

Modern Slavery Statement - Australia

2024





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1. Introduction

This Modern Slavery Statement (Statement) is made by Impala Terminals Australia Pty Ltd in accordance with the Modern Slavery Act 2018 / Cth) (Act), for the group's financial year ended 31 December 2024.

Modern slavery is an umbrella term used to describe a range of serious exploitative practices, including servitude, forced labour, debt bondage and the worst forms of child labour. This statement describes the steps taken by the company to minimise the risk of modern slavery occurring in its business and supply chains. The company remains opposed to human trafficking and slavery both within their business and supply chains and fully support the objectives of the Act.

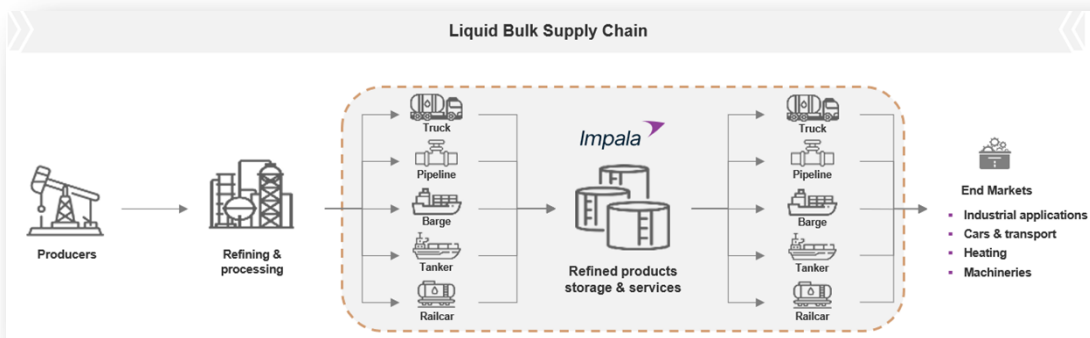
In this Statement, references to "we", "us", or "our" refer to the Reporting Entity.

2. The structure and operations of the reporting entity

Impala Terminals Australia Pty Ltd is part of Impala Terminals, a 50:50 joint venture between leading global supply chain and commodities company Trafigura and global institutional investor and asset manager IFM Investors.

Impala Terminals owns and operates a globally diversified portfolio of 30 strategically located storage infrastructure assets capturing long-term trade flows of essential commodities. We provide producers and consumers with reliable and efficient access to international markets. Our network of assets offers critical storage and logistics infrastructure solutions for energy and dry bulk customers worldwide.

Our refined products terminals are primarily located in emerging markets where we provide essential import infrastructure integral to national energy supplies. Our facilities play a key role in connecting imported products from global refining hubs via Impala port infrastructure to Impala storage terminals and subsequently to local downstream distribution networks by road or rail loading racks.



Impala Terminals Australia Pty Ltd is registered at 210, George Street, Level 8, Sydney, Australia, 2000, NSW, 2000, Australia and is a wholly owned subsidiary of Impala Infrastructure Switzerland SARL. The ultimate parent company is Impala Terminals Group SARL, incorporate in Luxembourg.

The liquid bulk terminal in Kwinana was opened in 2022, expanding the fuel import, storage and distribution capacity of Western Australia to create a more resilient energy market with direct berth access via the public berth.

The Kwinana terminal, located in Perth, with 220 million litres capacity and 16 tanks is uniquely positioned to serve Australia's growing oil product deficit driven by refinery closures, facing limited competition in the region. Gasoline, diesel and LPG are stored in the terminal, which has direct pipeline connection to the nearby Kwinana bulk jetty and directly employed 11 employees at the end of 2024.

Our website ([Homepage | Impala Terminals](#)) provides more detailed information about our business, including our strategy, philosophy and operations, as well as our approach to sustainability.



