



**Convenience**

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## **JOINT MODERN SLAVERY STATEMENT 2021**

LOC Global Pty Ltd  
Liberty Oil Convenience Pty Ltd

# Joint Modern Slavery Statement 2021

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## 1 Introduction

This is Liberty's second modern slavery statement (**Statement**) prepared under the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**). It outlines the steps that Liberty (consisting of the entities set out below) has taken to identify and address modern slavery risks within its operations and supply chains. It also summarises how Liberty assesses the effectiveness of these actions and outlines the steps it proposes to take in future reporting periods to improve its response.

This Statement addresses each of the mandatory criteria for modern slavery under section 16 of the Act, as set out in the table in Annexure A.

## 2 Reporting Entities

This Statement is a joint modern slavery statement made under section 14 of the Act. It has been approved by the following entities, which are 'reporting entities' under the Act:

- LOC Global Pty Ltd ACN 637 527 541 (**LOC Global**); and
  - Liberty Oil Convenience Pty Ltd ACN 629 547 682 (**Liberty Oil Convenience**)
- (**Reporting Entities**).

This Statement covers the Reporting Entities and those entities that the Reporting Entities own or control (**Controlled Entities**) for the year commencing 1 January 2021 and ending on 31 December 2021 (**Reporting Period**). The Controlled Entities are set out in the following table:

| Controlled Entity     | ACN         |
|-----------------------|-------------|
| LOC Land Pty Ltd      | 637 528 815 |
| LOC Property Pty Ltd  | 637 528 520 |
| LOC Concepts Pty Ltd  | 637 528 735 |
| LOC Fuel Pty Ltd      | 629 546 149 |
| Albany Retail Pty Ltd | 625 079 781 |

The Reporting Entities, together with the Controlled Entities, are referred to as **Liberty** in this Statement.

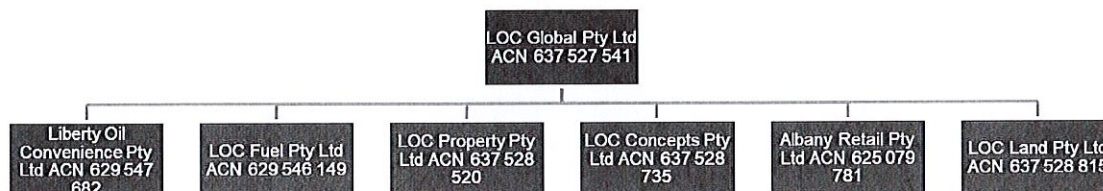
## 3 Structure, operations and supply chains

### 3.1 Our structure

All Liberty entities are proprietary companies limited by shares incorporated under the *Corporations Act 2001* (Cth). LOC Global is the parent company of all other Liberty entities, including Liberty Oil Convenience, as illustrated in the chart below.

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## Liberty structure chart



- Reporting Entities (as defined in the Act) making this joint modern slavery statement
- Controlled Entities also covered by this joint modern slavery statement

LOC Global 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 (**New World**). Viva Energy is one of Australia's leading energy companies and has separately prepared its own modern slavery statement. New World is equally owned by the families of David Goldberger and David Wieland who have had a significant presence in the downstream petroleum industry since the 1970s.

While each Liberty entity covered by this Statement conducts different activities, all of the Liberty entities have the same directors and executives. Further, Liberty applies a uniform approach to risk management and identification across all the Liberty entities.

The registered office of all the Liberty entities is 381 Tooronga Road, Hawthorn East, VIC 3123.

### 3.2 Our operations

Liberty is primarily a retailer of petroleum products.

Liberty's core operations include leasing of service stations (and unmanned fuel stations) that sell petroleum products which are generally operated through a commission agent structure (**Sites**). These Sites are located in the metropolitan areas of Adelaide, Melbourne and Brisbane and regional areas of all Australian states and territories, except the ACT and Tasmania. Liberty's entire operations are conducted in Australia. During the Reporting Period, Liberty:

- leased approximately 91 Sites, including one Site that Liberty operated directly for a period of 10 weeks during the Reporting Period (**Albany Site**), 87 Sites operated by commission agents, and three unmanned Sites; and
- employed approximately 40 full time staff at its head office and throughout Australia, and approximately 33 casual workers employed at the Albany Site.

