

EG Australia

Modern Slavery Statement

1. Introduction

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (the **Act**). This Statement covers EG Group Australia Pty Ltd ACN 629 792 810 and its related bodies corporate including, EG Fuelco (Australia) Limited ACN 627 348 645 (together, **EG Australia, we or us**).

This Statement sets out:

- our structure, operations and supply chains;
- our policies which address the risks of modern slavery;
- the actions taken by us during the financial year ending 31 December 2023 to identify, address and minimise modern slavery risks in our operations and supply chains (including due diligence and remediation processes); and
- how we assess the effectiveness of these actions.

This Statement was approved by our Board of Directors on 29 April 2024 and signed by our Chief Executive Officer in accordance with the Act.

2. EG Australia structure, business, operations and supply chains

Our structure

The EG Australia companies are subsidiaries of EG Group Limited (**EG Group**), which is headquartered in Blackburn, United Kingdom. EG Group is a leading global independent convenience retailer with a diversified portfolio of over 6,000 sites across ten countries in North America, Europe and Australia, supported by over 47,000 employees globally.

EG Australia owns and operates 525 fuel and convenience sites, and currently employs more than 4,200 people nationwide.

Our operations

Our operations have remained materially the same as the previous financial year. We employ most of our team members directly and on permanent contracts. This reduces the risk of modern slavery within EG Australia's operations.

In our previous Statements we have recognised that there is a risk of modern slavery in areas of our business that use contracted or third party labour providers. Although we do not have direct control over the employment terms of these contracted parties, we strive to ensure that all of our contracted parties comply with current modern slavery laws. The standard terms in our vendor agreements require third party vendors to complete a modern slavery due diligence questionnaire, provide warranties that they are not aware of any modern slavery practices within their supply chain or operations, and promptly notify us if they become aware of any such modern slavery practices.

We have not been notified, or otherwise become aware, of any modern slavery practices in our supply chain, or the supply chains of any contracted vendors from the date of filing our first Statement.

Our Supply Chains

Our supply chain consists of trade suppliers and non-trade suppliers with the vast majority of our goods/services supplied by Australian businesses.

We have communicated our expectations to our trade suppliers, non-trade suppliers, partners and stakeholders to adhere to ethical business conduct consistent with our own. As stated in our previous Statement, we are committed to working with these parties to ensure their goods, materials and related supply chains are:

- fully compliant with all applicable labour laws and regulations, including the Act;
- transparent, accountable and auditable;
- free from ethical ambiguities;
- free from forced, compulsory or child labour; and
- free from discrimination in the workplace.

We communicate our expectations through a variety of channels, including supply or service agreements, tender and supplier due diligence documents and our Speak-Up policy and Code of Conduct available on our website.

Individuals with evidence of non-compliance within our supply chains are encouraged to follow the reporting procedure outlined in our Speak-Up Policy.

We continuously monitor our whistleblower platform for any reports of concerns or disclosure in relation to modern slavery. As at the date of this Statement, no such reports have been received in relation to the year ending 31 December 2023.

We will continue to ensure awareness and encourage our staff to use this channel of communication to report any unethical sourcing or modern slavery practices

Our Policies

Responsible Sourcing Policy

Our Responsible Sourcing Policy reflects our commitment to acting ethically and with integrity in all our business dealings and relationships and to take steps to ensure modern slavery does not take place in our business operations or supply chain. The policy outlines the steps EG Australia must take including undertaking due diligence to mitigate risks of modern slavery, inserting appropriate modern slavery clauses into supplier contracts and training employees involved in procurement and sourcing to understand the risks of modern slavery. Each member of our executive team monitors and evaluates the implementation and effectiveness of this policy with respect to their area of responsibility.

Code of Conduct

Under our Code of Conduct, we expect all team members to maintain high standards, and to speak up and provide feedback when they see activity or behaviour that they feel is wrong or does not match our ways of working.

Speak-Up Policy

Our Speak-Up Policy sets out the procedure for our staff to speak up confidentially to raise genuine concerns about misconduct in our business or operations without fear of reprisal, and includes an external reporting hotline for our staff and suppliers to use.

3. Identifying Risks of Modern Slavery Practices

We recognise that modern slavery practices are most prevalent where:

- service providers use unskilled or seasonal labour, or foreign or temporary workers;
- products are sourced from high-risk countries;
- there are poor governance structures within the organisation;
- there are poorly managed procurement or auditing processes; and
- there is a lack of awareness and training within the organisation.

We are constantly reviewing risks to prioritise our efforts where there is greatest risk to people in our operations and supply chain. Our risk assessment following consultation with internal stakeholders has provided a better understanding of the potential risks in EG Australia's business and the actions which have been implemented to address these risks. For example:

- some of the suppliers of goods for resale or use in our business in our extended supply chain fall within the potential risk area due to the nature of the goods or services being sourced (e.g. coffee or cleaning services) or the geographical locations from which certain goods or raw materials are sourced to manufacture such goods; and
- the prevalence of vulnerable workers or sub-contractors within the relevant sector (for example, in the construction and maintenance sectors).

