



MODERN SLAVERY STATEMENT

Vantage Fuels Pty Ltd ACN 151 023 040

Reporting Year: 1 July 2019 - 30 June 2020





INTRODUCTION

We are a family business operating principally in the retail sector as an independent fuel retailer. Our business is conducted exclusively in Australia and our operations are all subject to Australia's strict regulatory framework. Our key products are purchased from large, often multinational, suppliers. Given our domestic operations and the downstream position we occupy in our supply chain, the risk that modern slavery practices could be present within our operations was not, prior to the commencement of the Modern Slavery Act 2018 (Cth) (Act), directly assessed or addressed by our organisation. The introduction the Act has provided a welcome opportunity for us to explore, consider, assess and commence the process of addressing the risks of modern slavery in our operations and supply chain.

This report has been prepared based on the supply chain analysis carried out during the reporting year commencing 1 July 2019 and concluding 30 June 2020 (2020 Year). Our focus during the 2020 Year was to prepare a map of our supply chain the based on the products and services that are essential to the operation of our business. We are committed to ensuring that our policies, procedures and processes for combating the risks of modern slavery in our operations and supply chain improve overtime as we develop our knowledge and understanding of our supply chain and refine the techniques used to assess our modern slavery risks.

We are pleased to submit our first Modern Slavery Statement in accordance with the requirements of the Act.



CHAPTER 1 - WHO WE ARE

Vantage Fuels Pty Ltd ACN 151 023 040 (Vantage/ we/ us/ our) is a privately owned proprietary company limited by shares. Vantage was incorporated in Victoria on 20 May 2011. There are two company directors of Vantage.

Vantage's registered office and principal place of business is located at 7 Woodlands Court, East Bendigo, Victoria. Part of our head-officer operations are also conducted from our office located in South Melbourne.

CHAPTER 2 - OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Our Operations:

Our core business is the operation of service stations including convenience stores and cafes. Our sites are located within regional Victoria and New South Wales.

We are an independent fuel retailer and fuel is supplied to our sites by two multinational fuel suppliers. Our cafes, trading as 'Bowser Bean Café', offer high quality, convenient food and coffee and are located within 15 of our service station sites.

Key facts and figures:

At the time of publication:

- Vantage's network includes 34 service station sites in regional Victoria and New South Wales;
- 11 sites are operated by commission agents (the commission agents operate the "shop" component of the business and the fuel component of the business is managed by us);
- Bowser Bean Café operates within 15 sites; and
- we are proud to employ approximately 17 staff in our head office and a further 252 staff in our sites.

Structure:

Vantage is the primary operating entity within a private (family) group of entities. The activities of the group are principally centered around the business operations of Vantage. Vantage does not own or control other entities.



Supply chains:

A general depiction of Vantage's supply train is illustrated below:



Supply chains:

The key products and services that are essential to the operation of our business are:



2020 Year supplier analysis

- Our relationships with our key suppliers are generally strong, established and longstanding.
 - Our key products and services are all supplied by organisations who have domestic (Australian) operations.
 - Whilst our key suppliers all have domestic operations and our procurement from those suppliers takes place domestically, the raw materials or component parts used in the production and manufacture of some of our products may be sourced internationally. Further supply chain analysis and supplier engagement is required to enable us to better understand where these component parts and raw materials are produced and/ or sourced.
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CHAPTER 3 - DESCRIPTION OF THE RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN

Risks that we *cause* modern slavery in our operations

We operate exclusively within Australia and our operations are all subject to Australian law. We foster a strong compliance culture and submit, on an annual basis, to an independent compliance audit of our employment conditions and safety practices as well as to an independent, annual audit of our financial statements.

Eleven of our sites are operated by commission agents and, as we are not responsible for employing the staff at these sites, each commission agency site is required to submit to an annual, independent audit of its employment conditions and safety compliance. Having regard to our domestic regulatory framework, the downstream position we occupy in our supply chain, the size and nature of our key suppliers and the outcome of our audits and those of our commission agents, we are confident that neither our operations nor our conduct within our supply chain directly causes modern slavery.

Risks that we *contribute* to modern slavery practices in our supply chain

Price is one of the factors we consider when making procurement decisions. While price is not generally the sole determinant of a procurement decision, the fact that it is considered at all may create pressure for our suppliers to source their products or supply their services at a lower price. This, in turn, could create a risk of facilitating or contributing to modern slavery practices further up our supply chain.



Risks that we may be *directly linked* to modern slavery practices in our supply chain

We do not have direct contractual relationships with all participants in our supply chain. In these circumstances, there is an inherent risk that our operations and supply chain could be linked to modern slavery practices through the activities and conduct of other entities in our supply chain.