Liberty's other operations include:

- offering convenience products for sale at convenience stores situated on certain Sites (for the limited number of Sites not operated by commission agents); and
- developing new Sites and performing upgrades to existing Sites. Currently, Liberty has major works underway at approximately two Sites.



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## 3.3 Our supply chain

The table below outlines material categories of third party spending across Liberty's operations. It also notes whether goods and services procured by Liberty under each category were sourced from Australia or overseas.

During the Reporting Period, Liberty only contracted with Australian suppliers, except for one supplier which is incorporated in Hong Kong. All services performed by suppliers for Liberty were conducted in Australia.

A list representing approximately 95% of Liberty's suppliers during the Reporting Period (assessed on the basis of total spending on supply arrangements) is annexed to this Statement in Annexure B.

| Supplier's operations                                           | Key spending                                                                                                                                                                                                                 | Location                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Fuel procurement</b>                                         | <ul style="list-style-type: none"> <li>Fuel products are sourced exclusively from Viva Energy.</li> </ul>                                                                                                                    | <ul style="list-style-type: none"> <li>Viva Energy operates in Australia.</li> <li>Crude oil and fuel products sourced by Liberty's supplier originate from overseas locations.</li> </ul>                                                                                        |
| <b>Rent</b>                                                     | <ul style="list-style-type: none"> <li>Sites are rented predominantly from Viva Energy.</li> </ul>                                                                                                                           | <ul style="list-style-type: none"> <li>All Sites rented are located in Australia.</li> </ul>                                                                                                                                                                                      |
| <b>Convenience retailing</b>                                    | <ul style="list-style-type: none"> <li>Inventory for sale, including food and beverage products.</li> </ul>                                                                                                                  | <ul style="list-style-type: none"> <li>Products procured in this category originate from both Australia and overseas.</li> </ul>                                                                                                                                                  |
| <b>Construction and renovation</b>                              | <ul style="list-style-type: none"> <li>Contractor fees.</li> <li>Fees for raw materials.</li> </ul>                                                                                                                          | <ul style="list-style-type: none"> <li>One of Liberty's building materials suppliers is located in Hong Kong.</li> <li>Construction contractors provide services in Australia.</li> <li>Certain building materials originate from overseas locations, including China.</li> </ul> |
| <b>Acquisition and maintenance of service station equipment</b> | <ul style="list-style-type: none"> <li>Service station equipment, such as fuel-system equipment, point-of-sale equipment, signage and store fit-out.</li> <li>Maintenance services for service station equipment.</li> </ul> | <ul style="list-style-type: none"> <li>Certain service station equipment originates from overseas locations, including China.</li> <li>Suppliers perform maintenance services in Australia.</li> </ul>                                                                            |
| <b>Corporate overheads IT services and infrastructure</b>       | <ul style="list-style-type: none"> <li>IT services and infrastructure</li> <li>PPE, masks, uniforms</li> <li>Cleaning and facilities management services</li> </ul>                                                          | <ul style="list-style-type: none"> <li>Suppliers in this category provide services in Australia.</li> <li>Certain raw materials in this category are sourced from overseas locations.</li> </ul>                                                                                  |

## 4 Risks of modern slavery practices

For the purposes of preparing this Statement, Liberty has assessed its internal operations and external supply chains to identify modern slavery risks. The steps involved and the conclusions drawn from its assessment are summarised in further detail below.

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Given the nature of Liberty's operations and supply chains, certain risks relate to different Liberty entities. However, Liberty adopts a uniform approach to risk identification and management across all Liberty entities. As such, the analysis of modern slavery risks in this Statement applies to all Reporting Entities and Controlled Entities covered by this Statement. Where certain risks relate to a single Liberty entity (and do not relate to others), this is noted below.

## 4.1 Internal operations

To assess modern slavery risks in its internal operations, Liberty took the following steps:

- identifying the location and scope of engagement of each of its employees;
- considering the process through which Liberty onboards new workers;
- considering the processes, policies and procedures which apply to its workers, including its Work Health, Safety and Environment (**WHSE**) Policy and Whistleblower Policy; and
- considering the training provided to its employees around workplace conduct and material risks.

