global supply of solar-grade polysilicon is sourced from the Xinjiang region in North-West China, which has reported to be home to serious human rights violations, including child and forced labour.

Understanding these risks prior to running the tender allowed us to be more proactive in our engagement with potential suppliers, providing an opportunity to pre-prepare adequate documentation and allocating time to create more options to mitigate risk. For example, we ensured we vetted all suppliers prior to participating in the tender and only invited suppliers who outlined their approach to reducing modern slavery risks.

We were also able to review scenarios of sourcing the solar panels ourselves from manufacturers which would give us greater control and visibility. We underwent significant due diligence into the solar panel and inverter market to understand: what suppliers and manufacturers were in the market, where the equipment was manufactured, where the raw materials were sourced, where the equipment was stored and the make-up of the logistics network.

After thorough assessment of all options, we elected to nominate the suppliers of solar panels and inverters that we wanted the EPC supplier to use. We asked that any submissions must include using the equipment we had nominated, as the nominated equipment suppliers represented a lower level of modern slavery risk. The nominated equipment suppliers had transparent operations, the appropriate accreditations, self-assessment survey results, audit results, were willing to be audited and were committed to abiding by our policies regarding modern slavery.



Modern Slavery Statement 2023

6.2.3 Construction works supply chain

During 2023, we focused on the risks associated with the material construction work the Company is undertaking in progressing the building of additional diesel storage capacity and the work on upgrades to the Geelong Refinery to produce Ultra-Low

Case study | Monitoring offshore construction activity

Viva Energy has contracted with an overseas supplier based in Bangkok, Thailand that is contracted to provide module fabrication and assembly services to Viva Energy's ULSG project (Thailand Contractor).

Project modern slavery scope

Prior to contracting with Thailand Contractor, the procurement tendering process ensured the supplier had a human rights commitment which included managing modern slavery risks. The key modern slavery risks to be reviewed were:

1. Unsafe conditions
2. Forced or exploitative work practices
3. Passport confiscation
4. Bonded and child labour

To ensure compliance to this commitment, the procurement team included a contractual right within the services agreement to audit the supplier and its supply chain during the course of the execution of the contracted services for the project.

The scope for monitoring modern slavery risks for this project would involve site observations by project team members at Thailand Contractor's fabrication facilities on location in Thailand and the assembly yard located at the Thailand based port and in-person discussions with the supplier's procurement and human resources teams regarding how labour practices and policies will be performed.

Compliance monitoring and due diligence in 2023

In August 2023, an initial supplier meeting with the Thailand Contractor project team was held.

The main purpose for this initial discussion was to understand and see first-hand the supplier's embedded process to support their commitment to modern slavery and document how this is managed within their daily internal operations and communication with their supply chain partners.

The initial in-person supplier meeting in Thailand was attended by Viva Energy's procurement representative from the refinery and three supplier representatives being the Thailand Contractor Project Manager, Procurement Manager and Contracts Manager. A key finding from the meeting was that Thailand Contractor is well aware of their modern slavery commitment and have taken steps to ensure compliance with modern slavery requirements within their subcontractor agreements.

We obtained further details that provided assurance that modern slavery compliance was an important aspect of Thailand Contractor's engagement:

- **Training programs:** Thailand Contractor employees have a mandatory requirement to complete a training module on forced labour training as part of their corporate training requirements. We were advised that this training took place throughout 2023.
- **Due diligence on suppliers – incorporation of obligation of human rights clauses into all subcontracts:** Thailand Contractor was transparent and presented the Viva Energy representative with their unpriced agreements with subcontractors highlighting the relevant clauses requiring subcontractors to adhere to human rights and lawful employment practices.
- **Supply chain mapping – identifying lower tier subcontractors:** The Thailand Contractor representatives provided further clarity to Viva Energy of the Tier 2 supply chain partners who are assisting Thailand Contractor in delivering the project. The two key areas of focus in relation to modern slavery risks review during the project execution phase are:
 1. **Labour hire:** Thailand contractor will be utilising two labour hire companies – we have the names of those Thailand based subcontractors who are hiring engineering and construction staff to support the delivery of their scope of work for the project.
 2. **Piping fabricator:** we have the names of the Thailand based subcontractor performing piping fabrication for the project.

