

# Modern Slavery Statement

2023



## Reporting Entities

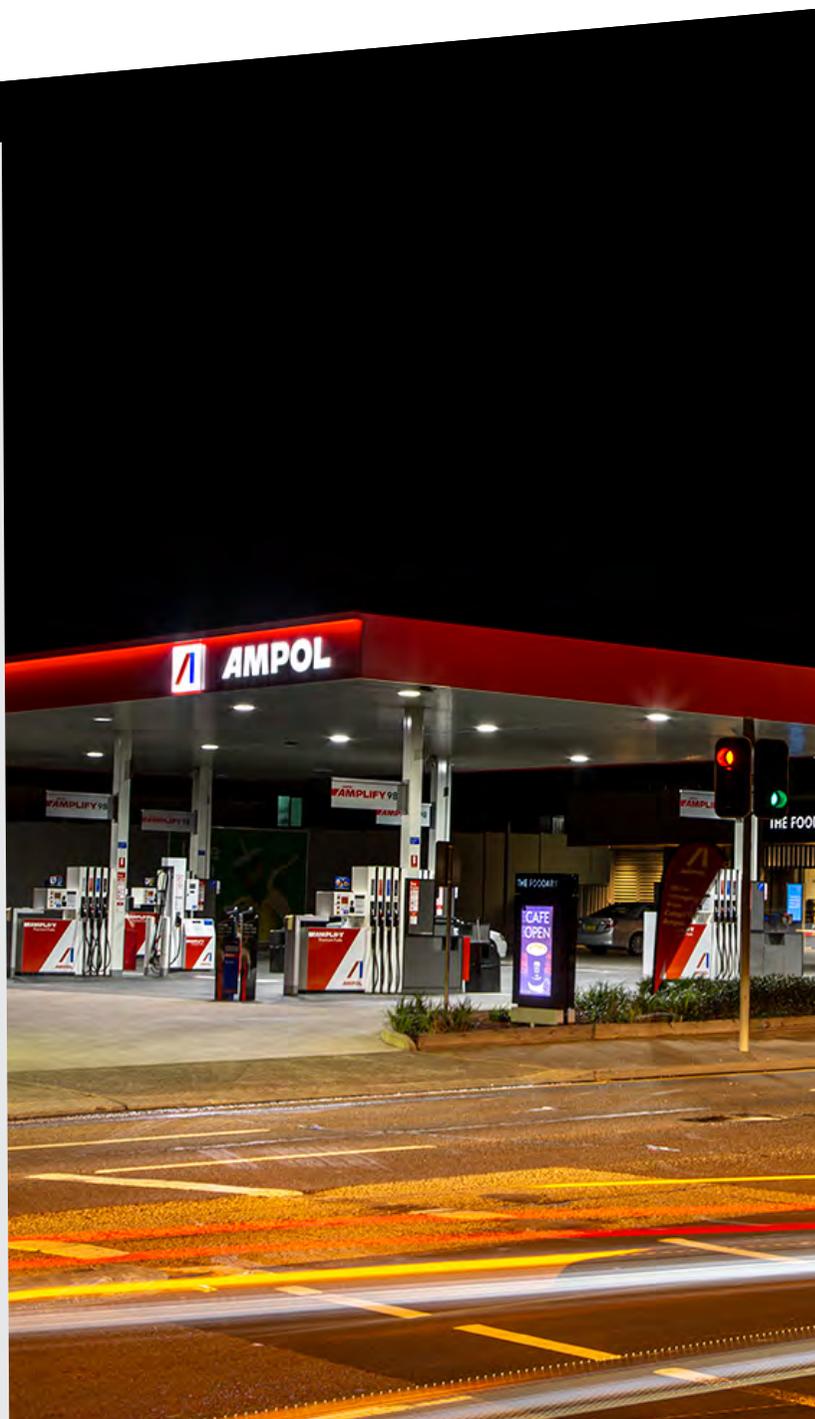
This is a joint Modern Slavery Statement, made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**), for the financial year ended 31 December 2023, covering the following entities that meet the definition of reporting entities in the Act:

- Ampol Limited (ACN 004201307)
- Ampol Australia Petroleum Pty Ltd (ACN 000032128)
- Ampol Retail Pty Ltd (ACN 000175342)
- Ampol Petroleum Distributors Pty Ltd (ACN 005632860)

This Modern Slavery Statement identifies the steps taken in relation to modern slavery by the reporting entities, and the entities wholly owned or controlled by them (together, for the purposes of this statement, "Ampol Group" or "Group"). Throughout this statement terms such as Ampol, Ampol Australia, and 'we' have the same meaning as Ampol Group, unless the context requires otherwise.