The following further risks have been identified based on the analysis of our supply chain in the 2020 Year:

Product risks and industry risks: Some products within our supply chain are manufactured using processes that are known to be associated with risks of modern slavery or within industries where there are known risks of modern slavery. Such products and/ or industries include coffee beans (used in the production of coffee), cacao (used in the production of chocolate), tobacco (used in the production of cigarettes) and the textile industry (used to produce the uniforms worn by our staff and the 'general merchandise' sold in our sites (hats/ beanies etc)).

Geographic risks: Some of the raw products used in the manufacture of products within our supply chain may be sourced from countries where there are established risks of modern slavery.

Further analysis of our supply chain (including increased supplier engagement) is required to enable us to better understand the nature and extent to which we could be directly linked to modern slavery practices through the manufacturing processes used in our supply chain and/ or the geographic source of the raw materials used in our products.



CHAPTER 4 - DESCRIPTION OF THE ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

In the 2020 Year, a Vantage modern slavery team was created. The team's principal mandate was to create a framework for assessing and addressing the risks of modern slavery in our operations and supply chain.

The key outcomes of the modern slavery team in the 2020 Year include:

Action Plan: An action plan was created to establish our key priorities for assessing and addressing the risks of modern slavery in the 2020 Year.

Policy: A modern slavery policy was developed to assist with the creation of uniform standards and systems in our business to minimise the risks of modern slavery in our operations and supply chain.

Supplier Compliance Program (SCP): A SCP was developed to facilitate discourse with our suppliers in relation to modern slavery and to confirm our expectations and standards in relation to the conduct of our suppliers.

Due Diligence: Our initial due diligence activities, including scoping and mapping of our supply chain, was undertaken and a risk assessment was carried out.

Key resources that were used by Vantage's modern slavery team in preparing our action plan, our modern slavery policy, the SCP and in undertaking our due diligence are listed in Annexure 2.

Remediation - Based on the analysis conducted in the 2020 Year, we are confident that we do not directly cause modern slavery. To the extent that we may be linked to modern slavery practices via our supply chain, we are concerned, based on our position in our supply chain (retailer) and the size and standing of our key suppliers (often large multinationals), that we do not currently have sufficient leverage to meaningfully remediate any modern slavery practices identified in our supply chain. Notwithstanding this, we are committed to strengthening our approach to managing the risk of modern slavery in our operations. In turn, we hope that this will contribute to reducing the risk of modern slavery in our supply chain. Key to achieving this outcome will be improved knowledge of our supply chain and increased supplier engagement in relation to modern slavery. This will be a key focus of future reporting years.



CHAPTER 5 - DESCRIPTION OF HOW WE ASSESS THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

At the end of each reporting year, a review is undertaken by the Vantage modern slavery team to consider the effectiveness of the actions taken in the relevant reporting year and to set the priorities for the following reporting year.

For future reporting years, to improve the efficacy of this analysis and to ensure it has a quantitative basis, the modern slavery team will create a set of key performance indicators against which the effectiveness of our actions will be assessed.



APPROVAL & SIGNATURE

This statement is **approved** by both directors of **Vantage Fuels Pty Ltd** ACN 151 023 040 and is signed by Haydn Tierney as the **responsible member**:


HAYDN TIERNEY


DATE



ANNEXURE 1 - summary of mandatory criteria from section 16 of the Act for Modern Slavery Statements

MANDATORY CRITERIA	LOCATION IN STATEMENT
Section 16(1)(a) of the Act	Chapter 1
Section 16(1)(b) of the Act	Chapter 2
Section 16(1)(c) of the Act	Chapter 3
Section 16(1)(d) of the Act	Chapter 4
Section 16(1)(e) of the Act	Chapter 5
Section 16(1)(f) of the Act	Not applicable (Vantage does not own or control other entities)
Section 16(1)(g) of the Act	Further information is set out in the introduction & in Annexure 1 & 2

ANNEXURE 2 – key resources

DESCRIPTION OF RESOURCE	HOW USED
Tackling Modern Slavery in Supply Chains A Guide 1.1 – produced by the Walk Free Foundation	Used in the preparation of the modern slavery framework, supply chain mapping and risk assessment
2018 Global Slavery Index	Used to inform our risk assessment, in particular in relation to geographic risks
US Department of Labour List of Goods Produced by Child or Forced Labour (https://resourcecentre.savethechildren.net/node/4495/pdf/4495.pdf)	Used to inform our risk assessment, in particular in relation to product risks