Liberty's assessment of its internal operations confirmed that:

- during the Reporting Period, its workforce consisted of approximately 40 full time employees and 33 casual employees engaged in Australia under formal employment contracts;
- all Liberty employees have received contracts in English, being a language and format that they can easily understand;
- all Liberty employees undergo robust induction processes covering appropriate standards of workplace conduct, frameworks for incident reporting and remediation, and WHSE information;
- Liberty primarily employs skilled workers with the experience required to perform duties safely and competently;
- all people engaged to work for Liberty are free to terminate their engagement at any time with notice; and
- Liberty never charges workers a recruitment fee.

Given the above findings, Liberty considers the risks of causing modern slavery practices in its internal operations to be low. To the extent that any such risks exist in Liberty's internal operations (including WHSE risks), the steps undertaken by Liberty to address those risks are summarised below in section 5.

## 4.2 Supply chains

Modern slavery risks within Liberty's supply chains are distinct from those in its internal operations. Liberty understands that there is a risk that it may contribute to or be directly linked to the modern slavery practices of other entities deep within its supply chain, including entities with which it does not have a direct contractual relationship. To identify and assess such modern slavery risks, Liberty took the following steps:



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- identifying and categorising Liberty's key suppliers in terms of areas of material spending;
- identifying relevant risk factors by reviewing the guidance published by the Australian Border Force and others, and previous modern slavery statements published by Liberty's suppliers;
- making efforts to engage with suppliers by issuing questionnaires requesting information concerning modern slavery risks; and
- identifying risk factors that were relevant to Liberty's suppliers and considering which suppliers may have been affiliated with sectors, industries, geographies, products and services associated with increased modern slavery risk.

Where Liberty determined that suppliers may have been connected to sectors, industries, geographies, products and services associated with modern slavery risk, some of those key risks are outlined in the table below.

| Operations                       | Key risks                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Procuring fuel for resale</b> | <p>This risk relates to LOC Fuel Pty Ltd, being the Liberty entity that buys fuel for resale. Liberty's procurement in this category involves sourcing fuel exclusively from Viva Energy. Viva Energy has published its own 2021 modern slavery statement describing the findings of its risk assessment of its fuel supply chain. Liberty has reviewed that statement and understands that it may be directly linked to the modern slavery practices of various non-affiliated sources involved in fuel procurement and transport. For example:</p> <ul style="list-style-type: none"> <li>■ Viva Energy's assessment recognised that there is a risk that vessels used to transport crude oil products and fuel products could expose the crew to conditions resembling forced labour or other unacceptable working conditions. This risk has recently been exacerbated by COVID-19 pandemic-related restrictions, which distressed supply chains and created novel logistical issues; and</li> <li>■ there is a risk that raw material extraction and the manufacture of fuel products could be associated with vulnerable populations in higher-risk geographies, which increases the risk of modern slavery practices in these activities.</li> </ul> |
| <b>Commission agents</b>         | <p>Commission agents engaged by Liberty are all located in Australia. Each commission agent is a small business with no substantial external reporting accountability. Accordingly, there may be a risk that commission agents are engaging in modern slavery practices in their internal operations, or procuring goods and services from suppliers who are associated with increased modern slavery risks.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Convenience stores</b>        | <p>This risk relates to Liberty Oil Convenience, which procured inventory for sale at the Albany Site during the Reporting Period. Food and beverage products are areas that may involve practices constituting modern slavery due to the nature of the work involved in manufacturing, processing, packaging and transport. Specific high-risk products include nuts, tea and coffee which are known to be associated with child labour in their supply chains. To the extent that Liberty sells these products in its convenience stores, it may give rise to modern slavery risks.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Construction and renovation</b>                              | This risk relates to LOC Concepts Pty Ltd, being the Liberty entity that deals with construction and development. Liberty's procurement in this category involves engaging builders for construction and development who will then engage their own employees and subcontractors and acquire raw materials. Modern slavery risks are heightened when labour is procured through third parties. However, Liberty considers that the engagement of employees and subcontractors is relatively low risk as all work is performed in Australia, and is therefore subject to Australia's relatively strong regulatory framework. Despite this, Liberty recognises there are some modern slavery risks present given that Australian companies often source raw building materials from countries considered high risk for modern slavery. For example, one of Liberty's tier 1 suppliers is located in Hong Kong and as such procures building materials from China, which gives rise to a risk that Liberty is directly linked to modern slavery through its business relationship with that tier 1 supplier. |
| <b>Acquisition and maintenance of service station equipment</b> | Liberty's procurement in this category involves acquiring 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. Where the ultimate source of the raw materials is overseas, there is an inherent risk that those materials originate from geographic locations associated with modern slavery risks. This risk relates to Liberty Oil Convenience, being the Liberty entity that procures these goods and services.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>IT services and infrastructure</b>                           | This risk relates to Liberty Oil Convenience, being the Liberty entity that procures IT services and infrastructure from third parties who obtain these products and services on Liberty's behalf. There is a risk of modern slavery practices in the supply chains that extract raw materials, manufacture products and dispose of them.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Uniforms and PPE</b>                                         | This risk relates to Liberty Oil Convenience, being the Liberty entity that procures PPE from third parties, including safety glasses, high visibility clothing, gloves and masks. The manufacture of PPE overseas is known to pose risks of modern slavery, for example, due to its use of migrant labour, low wages across the sector, and unrealistic production targets during the COVID-19 pandemic.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Cleaning and facilities management</b>                       | This risk relates to Liberty Oil Convenience, being the Liberty entity that engages workers for office cleaning services and facilities management. Liberty understands there is a risk that the nature of these services could be connected to vulnerable sectors of the worker population. Additionally, due to the unprecedented demand for hygiene and sanitation goods throughout the COVID-19 pandemic, the products used by such workers are associated with heightened modern slavery risks.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