## Modern Slavery Act Compliance Table

Modern Slavery Act	Ampol Ltd Modern Slavery Statement 2023
Identify Reporting Entities	Page 2 and 7
Description of the Structure and Supply Chains	Page 4 Pages 7 – 10 Pages 12 – 15
Describe the Risks of Modern Slavery	Page 13 Pages 16 – 17 Pages 21 – 22
Describe the actions taken to address risks, including due diligence and remediation processes and the assessment of effectiveness	Pages 16 – 29
Consultation with entities controlled, owned or covered under the Joint Reporting Statement	Page 30
Any other relevant information	Pages 3 – 6 Page 11 Page 31



## Contents

<b>Message from the Managing Director and CEO</b>	<b>03</b>
<b>About Ampol</b>	<b>04</b>
Our progress in 2023	04
Our approach to modern slavery	05
Our structure	07
Our operations	08
Principal activities	09
Our team	11
<b>Our supply chains</b>	<b>12</b>
<b>Modern slavery risks and practices</b>	<b>16</b>
Modern slavery risks	16
Modern slavery governance	18
Corporate Program	21
Retail Program	22
Seafarer welfare	25
<b>Assessing effectiveness and consultation</b>	<b>29</b>
<b>Other relevant information and approval process</b>	<b>31</b>

## Message from the Managing Director and CEO

*This 2023 Modern Slavery Statement outlines Ampol's continued focus on dealing with modern slavery risk in its supply chains, workplace and the communities in which we operate.*

Like the preceding year, 2023 witnessed a perpetuation of geopolitical tensions globally, marked by ongoing conflict stemming from Russia's invasion of Ukraine, alongside the outbreak of conflict in the Middle East leading to the displacement of people that can create conditions for modern slavery to manifest.

The issue has been on the Australian Government's radar, introducing a bill to establish an Australian Anti-Slavery Commissioner to support and encourage education, improve compliance, and support business in responding to modern slavery.

Modern slavery is insidious in that it often happens behind closed doors. However, that does not mean we turn a blind eye and pretend it does not exist. As an organisation well-versed in risk management and transparency, Ampol has remained vigilant in identifying and responding to modern slavery risk.

Ampol's response to the risks of modern slavery is grounded in our commitment to human rights. During 2023, we reviewed our Human Rights Policy, and our Board approved an updated policy that contains a focus on the employment conditions of persons who contribute to our workplaces.

During 2023, Ampol expanded its retail offerings through the opening of two Hungry Jack's sites in Australia. This, together with our ongoing success in our Boost Juice rollout, forms the basis of our Quick Service Restaurant (QSR) strategy. As we continue to execute our QSR strategy through the launch of different brand offerings, we are aware that the engagement of junior employees (juniors) is common in the QSR industry.

Whilst providing juniors with employment and skills is a positive for both the employee and the community, it also brings with it the potential for modern slavery risk. In anticipation of this growth, 2023 saw Ampol review its terms and conditions of employment of its juniors to ensure its employees are safe, remunerated appropriately and engaged in accordance with law.

2023 saw the rollout of our expanded modern slavery training package to a wider audience than ever before. The training was offered to key employees in Australia, New Zealand and Singapore who make supplier decisions and key members of management who otherwise can give effect to Ampol's modern slavery commitment. By the end of 2023, over 98 per cent of scheduled attendees within the joint reporting entities had completed the training. During 2024, Ampol will continue to look for other means to communicate and educate its workforce on the risks associated with modern slavery.