3. Modern slavery risks in operations and supply chains

Impala Terminals considers the risk of modern slavery practices in its own operations as low, given it employs largely a professional workforce. The company has implemented robust employment practices, including background checks, standardized employment contracts that normally exceed legal requirements. In each of the countries where we operate, we have a labour law firm that provides us with support during the hiring process, thus ensuring strict compliance with national regulation as a minimum. In addition, the company provides HS training periodically to ensure adequate and safe working conditions for employees.

All employees receive fair compensation above industry standards, with transparent payment systems that ensure workers retain full control over their earnings. Liquid terminals involve hazardous works (due to flammable liquids' use) which requires higher skills and education levels compared to other industries. Additionally, Australia has a strong framework for labour protection and regulatory oversight, further minimizing potential risks.

The turnover rate was zero for our entity in Australia, which represents a clear indicator of the company's good working conditions.

No related communications through our grievance mechanisms have been received so far.

Regarding risks in our supply chain, we understand that the main modern slavery related risks may come from direct materials and services sourced from emerging markets where there is a higher risk of modern slavery and/or human trafficking, and to a lesser extent from modern slavery context in our operation areas (where most of our suppliers are located). In order to cover this area, we have undertaken an initial assessment of modern slavery risk based on the countries where we operate and the product we import (considering both the products and the country of origin).

This assessment resulted in a low risk of modern slavery in our own operations or supply chain. We acknowledge that this does not necessarily mean that modern slavery was not present in our supply chain, and we are committed to working with our supply chain to ensure that together we can work to eliminate any form of forced, bonded or child labour.

Each of our suppliers has its own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights. We expect all suppliers and contractors to obey the national laws and international standards that require them to treat workers fairly, to provide a safe and healthy work environment and to protect environmental quality.

4. Actions to assess and address the risks

Our commitment

Upholding respect for human rights is integral to responsible business conduct. We recognise our potential to impact human rights through our activities and business relationships. We seek to avoid causing or contributing to adverse human rights impacts through our activities and to address such impacts when they occur.

We promote respect for internationally recognised human rights standards throughout our operations and our supply chain. We are committed to and support the principles of the United Nations Global Compact. We seek alignment with the International Bill of Human Rights, the ILO's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (UNGPs) and the Voluntary Principles on Security and Human Rights.

Aligning with best practices

Recognising the importance of sustainable practices and collaboration, in 2025 Impala Terminals became signatories to and participants in the UN Global Compact, the world's largest corporate sustainability initiative.

By joining, Impala Terminals commits to aligning its corporate actions with the Ten Principles of the Global Compact, as defined by the United Nations. These principles cover topics such as human rights, labour practices, environmental protection and anti-corruption. A fundamental responsibility within the UN Global Compact is to support and respect the protection of internationally proclaimed human rights, including freedom of association and the right to collective bargaining, the elimination of all forms of forced and compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment.

Governance and policies

We promote a strong compliance culture, one where all staff recognise their personal and collective compliance responsibilities. This is underpinned by our expected high standards of behaviour from all our people founded on honesty, integrity and respect.

These values are enshrined in our Code of Business Conduct (the Code) which is aligned with applicable laws and relevant international standards and reviewed and updated at least once a year. The Code is the foundation of our compliance programme,



supplemented by our compliance policies and procedures that provide direction on the correct approach to a variety of day-to-day situations that may be encountered whilst working for Impala Terminals. It is the responsibility of all employees to uphold the values and standards contained in the Code.

Given the evolving regulatory environment and our firm commitment to compliance, we place a high importance on employee communication, upskilling and training. All our workforce is required to complete training on the Code and the associated policies and procedures when joining the company and on a yearly basis afterwards.

Specifically for our workforce, we have implemented the following control processes:

- Pre-employment background checks, including age verification and an assessment of qualifications for the relevant tasks to ensure legal compliance.
- Human resource policies, procedures and processes are in place and designed to ensure that staff are remunerated in accordance with applicable laws and/or agreements and that they are working on their own free will, including their rights under the employment agreements.
- In each of the countries where we operate, we have a labour law firm that provides us with support during the hiring process, thus ensuring strict compliance with national regulation.

