

EG Australia

2022 Modern Slavery Statement

1. Introduction

The *Modern Slavery Act 2018* (Cth) (the 'Act') requires certain entities to report annually on the risks of modern slavery in their operations and supply chains. In compliance with this obligation EG Australia (including EG Fuelco (Australia) Limited ACN 627 348 645 and EG Group Australia Pty Ltd ACN 629 792 810 and its related bodies corporate) ("EG Australia", "we" or "us") filed its first Modern Slavery Statement ('Statement') on 9 June 2021.

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 2021 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 16 June 2022 and signed by our Chief Executive Officer in accordance with the Act.

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

Our structure

EG Australia is a wholly owned subsidiary of EG Group headquartered in Blackburn, United Kingdom. EG Group is a leading global independent convenience retailer with a diversified portfolio of over 6,322 sites across ten countries in North America, Europe and Australia, supported by over 53,845 employees globally.

In 2019, EG Group Limited (**EG Group**) acquired the petrol business of Woolworths Limited.

EG Australia owns and operates 536 fuel and convenience sites, and currently employs more than 4,500 people nationwide.

Our operations

Our operations have largely remained 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.

In our last Statement we 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 meet our policy and pre-qualification requirements before engagement, and provide warranties to us that they comply with all laws in relation to employment matters.

We have not had any instances of non-compliance reported with our policy from the date of filing our first Statement.

Our Supply Chains

Our supply chain consists of trade suppliers and non-trade suppliers with the 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 them 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 and Responsible Sourcing policies 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 communication channel, Stopleveline, (which is a confidential and anonymous whistle-blower line), for any reports of concerns or disclosure in relation to modern slavery. As at the date of this report, no such reports have been received.

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 relationships and that our suppliers are aligned to our values. This policy applies to our suppliers, employees at all levels, agency workers, contractors, external consultants, third-party representatives and business partners. 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 impact to people in our operations and supply chain.

Some of the suppliers in our extended supply chain fall within the potential risks area due to the geographical locations from which certain goods (or raw materials to manufacture such goods) or services are sourced or the prevalence of sub-contractors within the relevant sector. 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 area 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:

- Vendor Due Diligence:* Continuously ensured vendor due diligence/ integrity checks to identify any risks and appropriate control procedures in the vendor on-boarding or renewal process, and required our large suppliers to provide their own Modern Slavery Statements and policies;
- Compliance with our Responsible Sourcing Policy, Speak Up Policy and Code of Conduct:* Our Responsible Sourcing Policy, Speak Up Policy and Code of Conduct are published on our website and reflect our commitment to act ethically and with integrity in all our business relationships. All of our key suppliers have agreed to contractual terms which require them to comply with modern slavery law and our policies, including a provision for reserving rights to

audit our business partners' operations, facilities and working conditions, procedures and systems to ensure compliance.

- C. *Employee Training*: We commenced a mandatory modern slavery online training program for all our staff, including those involved in procurement decisions in the previous reporting cycle. More than 95% of our staff have successfully completed training and continue to encourage and monitor them in this regard.

We seek to ensure 100% compliance of our employees with our training program, by continuously monitoring and auditing completion of training by all our staff.

- D. *Modern Slavery Questionnaire*: Almost all of our business partners, suppliers and contractors returned to us our completed self-assessment modern slavery due diligence questionnaire and/or warranted that there were no risks of modern slavery practices within their own supply chain or operations.

5. Commitment to Continuous Improvement

We consistently monitor and assess the risks and by way of continuous improvement will strive towards:

- assessing the potential modern slavery risks in our operations and supply chains with emphasis on high risk geographical locations and business transactions;
- conducting due diligence on local and global supply chains;
- reviewing supplier contracts to ensure they contain terms that are consistent with the Act;
- taking steps to address any potential modern slavery risks identified;
- collaborating 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;

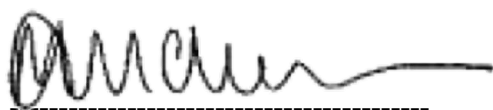
- reporting bi-annually on complaints, potential trends, and risk areas to the Speak-Up Committee and the Board;
- preparing group level Environmental, Social, and Corporate Governance quarterly reports;
- continuous development of training and initiatives to maintain awareness within our organisation; 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 work under a common set of policies and programs relating to modern slavery. A process of consultation across various departments helped to guide the drafting of this Statement.

8. Document control

Document version:	02
Effective from:	30 June 2022
Date approved:	17 June 2022
Approved by:	EG Australia Board
Last review date:	17 June 2022
Next review date:	



Mike McMenamin
Chief Executive Officer
EG Australia