The transparency of Thailand Contractor's approach provided a high level of confidence that modern slavery risks are being mitigated. This will be further assessed with peak construction activity taking place through 2024 on the ULSG project.



Modern Slavery Statement 2023

Sulphur Gasoline (ULSG). A case study detailing the modern slavery risk mitigation steps taken has been set out below.

6.2.4 Shipping

A detailed case study was included with respect to the approach adopted by Viva Energy to its fuel shipping requirements in Viva Energy's 2021 and 2022 Statements.

Consistent with the position in those years, most of Viva Energy's fuel shipping requirements are co-ordinated through vessels chartered by the Vitol group. Viva Energy has a long term relationship with Vitol as its supplier of crude oil, refined products and vessel chartering services, and Vitol is also a key shareholder in Viva Energy.

As set out in Vitol's 2022 Environmental, Social and Governance Report published on 30 March 2023, which is consistent with Viva Energy's own due diligence work with Vitol, Vitol has a robust modern slavery approach including:

- Screening of counterparties by use of international databases and internet searches, to identify whether any ESG shortcomings, e.g. child labour risks, are present.
- Know Your Customer (KYC) occurs before Vitol enters into business relationships and their Environmental & Social (E&S) department may require additional

controls, e.g. completion of questionnaires, insertion of E&S clauses, carrying out third-party audits, or other relevant certifications.

- The compliance team periodically monitors approved counterparties for potential issues and escalates relevant cases to the E&S department.
- Human rights reviews (HRRs) and human rights impact assessments (HRIAs) occur where Vitol anticipate the presence of salient human rights issues.

Viva Energy's previous Case Studies referenced the work undertaken by Vitol in managing the welfare of seafarers. Since that time, Vitol has continued to undertake and publish further detail describing its work in identifying and addressing human rights issues across its shipping activities in its Environmental, Social and Governance Report for 2022. The analysis was very extensive and key extracts of their work are set out in the case study below which has been extracted from pages 60-61 of Vitol's 2022 Environmental, Social and Governance Report.

Case study | Vitol's work in identifying and addressing salient issues across its shipping activities

Protecting seafarers' rights

Shipping is a priority area in Vitol's human rights strategy, as potential adverse impacts on seafarers can be severe and are likely to occur if appropriate mitigation measures are not in place. Scenarios that increase the risk of adverse impacts to seafarers include:

- Working under temporary contracts
- Recruitment by third party crewing firms (and sub-agent structures)
- Operating in high-risk and isolated work environments
- Inability to leave their work environment

We undertook human rights impact assessments (HRIAs) on the barges and vessels we own to investigate actual and potential human rights impacts, ascertain whether our procedures are sufficiently robust to prevent and mitigate adverse impacts and understand how we can improve our due diligence procedures by engaging extensively with seafarers.

In 2021, we piloted our first HRIA in shipping with LSC, Vitol's technical manager. In 2022, we undertook HRIAs in V-Bunkers (owner, manager and operator of barges) in Singapore and the United Arab Emirates (UAE). The HRIAs with V-Bunkers included two steps:

- Completion of a third party managed, multilingual online, telephone and anonymous worker survey. 70% of the seafarers at sea at that time completed the questionnaire
- Interviews with seafarers on barges. 20% and 80% of the seafarers working on V-Bunkers barges at that time were interviewed in Singapore and UAE respectively

Seafarers were asked to prioritise the issues they raised. The results led to the following priority areas for continued improvement:

- Expanding regular communication between office staff and seagoing personnel to strengthen relationships and to build trust, including confidence to raise grievances. The crewing department revised how it reviews crew terms and conditions during the onboarding safety briefing, and encourages crew members to raise human rights and safety issues during their service period

Modern Slavery Statement 2023

Case study | Vitol's work in identifying and addressing salient issues across its shipping activities continued

- Phasing out third-party crewing services and strengthening due diligence in the recruitment process e.g. to prevent recruitment fee payments and to ensure just and favourable working conditions
- Avoiding long, continuous services onboard to mitigate the risk of fatigue and promote mental wellbeing. As with many other shipping companies, V-Bunkers crew changes were heavily impacted by the pandemic. V-Bunkers crewing department made great efforts to contravene long continuous service onboard due to Covid-19 and the situation has improved further, helped by the relaxation of port authority rules
- Boosting communication technologies to ensure daily contact of seafarers with family members and other stakeholders. V-Bunkers set the target to strengthen Wi-Fi connectivity for all barges by 2024. The enhancements will be gradually implemented during vessel surveys, dockings or during earlier repair periods

To monitor the effectiveness of our measures we will undertake a follow-up online, telephone, and anonymous worker survey in 2023. We also developed KPIs to monitor those areas considered most important to seafarers.

LSC Seafarer Happiness Index

The Seafarers Happiness Index (SHI) benchmarks seafarer satisfaction levels with life at sea and against peers. This anonymous survey covers a range of topics including mental health, wellbeing, working life and family contact, and is one tool LSC uses to measure satisfaction.

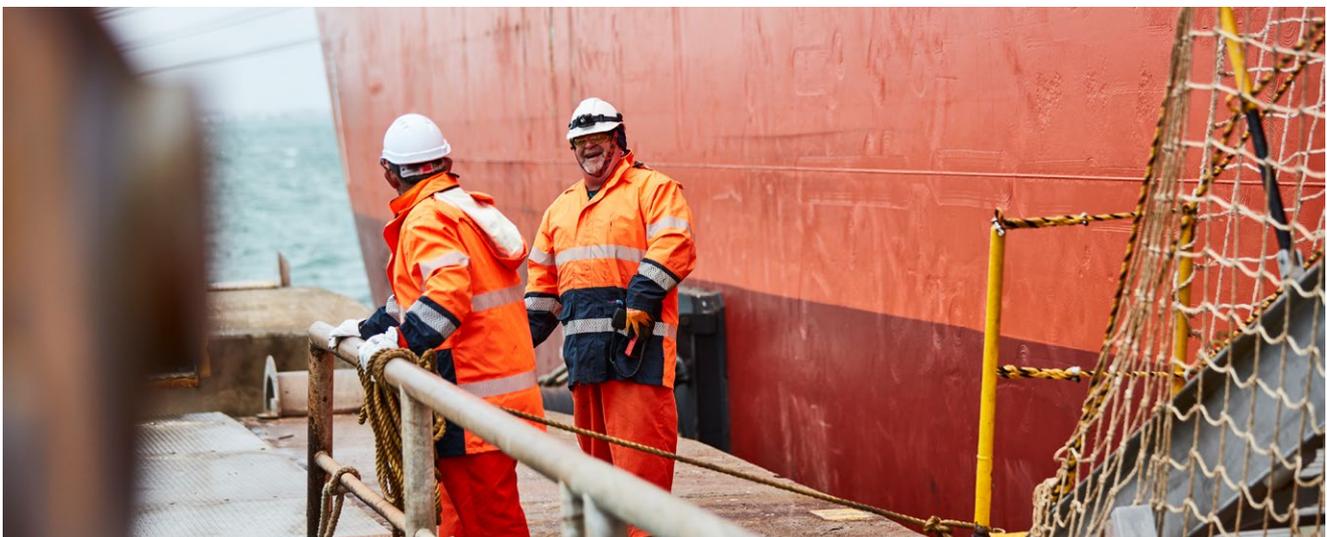
The survey was completed by 415 seafarers. The average LSC score improved compared to last year and is 5% above the industry average. The higher scores related to seafarers' satisfaction in relation to: overall happiness

at sea, contact with family, ability to keep fit and healthy on board, and interaction with other crew members. The latter improved score is in-part likely due to LSC increasing the internet speed on its vessels and providing new professional gym equipment.