## 5 Addressing risks of modern slavery practices

An overview of the measures Liberty has in place to address modern slavery risks in its internal operations and supply chains is set out in the table below.

| Risk management approach        | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Robust induction process</b> | Liberty's induction process is designed to ensure that candidates are provided with formal employment contracts, Liberty's full suite of employment policies, a tax file number declaration form and a superannuation choice form. Liberty's officers, leadership staff and workers are all expected to comply with Liberty's policies. Additionally, Liberty conducts investigations to confirm that candidates have permission to work in Australia and that any visa conditions are satisfied. |



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**Policies and standards of conduct** All of Liberty's people are required to comply with Liberty's Working Together Policy (**WTP**), which provides that all employees have the right to be treated with respect, dignity and courtesy, and affirms Liberty's commitment to safeguarding the human rights of its employees. The WTP aims to ensure that Liberty's staff are not subjected to any unlawful discrimination, unwanted workplace harassment or bullying, and sets out the standards of conduct expected of Liberty employees. The WTP also establishes a complaints procedure to be followed if a person has a complaint about a breach of the WTP. Liberty provides its WTP to each employee, and employees must acknowledge that they have received and have understood the WTP. Liberty's policies are also posted at various communal locations at Liberty's offices.

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**Incident reporting** Liberty's Whistleblower Policy documents Liberty's commitment to high standards of conduct in its business activities, and to supporting a culture of honesty, good corporate governance, and strong personal ethics. The Whistleblower Policy encourages individuals to raise concerns and report instances of improper conduct without fear of intimidation or reprisal. 'Improper conduct' under the policy includes the contravention or suspected contravention of federal law, and is sufficiently broad to cover contraventions of the modern slavery offences in Divisions 270 and 271 of the Commonwealth Criminal Code. It also includes unethical or other illegal conduct, fraud or dishonesty, unsafe work practices and abuses of authority.

Subject to certain conditions being met, the protections contained in Liberty's Whistleblower Policy can be utilised by any individual who is an employee or officer of Liberty, or an individual (paid or unpaid) who supplies goods or services including suppliers, consultants, service providers, commission agents and others.

Liberty is committed to confidentiality and fairness in matters raised under its Whistleblower Policy. Liberty engages an independent third party to investigate whistleblower complaints. Liberty aims to remediate these complaints on a case by case basis, as appropriate.

While the Whistleblower Policy was utilised twice during the Reporting Period, these incidents did not have any connection with modern slavery practices.

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**WHSE compliance** Liberty is committed to providing a safe and healthy workplace for all of its workers, and to the protection of the environment. Liberty aims to maintain and continually improve its WHSE performance, ensuring that it minimises risks of harm to people and the environment. This commitment is supported by a WHSE management system characterised by:

- a systematic approach to identifying, assessing and controlling hazards and risks, managed by Liberty's National Safety and Compliance Manager and supervised by Liberty's leadership team and board of directors ;
- continual improvement of this system through regular audits and reviews;
- consulting, communicating and seeking feedback on WHSE matters;
- provision of training and resources, including mandatory staff training related to WHSE risks; and
- support for contractors to comply with WHSE requirements.