A key driver of organisational behaviour is the way in which employees are incentivised and remunerated. As part of a broader balanced scorecard of performance measures, the procurement function has specific performance measures relating to modern slavery. The achievement of these objectives will influence how these employees are remunerated. This will ensure that those employees and managers who can influence outcomes are incentivised in a manner consistent with Ampol's stated commitments.

As Australia's leading transport fuels distributor and retailer, Ampol remains determined to have influence in the communities we operate and serve, and the Modern Slavery Statement is an important part of that influence. We all have a role to play in meeting the collective challenge of identifying and stamping out modern slavery in all its forms.

Ampol looks forward to continuing this important work in 2024.



**Matthew Halliday**

Managing Director and CEO

## Highlights from 2023

Implemented a pre-qualification assessment checklist for all existing and new retail suppliers.

Delivered a new Ampol Group modern slavery training module to key personnel in Australia with 98.5% completion rate as at December 2023.

Reviewed and updated the Ampol Group Human Rights Policy.

Rolled out respectful workplaces training across key Fuels and Infrastructure teams.

Completed 23 deep dives on medium & high risk suppliers.

Incorporated modern slavery objectives as a driver for remuneration outcomes for procurement staff.

Conducted 25 audits on retail partners relating to workplace relations compliance, exceeding the 2023 commitment.

Commenced "Peakon" employee listening, forming an additional layer of employee feedback and worker voice.

Focus on child labour risks through a review of the employment terms and regulation relating to juniors (employees under the age of 18) across relevant jurisdictions in Australia.

## Our progress in 2023

In the Ampol's 2022 Modern Slavery Statement, we made commitments on behalf of our joint reporting entities to address the risks of modern slavery in 2023. Our progress against these commitments in 2023 include:

✓ Completed
→ Ongoing Process

- Continual monitoring of guidance notices issued by the Australian Maritime Safety Authority to ensure seafarer health and wellbeing.
- ✓ Review of grievance processes and procedures. The review identified an opportunity for Board and senior leadership training in the management of whistleblower matters. The Board training is scheduled for delivery in the 2024 Board program with senior leadership training ongoing.
- Existing suppliers continue to be transitioned to the updated modern slavery precedent clauses.
- It is mandatory for all eligible suppliers to complete the modern slavery risk assessment process.
- ✓ 85% of suppliers (by spend) have acknowledged the Supplier Code of Conduct and completed the questionnaire.
- ✓ Six deep dive assessments were completed on Future Energy suppliers. The deep dives have resulted in action items being identified which are ongoing in 2024.
- ✓ All Ampol (Australian) franchised sites underwent workplace compliance audits in 2023.
- ✓ 10% of all Australian associated sites (non-controlled) were scheduled for workplace compliance audit. Ampol exceeded this target across both its dealer and distributor channels.
- ✓ In 2023, an online modern slavery training module was developed and rolled out. As at December 2023, over 98% of scheduled attendees completed the module within the joint reporting entities.

### Ampol Group supply chains as at 31 December 2023

**3,091**

Suppliers<sup>1</sup>

**93%**

Australian suppliers representing \$6.88b AUD spend

**7%**

International suppliers

**\$11.9<sub>b</sub>**

AUD spend<sup>2</sup>

In addition to the above, Z Energy total procurement spend (excluding imported fuels) was \$296m NZD from 1,842 suppliers.

1. Suppliers represent third-party providers that Ampol traded with in 2023 across Fuels and Infrastructure and Convenience Retail supply chains.  
 2. Approximate third-party spend excluding taxation and government charges and intercompany transactions.

## Our approach to modern slavery

*Our approach to modern slavery is guided by our risk management framework and is underpinned by our values.*

Ampol's approach to modern slavery is underpinned by the Ampol values and the Ampol Risk Management Framework (**ARMF**), is based on the United Nations Guiding Principles on Business and Human Rights and is collaborative in nature.

### Ampol Risk Management Framework

In our pursuit of effective risk management across our core businesses, execution of our strategy, and decision-making processes, Ampol has instituted a comprehensive enterprise risk management framework. Through this framework, Ampol systematically identifies and addresses a spectrum of financial and non-financial risks inherent in both Australian and international markets including sustainability and climate related risks.