The only indicator that did not improve compared with last year was in relation to food on board. LSC has been addressing this since 2021, when cooks were trained to improve meal diversity, and to meet seafarers' food preferences and food allowances per vessel were increased by 10%. For 2022, LSC rolled out further training to kitchen staff and cooks. It is likely that higher inflation rates impacted the ability to buy high quality food which led to decreased levels of satisfaction. To address the issue in 2023, LSC will increase the daily budget per person for seafarers and doubled the increase rate for seafarers who work in Brazilian waters since inflation rates have been especially high.

Industry average happiness performance is higher than LSC's in the area of wages, food, training received, and workload. To improve performance in these areas, LSC plans to increase the salary of junior officers and ratings, to migrate the learning materials online and conduct hybrid seminars with playback capability. Crew cabin and accommodation space upgrades were agreed in 2022 to improve seafarer wellbeing at sea. The initial refurbishments will be delivered in the second half of 2023.

Seafarers are still feeling the effects of Covid-19. For instance, seafarers face different port restrictions that can include limited or no shore leave. This continued to impact the repatriation of seafarers in the South East Asia and China regions in a timely manner, through 2022, but cases have decreased compared with last year. LSC management is now able to better anticipate Covid-19 related challenges than during the initial outbreak.



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On top of the significant work undertaken by Vitol in this space, the vessels and crew all continue to be individually vetted by Viva Energy. This is also the case for vessels used by Viva Energy, which are not co-ordinated by Vitol.

Throughout the vetting process, proposed vessels are scrutinised against a stringent set of requirements for suitability and acceptance, including considerations for crew management and welfare. The Company's vetting process in 2023 remained consistent with prior years except for:

- The abandonment of requirements for Covid testing on board the ship and quarantine of all ships in WA. This practice was consistent with the changed industry approach to Covid, and
- Changes to the maximum continuous period that a seafarer should serve on board a vessel without leave reverted to 11 months as opposed to the 13 months during Covid.

The applicable checks which Viva Energy undertakes are summarised in the table below:

Checks	Description
 Sanctions	Both the vessel operator and owner are screened for any existing or historical sanctions.
 Labour convention	The vessel must hold a current Maritime Labour Convention (MLC) certificate, International Transport Workers' Federation (ITF) agreement or equivalent to get comfort that living conditions, employment and salary of seafarers meet required standards.
 Crew tenure	The vessel must meet Australian Maritime Safety Authority (AMSA) requirements for tenure, ie maximum continuous period a seafarer can serve on board a vessel without taking leave.
 OCIMF inspection reports	The Ship Inspection Report Programme (SIRE) database held by Oil Companies International Marine Forum (OCIMF) is reviewed for each vessel to understand safety measures on board, crew manning/tenure and state of accommodation and living areas on vessels.
 PSC inspections	Port State Control (PSC) inspection reports for the prior 12 months are reviewed for each vessel to determine whether the vessel has been detained in an Australian port as a result of issues including unsatisfactory crew conditions.

Every year, hundreds of vessels go through Viva Energy's vetting process as part of supplying fuel to Australia and a number of vessels are rejected. During 2023, Viva Energy vetted 750 vessels and 14 were rejected for failing to successfully clear the Viva Energy maritime vetting process for a range of technical and operability reasons. None of these rejections were on the basis of failing to meet crew welfare standards or modern slavery concerns.

As a result of the further extensive work undertaken with respect to shipping activities during the 2023 year, it is Viva Energy's view that the risk of modern slavery in those operations is low despite the higher inherent risk in that category of operations.