Counterparty Due Diligence

The Know Your Counterparty (KYC) onboarding and monitoring is a key process in the assessment of our counterparties. All new counterparties, including suppliers and customers, are required to go through pre-contract KYC checks and screening. Counterparties are also subject to ongoing monitoring and rescreening cycles for money laundering, sanctions, corruption and other related risk factors. As a global organisation the Company applies internationally recognised, industry standards to its anti-money laundering procedures as recommended by organisations such as the Financial Action Task Force ("FATF") and UK's Joint Money Laundering Steering Committee (JMLSG).

Any issues arising from the screening need to be addressed before the counterparty is able to do business with Impala Terminals. The system is regularly reviewed to reflect changes in the risk profile of our counterparties and regulatory requirements.

Grievance mechanisms

Employees and contractors can raise concerns through a number of channels, including through their immediate managers and to the Legal and Compliance or Human Resources teams. In addition, employees, contractors and other stakeholders are able to report anonymously through 'EthicsPoint', a 24-hour multilingual telephone 'hotline' and online reporting service provided by NAVEX Global, which we subscribe to via one of our shareholders, Trafigura.

Concerns received are assessed, addressed to the relevant department and, if appropriate, reported to the company Audit and Risk Committee. The relevant department is responsible for determining the appropriate response in each case, which may include an investigation or other resolution. In assessing the appropriate response, we seek to apply a proportionate and person-centred approach considering the needs of all participants.

We recognise the importance of effective grievance mechanisms for both internal and external stakeholders. This is critical to ensuring that we operate our business responsibly. Through our engagement at a local level, we collect any grievances from suppliers, contractors, local communities and other stakeholders, which we analyse and provide feedback on, including actions we are taking to mitigate any negative impacts.

By fostering a culture of trust, accountability, and respect, we empower employees to raise concerns without fear of retaliation. In 2024, we ran a campaign across our global workforce to encourage everyone to speak up and report any concerns or observations, in particular conditions or actions that have the potential to harm human health and wellbeing, impact our host communities or breach our standards and principles. We encourage our employees and external stakeholders to identify and report any concerns related to actual or perceived impacts.

To date, no cases of discrimination, child labour or forced labour in our workforce or supply chain have been reported.

5. Assessing the effectiveness of actions

The initial modern slavery risks assessment carried out for our operations in Australia indicated that we do not supply any goods, that have been identified by the US Department of Labor <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods> or the Global Slavery Index <https://www.globalslaveryindex.org/2018/findings/country-studies/australia/>, to be at higher risk of being produced by child or forced labour, reducing our risk.



Our Code of Business Conduct and other accompanying policies, and actions taken by the Company, such as employment clauses and background checks, further mitigate the risk. No related communications have been received so far through our grievance mechanism, which is available to suppliers, contractors, local communities and other stakeholders.

At Impala Terminals we remain committed to ensuring that we do business only in the right way, respecting all that work at or with us. We will continue to embed the principles through:

- Developing a Human Rights policy, covering specifically modern slavery.
- Provide specific awareness training to specific functions deemed at risk.
- Carry out additional monitoring to progressively extend the assessment of the company's supply chain and take actions to ensure zero tolerance in the supply chain

6. Approval

In preparing this Statement we have followed a cross-functional approach, and we have consulted with relevant functions and core departments (the reporting entity does not own or control other entities).

This statement has been approved by the Board of the reporting entity, pursuant to section 14 (2)(d)(i) of the Australian Act and signed (appropriate) by a Director of, or a person acting for and on behalf of the Reporting Entity.

On behalf of **Impala Terminals Australia Pty Ltd**

Name: Guillaume de Contenson

Title: Director

Date: 29 July 2025