We have assessed these suppliers to seek to identify any instances of modern slavery and are not aware of any such instances in our supply chain.

We intend to continue to assess and monitor suppliers that fall within the potential risk areas in our extended supply chain to ensure that there are no instances of modern slavery.

4. Actions Taken

We have taken the following actions, and continue to take these actions, to assess and address the risks of modern slavery practices in our operations and supply chain:

- Updated Standard Terms:* We have updated the standard terms in our vendor agreements to include a more detailed and comprehensive modern slavery clause which goes beyond an obligation to simply comply with applicable laws. In particular, our vendors are required to complete our modern slavery questionnaire and notify us if they become aware of or suspect any modern slavery practices within its supply chain or business operations. We also have

the right to audit vendors' operations, working conditions and procedures. We are also working to ensure this clause is included in all of our existing agreements and any third party contracts we enter into. This will give us greater visibility and control over modern slavery risks within our supply chain.

- B. *Standard ESG Questionnaire*: we have completed an ESG Questionnaire coordinated by EG Group which incorporates modern slavery due diligence questions. We completed this questionnaire for 2023 and provided supporting evidence and calculations to EG Group for all data included in our responses. The aim of this questionnaire is to monitor and ensure continued improvement in environmental, social and governance matters across the EG Group, including in relation to modern slavery.
- C. *Vendor Due Diligence*: We conducted vendor due diligence/integrity checks to identify any risks in the request for tender and procurement process and are working to ensure all vendors are subject to appropriate modern slavery due diligence during our vendor on-boarding or renewal process. We require our large suppliers to provide their own Modern Slavery Statements and policies for our review;
- D. *Compliance with our Responsible Sourcing Policy, Speak Up Policy and Code of Conduct*: Our Speak Up Policy and Code of Conduct are published on our website and our Responsible Sourcing Policy is made available to key personnel who are involved in procurement and sourcing. These policies reflect our commitment to act ethically and with integrity in all our business relationships. Most of our key suppliers have agreed to contractual terms which require them to comply with modern slavery laws and relevant obligations, including a provision allowing us to audit our business partners' operations, facilities and working conditions, procedures and systems to ensure compliance.
- E. *Employee Training*: Our key employees are required to complete detailed modern slavery online training. All of these employees have successfully completed training. We will continue to require staff to complete modern slavery training and monitor them in this regard.
- F. *Modern Slavery Questionnaire*: Most of our business partners and suppliers have completed self-assessment modern slavery due diligence questionnaire and/or warranted that they are not aware of any risks of modern slavery practices within their own supply chain or operations. Typically, we require this questionnaire to be completed either on the initial on-boarding of a supplier or on a renewal of their arrangements.

5. Commitment to Continuous Improvement

We consistently monitor and assess modern slavery risks in our business and by way of continuous improvement will strive towards:

- extending our modern slavery training to key employees and mandating completion;
- continuing to assess the potential modern slavery risks in our operations and supply chains with emphasis on high risk geographical locations and sectors;
- continuing to work with EG Group to complete our annual ESG Questionnaire which incorporates modern slavery due diligence questions;
- continuing to require new vendors to complete our modern slavery questionnaire and work towards having all existing vendors complete the questionnaire;
- ensuring all new vendors are subject to our new standard modern slavery contractual terms;
- continuing to transition existing suppliers upon renewal or amendment of their contracts to updated terms which incorporate our new standard modern slavery contractual terms;
- continuing to collaborate with suppliers to encourage sharing of information around modern slavery risks and ongoing communication and continuous improvement to achieve compliance if any breaches of this Statement are identified; and
- measuring effectiveness through performance monitoring.

6. Assessing Effectiveness

We regularly review the effectiveness of our management of modern slavery risk by:

- investigating and analysing complaints, reports and grievances made through our whistleblowing mechanisms;
- reporting on complaints, potential trends, and risk areas to the Speak-Up Committee and the Board;
- reporting on EG Australia's performance on Environmental, Social, and Governance (ESG) matters in connection with EG Group's ESG reporting and governance frameworks;
- reviewing and conducting training to maintain awareness within our organisation; and
- publicly communicating this Statement so our employees and suppliers have a clear understanding of our policies, expectations and future commitments to reduce the risks of modern slavery.

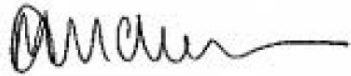
7. Process of consultation

This Statement reflects the position of EG Australia. All entities of EG Australia operate under a common set of policies and programs relating to modern slavery.

In implementing EG Australia's modern slavery compliance program, we have continued to consult with key stakeholders across the business. In addition, prior to approval by the Board, this Statement was reviewed by the executives of EG Australia who are responsible for the overall management of the EG Australia business.

8. Document control

Effective from:	30 June 2024
Date approved:	29 April 2024
Approved by:	EG Australia Board



Mike McMenemy
Chief Executive Officer
EG Australia