The ARMF aligns with the International Standard ISO 31000:2018 for Risk Management and adheres to the ASX Corporate Governance Principles and Recommendations. It is reinforced by a three lines of defence assurance model, embedding risk management as a key aspect of our organisational culture.

The ARMF is a key component of our strategic planning and decision-making processes, ensuring that Ampol not only mitigates risk but also capitalises on the opportunities presented by the transition to a low carbon economy. We are dedicated to continually enhancing our risk management practices, safeguarding our business and delivering long-term value to our shareholders.

Our approach to risk management is underpinned by top-level commitment, ensuring alignment with our strategic objectives and corporate values. For example:

- The Board-approved Ampol Group Risk Management Policy that establishes the roles and responsibilities of the Board and senior Management.
- The ARMF is codified in our Corporate Governance Statement and the various Board and Committee charters.
- Each year the Board reviews and determines whether the framework remains sound and consistent with ASX Corporate Governance Principle 7.2.
- Each material risk has a nominated risk owner from the Ampol Leadership Team (**ALT**) who is accountable to ensure an annual review takes place and findings are reported to the Board. For modern slavery, the Risk Owner is the Group General Counsel.

Ampol's approach to risk management is also outlined in our Corporate Governance Statement, which is available on our [website](#).

The modern slavery risk is recognised by the ARMF as a risk source within the Regulatory and Compliance risk. The effectiveness of control measures relating to it are assessed regularly.

The control measures for the modern slavery risk as at 31 December 2023 include:

- the Ampol Modern Slavery Statement;
- modern slavery training;
- the Ampol Supplier Code of Conduct; and
- the Ampol Modern Slavery Risk Assessment and Mitigation Standard.

During 2024, Ampol will seek to introduce a Human Rights and Labour Group Standard and will include the standard as an additional control measure.\*

\* See page 17 for further detail.

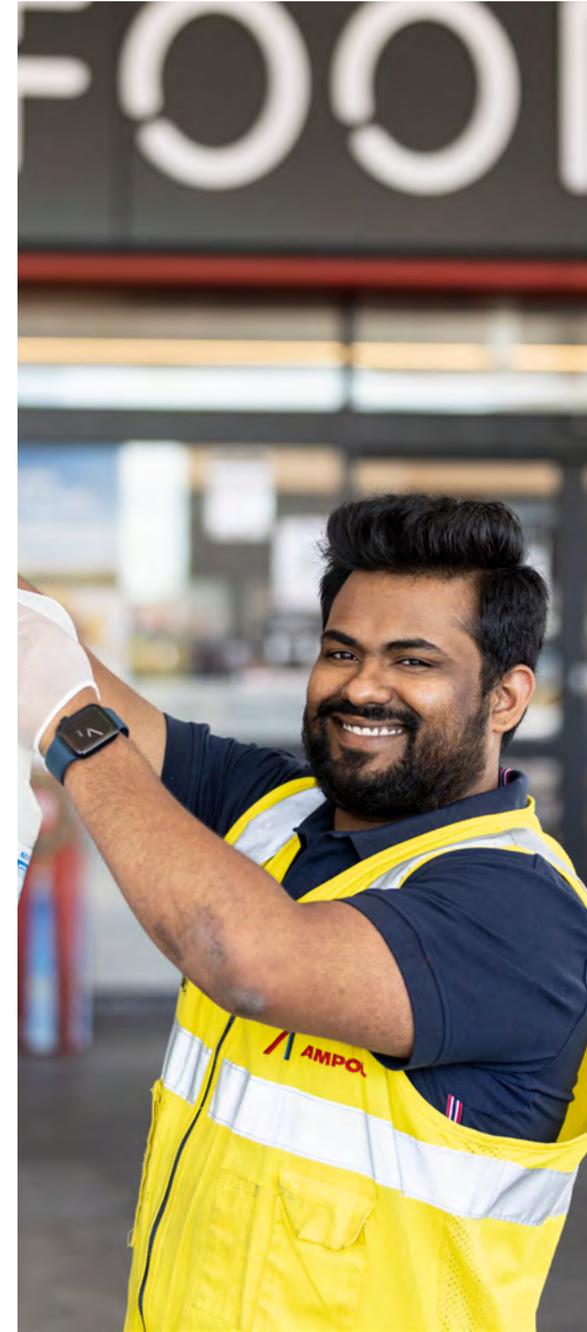
### Enhanced Compliance Program

During 2023, Ampol commenced a project to develop an Enhanced Compliance Program, which comprises standards, policies and a forum made up of business representatives with each owning a particular area of compliance. In addition to forming part of the ARMF, Ampol has included modern slavery matters (including reporting matters) in the program.