As a large and inherently riskier component of our operations, this position will continue to be closely monitored during the next phase of our modern slavery analysis to assess whether there is any basis for movement in that risk assurance conclusion.

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6.2.5 Changes to operations – Viva Energy Advanced Polymers acquisition, Skyfuel and Duff

In 2023, Viva Energy completed a number of 100% share acquisitions:

- On 1 March 2023, the acquisition of both John Duff & Co Pty Ltd and John Duff & Co (Transport) Pty Ltd, a wholesale fuel distributor and cartage business which commenced operations in the 1950's and services customers throughout Gippsland, Victoria,
- On 28 April 2023, the acquisition of Skyfuel Australia Pty Ltd (Skyfuel), an aviation fuel distributor with a presence at a number of rural airfields in New South Wales, Victoria and Western Australia.
- On 14 September 2023, the acquisition of LyondellBasell Advanced Polyolefins Pty Ltd (LAPA), now named Viva Energy Advanced Polymers Pty Ltd, a polypropylene manufacturer which was previously part of the broader LyondellBasell Group along with LyondellBasell Australia Pty Ltd (LBA) before LBA was purchased by the Company in 2022.

The acquired entities introduced a collective of approximately 72 people to Viva Energy's workforce, all of whom are based in Australia.

Each of the acquired entities were not subject to the Act before acquisition by Viva Energy and remain as non-reporting entities after their acquisition.

Consistent with our approach to providing targeted training for the broader business, appropriate staff working within these new businesses have been included and completed the group modern slavery training program.

6.3 Culture of modern slavery understanding

6.3.1 Reviewing and improving policies

Viva Energy has in place a number of Policies which align with its commitments with respect to modern slavery:

- Every member of Viva Energy's workforce is required to comply with Viva Energy's Code of Conduct, which confirms our aim to conduct business in a way that supports fundamental human rights.
- Our Human Rights Policy seeks alignment with respect to our modern slavery commitments by Viva Energy's employees and contractors, along with suppliers, customers, business partners and the communities in which Viva Energy operates.
- Viva Energy's SCoC sets out our expectations of suppliers with whom we do business stating that Viva Energy's suppliers have a responsibility to:
 - Ensure that they comply with all relevant laws and regulations relating to labour and human rights, including modern slavery.
 - Have in place procedures to identify, investigate and take action in relation to any occurrence of modern slavery.

All of the above policies can be found at <https://www.vivaenergy.com.au/our-company/corporate-governance>.

As set out in greater detail in section 5.2 of this Joint Statement, during the year Viva Energy established a Modern Slavery Committee to enable the Company to better share insights, discuss challenges, and align efforts in addressing modern slavery risks.

Viva Energy also collaborates with industry bodies, industry peers, and attends third-party events focusing on ESG related matters, including ethical sourcing. During 2023, Company representatives attended: PASA procurement events on ESG, Procurement Australia sustainability forum and engaged with SEDEX to become part of their community.



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6.3.2 Customer surveys

As a supplier of fuels to some of Australia's largest companies through the Company's Commercial & Industrial business which supplies companies in the resources, aviation, mining, road transport and bitumen sectors, Viva Energy is subject to regular review by those customers as part of their own modern slavery due diligence.

During 2023, the Company completed 18 detailed assessments of its modern slavery risk practices for some of Australia's largest companies. None of those assessments involved findings of modern slavery risks which needed to be pursued further.

This continuous cycle of assessment through our customers provides both a real time ongoing assessment of the Company's risks, while allowing us to better understand modern slavery due diligence practices and hence refine our own practices to maintain continually improving standards.

Viva Energy continues to review how we can improve our company-wide approach to mitigating modern slavery risks.

6.3.3 Improving staff awareness

Viva Energy is committed to ensuring that all appropriate staff within its operations that have a connection with people or procurement activities understand modern slavery and are equipped to assess modern slavery risks.

