

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 (**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 2022 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 23 May 2023 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 Limited, which is 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 58,000 employees globally.

EG Australia owns and operates 536 fuel and convenience sites, and currently employs more than 4,400 people nationwide.

Our operations

Our operations have materially 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's operations.

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 whistleblower platform 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 in relation to the year ending 31 December 2022.

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. Our risk assessment following consultation with internal stakeholders have 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 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:

- A. *Vendor Due Diligence*: Conduct vendor due diligence/ integrity checks to identify any risks in the request for tender and procurement process and implement appropriate risk controls in our vendor on-boarding or renewal process. We require our large suppliers to provide their own Modern Slavery Statements and policies for our review;
- B. *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. Most 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*: Our employees are required to complete a modern slavery online training. More than 97.5% 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 regularly monitoring and auditing completion of training by all our staff.

- D. *Modern Slavery Questionnaire*: Most of our business partners and suppliers have 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. 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:

- assessing the potential modern slavery risks in our operations and supply chains with emphasis on high risk geographical locations and sectors;
- continuing to conduct due diligence on our supply chains including, by adopting a standard ESG Questionnaire across EG Group which incorporates our existing modern slavery due diligence questions;
- continuing to transition existing suppliers upon renewal of their contracts to updated terms which incorporate modern slavery compliance, and incorporate these terms in new supplier contracts;
- working with EG Group to develop a standard protocol for dealing with any incidents of modern slavery, and taking necessary 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;
- 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.

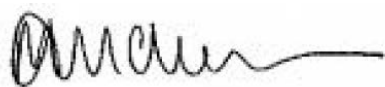
7. Process of consultation

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 2023
Date approved:	23 May 2023
Approved by:	EG Australia Board
Last review date:	17 June 2022



 Mike McMenamin
Chief Executive Officer
EG Australia