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**Response to COVID-19** The COVID-19 pandemic significantly impacted Liberty's operations. Liberty's focus during the pandemic was to safeguard the health and wellbeing of its workforce and the community while minimising any disruptions to its operations. Liberty's response involved consistent and clear communication about health risks, facilitating working from home arrangements where possible and ensuring compliance with all government-imposed restrictions. Due to Liberty's response to the impact of the pandemic on its business, it does not consider the pandemic's impact on its internal operations to be material to any modern slavery risks.

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**Commission agents** All commission agents are contractually obliged to comply with applicable employment and other workplace laws. On appointment, commission agents are provided with information regarding applicable laws (including modern slavery considerations and employment laws) and are required to formally acknowledge that it is their responsibility to comply with those obligations.

Liberty and all commission agents are members of the Australasian Convenience and Petroleum Marketers Association (**ACAPMA**), the national peak body representing the interests of the fuel wholesale, distribution and retail industry in Australia. Liberty requires all commission agents to complete appropriate ACAPMA training courses regarding WSHE and associated risks. Various Liberty employees also participate in such training courses. Commission agents also undergo annual employment compliance audits implemented independently by ACAPMA.

In response to the reduced sales volume caused by the COVID-19 pandemic, certain commission agents reviewed and reduced their trading hours during the Reporting Period.

**Supplier engagement** Liberty has identified its major suppliers and has sought to engage with them to better understand their modern slavery risks, the measures they are taking to address those risks, and any potential gaps in their approach. Liberty has done so by requiring its major suppliers to respond to a modern slavery questionnaire describing their approach to managing modern slavery risks.

Viva Energy is Liberty's most significant supplier, both in terms of spend and criticality to Liberty's business. Liberty has reviewed Viva Energy's 2021 modern slavery statement to understand the steps taken by Viva Energy to manage modern slavery risks in its fuel supply chain. These steps taken by Viva Energy are summarised in section 5 of that statement and include (without limitation):

- engaging with key fuel shipping suppliers to understand their modern slavery risks;
- individually vetting vessels and crew involved in fuel shipping in accordance with the INTERTANKO vetting process;
- performing sanction checks of the vessel owners and operators;
- ensuring each vessel holds a current Maritime Labour Convention certificate; International Transport Workers' Federation agreement or equivalent;
- ensuring vessels used meet Australian Maritime Safety Authority requirements;
- assessing each vessel against the Oil Companies International Marine Forum inspection reports; and
- reviewing Port State Control inspections for every vessel.

Liberty has not taken any steps to verify Viva Energy's assessment of its fuel supply chain risks.

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Some of the measures described above in sections 4 and 5 of this Statement, combined with the communication of those matters in this Statement, form part of Liberty's process of modern slavery due diligence. Liberty will consider further formalising its due diligence process in the future.

## 6 Assessing the effectiveness of actions taken

Liberty is committed to providing a safe and healthy workplace for its people. As part of its WHSE management system, Liberty regularly audits and reviews its approach to risk management within its internal operations and takes comprehensive steps to ensure continual improvement.

To assess the effectiveness of its WHSE management system, Liberty holds a monthly safety meeting with its National Safety and Compliance Manager and board of directors. Incidents reported in the

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previous month are discussed and considered by the directors, as well as any recommendations designed to control risks. Liberty strongly encourages all workers and commission agents to report any safety incidents as they arise. Safety matters arising from modern slavery risks can be reported in this way.

In addition, Liberty engages third parties to assess and advise on material risks affecting Liberty's operations, including dangerous goods risks, environmental risks and incident remediation. Recommendations are considered by Liberty's leadership team and board of directors and adopted as necessary.

Liberty's policies and procedures establish frameworks for workers to report any complaints and instances of improper conduct, including behaviour that is unethical or illegal, without fear of reprisal. Depending on the substance of the complaint, certain complaints are referred to third parties for investigation and remediation. Liberty is committed to taking corrective action where required.

Liberty requires commission agents to undergo training facilitated by ACAPMA and monitors the number of commission agents that complete this training. During the Reporting Period, 100% of Liberty's commission agents completed this training.