In that regard, in 2023 Viva Energy continued the rollout of its compulsory modern slavery training program for all senior leaders and staff with responsibility for managing external supplier procurement. All new hires during 2023 with responsibilities in these areas were required to undertake the training, which included relevant employees within the newly acquired Convenience business.

The training program provides a general background to the modern slavery legislation and Viva Energy's responsibilities under the Act. Importantly, the program provides practical tips on how to recognise practices that may constitute modern slavery, including key factors that increase the risk of modern slavery.

To maintain optimal effectiveness of the program, it has been updated to provide further clarification of our responsibilities under law, additional guidance of higher risk sectors, products and geographies, and updated information about the current Commonwealth Government review into the Act.

The training has been undertaken by 372 employees. This is a significant increase from the 191 who had completed the training as disclosed in the 2022 Statement with training completed by 114 new Convenience & Mobility team members. The Company considers that this provides strong coverage for those workers who may be exposed to modern slavery compliance risks in their day-to-day operations.

This targeted training is in addition to the broader training undertaken by all employees and contractors of Viva Energy, who must confirm their understanding of the Code of Conduct and complete mandatory training on anti-bribery and anti-corruption, equal employment opportunity and workplace health and safety at least once every two years.

Going forward, we will continue to provide training and other forms of communication which aim to strengthen the ability across the Viva Energy to identify any risks of modern slavery practices.



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7. Assessing effectiveness and looking forward

7.1 Looking forward

Based on the work undertaken by the Company up to 2023, Viva Energy has been able to obtain confidence that its modern slavery risk is low.

While this is a welcome conclusion, given that the business and its supply chains continue to evolve, the Company is aware that it will need to continue to revise the scope of work it undertakes in this area.

Viva Energy’s overall approach to managing modern slavery risks across its operations and supply chains has been set out in section 5 of this Joint Statement. Based on that approach, set out below are the 2024 focus areas for the Company’s modern slavery risk assessment and due diligence work.

7.2 2024 Focus areas

In 2024, Viva Energy’s focus will be in the following areas:

Focus area	Key actions	
Review of operations and supply chains – expanding convenience business	<p>Consistent with the Coles Express acquisition in May 2023, Viva Energy’s Convenience & Mobility business will continue to evolve with the acquisition of the OTR Group business.</p> <p>Like the Coles Express business, the OTR business will bring about the procurement of a range of new goods and services, and the ownership of a new supply chain which we will need to understand to assess its risks of modern slavery.</p>	
Review of operations and supply chains – construction activity	<p>Building on the work in 2023, a large portion of construction activities will commence in 2024 at the Thailand Contractor fabrication and assembly yard facilities. As a result, Viva Energy plans to send project representatives on a periodic basis to witness and inspect progress works at the Thailand facility, along with performing due diligence by engaging with the Thailand Contractor project team members to review labour policies and monitor lower tier subcontractor activities.</p>	
Building culture and awareness	<p>Continuing to develop Viva Energy’s internal capability to identify modern slavery risks including the taking of further steps to ensure broader awareness and understanding of risks across Viva Energy.</p>	

7.3 Assessing effectiveness

Viva Energy will assess the effectiveness of our modern slavery risk management program on a regular basis by using the following performance indicators throughout 2024.

Focus area	Measure
Review of operations and supply chains – expanding convenience business	Conclusion of risk assessment for goods acquired for Viva’s convenience business and movement into a monitor and maintain phase.
Review of operations and supply chains – construction activity	Conclusion of risk assessment for construction services and movement into a monitor and maintain phase.
Building culture and awareness	Continuing to develop Viva Energy’s internal capability to identify modern slavery risks.

Approval

This Joint Statement was approved by the Board of Viva Energy Group Limited on its own behalf and on behalf of its wholly owned subsidiaries following review by the directors on 28 March 2024.