The Enhanced Compliance Program is guided by a new Group Standard which formalises Ampol's compliance principles, governance activity and aligns compliance activities to ISO 37301.

The Enhanced Compliance Program includes a suite of core compliance topics. Each core compliance topic is allocated an owner and compliance obligations are identified and recorded. Modern slavery has been identified as a component of the human rights core compliance topic at Ampol.

The inclusion of the modern slavery subject matter into the Enhanced Compliance Program means that those with a responsibility for modern slavery matters have access to the resources, tools and updates from external providers to ensure Ampol's practices are consistent with its requirements under the modern slavery legislation.



## Our approach to modern slavery continued

### Ampol Group Modern Slavery Risk Assessment and Mitigation Standard

Ampol's modern slavery risk assessment and mitigation standard provides a framework for assessing and addressing modern slavery risks when purchasing goods and services and is routinely used by Ampol employees and contractors to evaluate supply chain risk.

The Standard was implemented in November 2022 and the next periodic review is due in November 2025. The document will be reviewed and updated earlier where there is feedback from the Ampol modern slavery working group or there is regulatory change informed by the Enhanced Compliance Program.

### United Nations Guiding Principles on Business and Human Rights

We recognise our responsibility to avoid causing or contributing to modern slavery through our activities. We also recognise our responsibility to mitigate modern slavery risks that are otherwise linked to us, including through our supply chains. This responsibility requires us to have clear policies, due diligence, and remediation processes. Recognising we cannot tackle all potential modern slavery risks at once, we have continued to prioritise our mitigation activities, considering the severity of the risk and our ability to influence outcomes. Our changing business activity helps to prioritise our response. For example, in 2023 our expansion into Quick Service Restaurants prompted us to proactively consider issues associated with child labour.

### Collaborative approach

Our preference is to engage, collaborate and work with others to address modern slavery and bring about meaningful change. We recognise that collaboration broadens our reach and will allow us to educate, share knowledge and learn from others, ultimately leading to better management of modern slavery risks both by Ampol and business generally.

Our modern slavery working group is now a global team encompassing participants from Australia, Singapore and more recently, New Zealand. The working group enables participants to share information internally and apply our approach uniformly across our different business units and when working with external stakeholders.

### Collaborative Engagement with Suppliers

Ampol markets a diverse group of products across a varied customer group. Ampol's customers range from everyday consumers purchasing fuel, food and groceries within its convenience retail network through to large corporate customers purchasing bulk fuels and lubricants.

Ampol sources a wide variety of product spanning fresh fruits & vegetables, transport fuels, fast food, batteries, industrial chemicals, personal hygiene products and fish bait. As a consequence, Ampol partners with an array of suppliers – locally and internationally. Some of Ampol's suppliers are small local businesses and others are large multinational corporations.

Ampol requires that all suppliers agree to Ampol's modern slavery terms and agree to support the principles within the Ampol Supplier

Code of Conduct. Where suppliers are unable or unwilling to agree to the Ampol Supplier Code of Conduct, Ampol will require that the supplier has an equivalent code of conduct or otherwise provide evidence that demonstrates equivalent policies or procedures to mitigate modern slavery risks.

Ampol's modern slavery terms, amongst other things, require that suppliers will not engage in modern slavery and will promptly report and remediate instances of modern slavery discovered in their businesses or supply chains. Ampol recognises that a one size fits all approach to all suppliers is not always practical. Ampol works collaboratively with suppliers to agree to amended or alternative terms that meet Ampol's modern slavery objective yet also maintains practical measures having regard to the nature of the supply.

