

Modern slavery statement 2020

1. Introduction

This inaugural statement, compiled under the *Modern Slavery Act 2018 (Cth)*, outlines the actions being taken by Liberty (comprising the companies listed below) to assess and address modern slavery risks in internal operations and external supply chains, and forms part of a program of commitment to further engagement and development over time.

While Liberty is at the end of most of its supply chains, and is a price taker as opposed to market influencer in most of its relationships, all entities have a role to play in protecting human rights. Taking measures to assess, address, report and engage on these matters leads to greater awareness, to action and ultimately to better outcomes.

2. Entity and ownership

This modern slavery statement covers the activities of the following companies (together, **Liberty**) for the period 1 January to 31 December 2020.

Liberty Global Pty Ltd ACN 637 527 541
Liberty Land Pty Ltd ACN 637 528 815
Liberty Property Pty Ltd ACN 637 528 520
Liberty Concepts Pty Ltd ACN 637 528 735
Liberty Oil Convenience Pty Ltd ACN 629 547 682
Liberty Fuel Pty Ltd ACN 629 546 149
Albany Retail Pty Ltd ACN 625 079 781

Liberty is owned equally by Viva Energy Australia Pty Ltd ACN 004 610 459 (**Viva Energy**) and New World Corporation Pty Ltd ACN 628 228 455. In turn, New World Corporation Pty Ltd is owned equally by the families of David Goldberger and David Wieland.

Viva Energy is one of Australia's leading energy companies. David Goldberger and David Wieland have had a significant presence in the downstream petroleum industry since the 1970s.

3. Operations

Liberty has operated since December 2019, but the retail business it acquired was established from 2014 by an entity with the same ultimate ownership.

As at the date of this statement, Liberty:

- leases and operates approximately 78 service stations (or unmanned retail outlets) in all states and territories of Australia except ACT and Tasmania;
- develops new service stations and upgrades existing service stations, and currently has major works underway at approximately 5 new sites, as well as some of the existing ones.

Liberty employs approximately 37 staff at head office and throughout the country. Liberty's service stations are operated by commission agents.

4. Risks of modern slavery practices

Liberty has assessed both its internal operations and supply chains to determine the risk of modern slavery practices being present.

Internal operations

Liberty does not employ any staff or workers outside Australia. It is committed to complying with Australian employment and safety laws, and takes steps to ensure compliance. Accordingly, Liberty considers the risk of modern slavery in its internal operations to be low.

Supply chains

The table on the next page outlines:

- the material categories of spending in Liberty's operations;
- the risk of modern slavery practices being present;
- specific steps taken, or being taken to address the risk.

Supply chain	Risk	Addressing risk
Fuel for resale	Fuel is entirely sourced from Viva Energy. Viva Energy has lodged a modern slavery statement for the year ended 31 December 2020. Certain risks in relation to the fuel supply chain are outlined, along with the measures that Viva Energy intends taking to address those risks.	None specific, other than review Viva Energy's 2021 statement when lodged.
Rent	All service stations are leased from Viva Energy. Given the sites are in Australia, this is a low risk area.	None specific.
Fuel commission agents	Liberty engages commission agents to sell fuel on its behalf. The agents are all located in Australia, so the risks of modern slavery are low. However, there is some risk present given each agent is a small business with no substantial accountability.	<ul style="list-style-type: none"> • Agents are contractually obliged to comply with employment and other workplace laws. • On appointment, agents are provided with information regarding employment laws and formally acknowledge that it is their responsibility. • Agents undergo annual employment compliance audits implemented independently by the industry association body, ACAPMA.
Construction and renovation	<p>Liberty engages a builder to construct and renovate the service stations. In turn, the builder engages employees and subcontractors, and acquires raw materials for building.</p> <p>The engagement of employees and subcontractors is low risk given they are located in Australia. Where the ultimate source of the raw materials is overseas, there is some risk present.</p>	<p>Require the builder to respond to a modern slavery questionnaire describing its modern slavery risks, and how it assesses and mitigates any risks.</p> <p>Assess the responses and determine whether further engagement is required.</p>
Acquisition and maintenance of service station equipment	<p>Liberty acquires service station equipment (such as fuel-system equipment, point-of-sale equipment, signage and store fit-out) and maintenance services for that equipment from Australian entities.</p> <p>Where the ultimate source of the raw materials is overseas, there is some risk present.</p>	<p>Require major suppliers to respond to a modern slavery questionnaire describing its modern slavery risks, and how it assesses and mitigates any risks.</p> <p>Assess the responses and determine whether further engagement is required.</p>

5. Assessing and addressing risk

Liberty has, as part of this first modern slavery statement reporting period, undertaken to educate itself and its decision makers about modern slavery, and to develop a plan for assessing risk now and into the future and building and developing the framework for addressing risks.

To date, Liberty has:

- educated itself, including researching the nature of modern slavery, understanding government guidance and engaging with the industry association;
- undertaken a risk assessment of internal operations;
- undertaken an initial risk assessment of supply chains, including steps currently being undertaken;
- commenced the process of engaging with significant suppliers (in potential risk areas).

As well as the specific steps outlined in the table on the previous page, Liberty plans to take the following more general steps.

Internal

- Communicate with staff including explaining the risks of modern slavery and the steps Liberty is taking, and distributing this statement.
- Include modern slavery considerations in safety and compliance meetings.
- Continue to engage with the industry association, ACAPMA, to understand areas of concern in the broader supply chain.
- Quarterly executive review of modern slavery risks in operations and supply chains, and the effectiveness of steps being taken to assess and address those risks.

Major suppliers

- Continuing to engage with existing major suppliers.
- Review the modern slavery statements of major suppliers as published.
- Engage with any new major suppliers before appointment.
- Including modern slavery considerations in major supply contracts.

6. Impact of Covid-19

In April 2020, the Australian Border Force issued an information notice asking businesses to consider the impacts of COVID-19 on modern slavery risk mitigation and in their modern slavery statement.

Generally, Liberty's operations and supply chains remained resilient during the reporting period. COVID-19 is not considered to have materially impacted the risks of modern slavery or Liberty's ability to assess and address those risks.

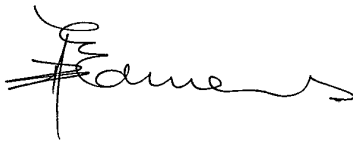
7. Consultation & approval

This statement was approved by the board of each of the Liberty companies on 31 May 2021.

Liberty has no other associated entities, so consultation on this statement was conducted internally.

8. General

This statement is the first for Liberty. It is recognised that this is a starting point for a broader engagement, assessment and communication program and that further steps will be required in the future. Liberty is committed to taking the steps required to do its part in combating modern slavery.

A handwritten signature in black ink, appearing to read 'Paul Edmonds', with a stylized flourish at the end.

Paul Edmonds
CEO

10 June 2021