Liberty has made efforts to engage with its suppliers by requiring them to respond to questionnaires about modern slavery risk management. During the Reporting Period, Liberty has measured the number of surveys completed and returned.

Liberty also measures the number of times that its Whistleblower Policy is utilised in each reporting period, and whether these incidents relate to modern slavery. Liberty acknowledges that any whistleblower policy which is not being utilised is likely to be ineffective. Liberty's Whistleblower Policy was utilised twice in the Reporting Period, although neither incident related to modern slavery.

Liberty's approach to managing modern slavery risks in its supply chains is continuously evolving. As Liberty's approach to modern slavery matures, it will look to improve its measurements of effectiveness. To achieve this, Liberty intends to:

- conduct a comprehensive review of its approach to identifying and assessing modern slavery risks in its operations and supply chains, and the effectiveness of steps being taken to assess and address those risks;
- engage external third parties to consult specifically on how Liberty can improve modern slavery risk management; and
- work with those external third parties to implement their recommendations in order to approve its existing efforts in this space.

## 7 Consultation process

Liberty applies a uniform approach to risk assessment and management across each of the Liberty entities covered by this Statement. Liberty is overseen and managed by the same directors and leadership team, with all policies, systems and processes designed to be consistently applied across Liberty. In light of Liberty's group-wide approach, the consultation process among the Liberty entities occurs organically. As such, key people responsible for all Reporting Entities and all Controlled Entities were consulted in preparing this joint Statement including Liberty's Chief Executive Officer, Chief Financial Officer, the Directors and its payroll team. Furthermore, the analysis of modern slavery risks in this Statement applies to all Reporting Entities and Controlled Entities covered by this Statement.



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## 8 Approval

This Statement was reviewed and approved by the principal governing bodies (boards of directors) of each of the Reporting Entities on **30** June 2022.

This Statement was signed on **30** June 2022 by **David Wieland** in his role as Director of each Liberty entity.



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Signature of **David Wieland**  
Director of each Liberty entity

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## Annexure A - Mandatory criteria under section 16 of the Act

| Act ref | Mandatory criteria                                                                                                                                                                                 | Page |
|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| 1(a)    | Identify the reporting entity                                                                                                                                                                      | 1    |
| 1(b)    | Describe the structure, operations and supply chains of the reporting entity                                                                                                                       | 1-3  |
| 1(c)    | 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                            | 3-6  |
| 1(d)    | 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 | 6-8  |
| 1(e)    | Describe how the reporting entity assesses the effectiveness of such actions                                                                                                                       | 8-9  |
| 1(f)    | Describe the process of consultation with any entities that the reporting entity owns or controls and the entity giving the statement                                                              | 9    |
| 1(g)    | Include any other information that the reporting entity, or the entity giving the statement, considers relevant.                                                                                   | N/A  |
| 2(b)    | Details of approval by the relevant principal governing body or bodies                                                                                                                             | 10   |



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## Annexure B - List of key suppliers

| Supplier name                                              | Category                 |
|------------------------------------------------------------|--------------------------|
| Viva Energy Australia Pty Ltd                              | Fuel & rent              |
| Horizon Constructions (Australia) Pty Ltd                  | Construction             |
| Coromandel Corporation Limited (incorporated in Hong Kong) | Construction & equipment |
| Australian Taxation Office                                 | Statutory                |
| Ver Custodian Pty Limited                                  | Licence fee.             |
| Computer Vision Business Solutions Vic Pty Ltd             | Tech services            |
| Grand Ideas Pty Ltd t/as Signwave                          | Equipment                |
| Gilbarco Australia Pty Limited                             | Equipment                |
| Liquid Mix (Wa) Pty Ltd                                    | Stock (Alcohol Supplier) |
| Quicksuper                                                 | Statutory                |
| Essco Industries Pty Ltd                                   | Construction & equipment |
| Liberty Oil (WA) Pty. Ltd.                                 | Non-recurring            |
| PFD Food Services Pty Ltd                                  | Stock                    |
| Network Insurance Group                                    | Insurance                |
| Commissioner Of State Revenue (Vic)                        | Statutory                |
| Office Of State Revenue Qld                                | Statutory                |
| RSEA Pty Ltd                                               | Equipment                |