## Ampol values

**The Ampol Values underpin everything we do.** In particular, the Ampol Value of *Never Stop Caring* encourages us to always do the right thing and have a positive impact on the communities and economies in which we operate. Ensuring that no modern slavery exists within our operations and supply chains is a critical action that supports this value.



### Connect to win

We collaborate as an integrated business to drive growth.



### Find new ways

We innovate to deliver positive outcomes.



### Own it

We make bold decisions and are accountable for the outcomes.



### Make a difference for customers

We are connected to our customers and solve their changing needs.



### Never stop caring

We keep safety first and make a positive contribution to those around us.

## Our structure

*Ampol Limited is an independent Australian company and a regional leader in transport fuels.*

### Simplified structure chart



- Reporting entities (as defined in the Act) making this joint Modern Slavery Statement
- Owned and controlled entities covered by this joint Modern Slavery Statement
- Additional investments not covered by this joint Modern Slavery Statement

### Ampol Limited and the Ampol Group

Ampol Limited is the Australian Securities Exchange (**ASX**) and New Zealand Exchange (**NZX**) listed parent company of the Ampol Group, comprising approximately 70 controlled entities. For a full list of controlled entities, see Ampol's 2023 Annual Report.\*\*

Ampol Limited is incorporated in Australia with its registered office at 29–33 Bourke Road, Alexandria, NSW 2015.

### Subsidiary reporting entities

**Ampol Australia Petroleum Pty Ltd** is a wholly-owned subsidiary of Ampol Limited and the main operating entity for the Ampol Group.

**Ampol Retail Pty Ltd** is a wholly owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol's Convenience Retail business.

**Ampol Petroleum Distributors Pty Ltd** is a wholly owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol's national depot network and associated truck fleet within the Fuels & Infrastructure Business Unit.

All three subsidiary reporting entities are incorporated in Australia.

### Additional investments

Ampol also holds additional investments in a number of associates and joint ventures as set out at Note F5 of Ampol's 2023 Annual Report. This statement does not cover actions taken by these associates and joint ventures that Ampol does not control.

\*\* Note F1 to the Financial Statements.



## Our operations

### Powered by connection

An independent Australian company, Ampol is the Trans-Tasman leader in transport energy.

Ampol's market position is unmatched in the Australian and New Zealand transport fuels market. Our competitive strengths lay with our strategic assets, supply chain expertise, deep customer base and iconic brands.

Our ability to service our broad customer base is supported by our robust supply chain and strategic infrastructure positions. In Australia, this includes 15 terminals, six major pipelines, 53 wet depots, 1,790 Ampol-branded sites (including 636 company-controlled retail sites) and one refinery located in Lytton, Queensland.

In New Zealand, there are nine terminals and 461 sites (includes Z Energy and Caltex branded sites).

This network is supported by more than 9,000 people across Australia, New Zealand, Singapore and the United States of America (USA).

### Keeping customers moving with the right fuel in the right place

Over the past decade, we have been growing our international presence, culminating in the acquisition of Z Energy in 2022. In 2023, international earnings contributed approximately 30% of Ampol's earnings.

Our ability to service a broad range of customers ensures we have an important role to play in supporting our customers through the ongoing energy transition. Our integrated business generates strong cash flows and provides a strong foundation to invest in the energy transition in a disciplined manner.



*We operate a portfolio of strategic assets across key demand centres and leading branded retail networks throughout Australia and New Zealand.*

- 1 Singapore**  
 Ampol's Trading and Shipping business was established in 2013 to source crude and petroleum products from global markets and leverage our privileged infrastructure.
- 2 Philippines (20% owned)**  
 Strategic partnership with Seoail.
- 3 Australia**  
 Serving retail and business customers for over 100 years.

- 4 New Zealand**  
 Owner of Z Energy, one of New Zealand's largest transport energy companies. Ampol also owns 12.6% of Channel Infrastructure in New Zealand via its ownership of Z Energy.
- 5 United States of America**  
 Houston-based Trading and Shipping office, which commenced trading in October 2020.

## Our operations continued

### Principal activities

#### Fuels and Infrastructure



#### **Our Fuels and Infrastructure business sources, imports, refines and distributes fuels and lubricants to a diverse customer base.**

With capability and scale across the transport energy supply chain, we are leading operators in Australia and New Zealand, and a challenger in the Asia and United States regions.

Our capability in product sourcing, peerless infrastructure and network assets, coupled with our deep customer relationships, allows us to run an integrated business and to drive value from international sourcing through to wholesale supply of fuels and lubricants.

Our Fuels and Infrastructure business successfully navigated a significant outage at the Lytton Refinery during 2023. Notwithstanding the outage, we were able to maintain the supply of product to our customers, demonstrating the resilience of our people and business overall.

**~80,000\***

B2B customers

**28.4BL**

2023 total sales volume\*\*

#### Convenience Retail



#### **Our Convenience Retail business directly operates a network of sites in Australia to deliver fuel, lubricants and a range of convenience and essential products to millions of customers every week.**

Through new formats, products, technology, and services, we are redefining what convenience means for Australians. Our national network of 636 company-controlled sites delivers customers a premium fuel and card offer through Amplify Premium Fuels and AmpolCard, with a growing convenience offer that is disrupting the Australian market.

In 2023 Convenience Retail launched its highway upgrade strategy which included the opening of the newly constructed Pheasants Nest and upgraded M1 Northbound sites in NSW. Convenience Retail also commenced a Quick Service Restaurant (QSR) trial which involved operating two Hungry Jack's stores in NSW.

**~3 million**

weekly customers at our company-controlled network

**636**

company-controlled retail sites

**1,790**

sites in brand and AmpolCard accepting network, largest in Australia

\* Australian customers of the joint reporting entities.

\*\* Across the entire Ampol business.

## Our operations continued

### Principal activities continued

#### Future Energy



**Our Future Energy business leverages our existing transport product offers backed by over 100-years of keeping customers moving.**

#### Supporting EV uptake

Ampol's aim is to build Australia's leading e-mobility brand, leveraging our position as the country's largest branded fuel and retail convenience network.

During 2023, Ampol announced a partnership with Mirvac where the first AmpCharge EV chargers will be installed outside of the Ampol retail network.

In 2023, Ampol continued with the execution of our Future Energy and Decarbonisation strategies. From five pilot sites comprising of 12 AmpCharge charging bays, Ampol now has more than 36 sites with 82 AmpCharge charging bays across its network. Ampol aims to have 300 AmpCharge charging bays across 100 charging sites by the end of 2024.

At our new Pheasants Nest sites in New South Wales (both North and Southbound), we have built 12 charging bays to serve our customers on long journeys up and down the Hume Highway.

During 2023, Ampol commenced a program installing ~50kW solar panels to supplement the grid energy consumption at our owned and operated sites and we have commenced a small trial of battery storage integration to support retail and EV energy consumption.

#### Renewable Fuels

Ampol is exploring the feasibility for a renewable fuels manufacturing facility at our Lytton refinery. The Brisbane Renewable Fuels project includes the use of agricultural, animal and other waste feedstocks to produce renewable fuels for domestic and export use. The supply chain would likely include a reliance on feedstocks that are prevalent in the Queensland agricultural market.

82

AmpCharge charging bays in Australia

### Commitment

to build 300 AmpCharge EV bays by the end of 2024

#### Z Energy



**Z is one of the leading transport energy companies in New Zealand, running a network of commercial refuelling stations, retail service stations and bulk fuel storage terminals across the country.**

2023 saw the first full year of operations since the completion of Ampol's acquisition of Z Energy in May 2022.

Alongside the Z service station network of 189 Z-branded service stations, Z is also a bulk fuel supplier to 130 Caltex-branded service station network and 142 truckstops across New Zealand.

By the end of 2023, Z shifted its contracted fuel import requirements into the Ampol supply function, realising further supply chain efficiencies and economies of scale, and further supporting New Zealand's fuel security.

Z Energy is also expanding its EV charging network to meet the forecast demand of electric vehicles sales in New Zealand over the coming years. Numerous projects and partnerships are underway to ensure emerging technologies are best suited to the needs of our customers.

~1 million

weekly customers across all sites

104

electric vehicle charging bays across 37 sites

9

terminals operated by Z Energy

40%

of New Zealand's bulk fuel terminal storage by volume

## Our team

# 9,115 employees

As at 31 December 2023

### Employment status



### Located



### Female representation

Female representation at senior leadership level

40%

Female representation overall

42%

Female representation on the Ampol Board

33%

1.3% like-for-like gender pay gap in favour of males, and 13.7% overall gender pay gap in favour of males across all of our locations \*\*



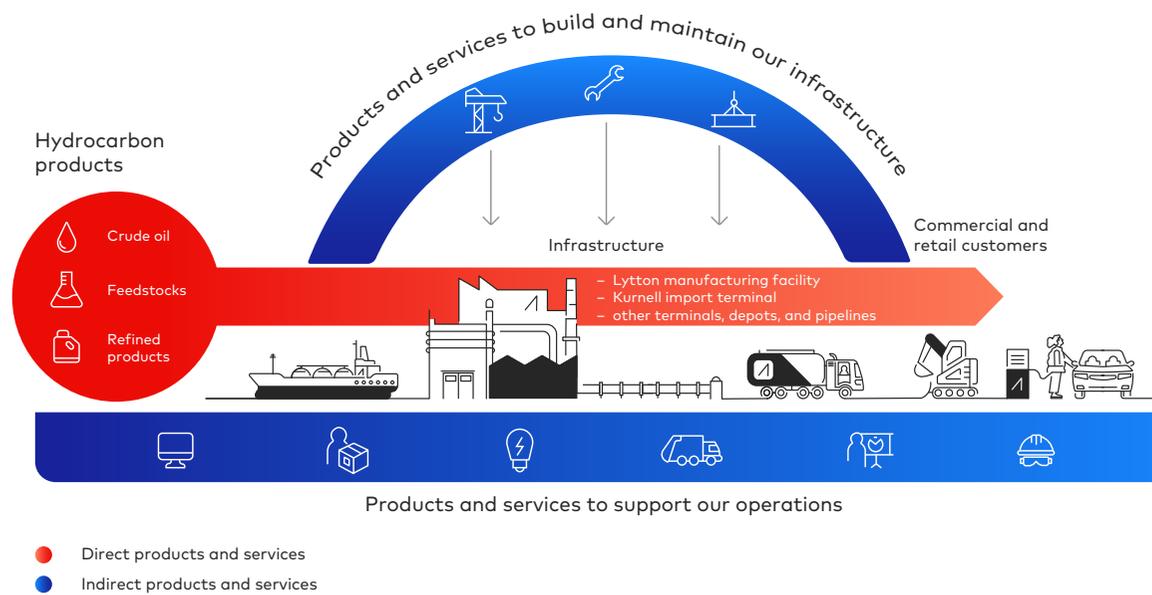
\*\* The Workplace Gender Equality Agency (WGEA) recently published employer gender pay gaps by mean, and median. These figures apply exclusively to workforces based in Australia. The WGEA data can be obtained from [wgea.gov.au](http://wgea.gov.au).

## Our supply chains

Ampol's supply chains include direct products and services for sale to customers, and indirect products and services to support our operations.



### Fuels and Infrastructure supply chain



Ampol's Fuels and Infrastructure goods and services supply chain starts with the sourcing of hydrocarbon products locally and overseas (crude, feedstocks and refined products, including lubricants).

These products are then shipped or distributed:

- directly to Australian and international business customers (including Z Energy);
- to the Lytton refinery for processing; or
- to our broad network of assets (including the Kurnell import terminal, other terminals, depots and pipelines) for storage, distribution and sale in our retail business or to our business and commercial customers.

In Australia, Ampol operates 15 terminals, six major pipelines, and 53 wet depots. In New Zealand, Z Energy operates nine terminals.

Ampol's Fuels and Infrastructure supply chains also include the procurement of products and services to build and maintain our infrastructure (for example, industrial painting, electrical and mechanical services), and support services and products (for example, logistics, IT infrastructure, PPE, waste management services and professional services).

The Ampol Fuels and Infrastructure supply chains apply to all reporting entities covered by this statement.

## Our supply chains continued

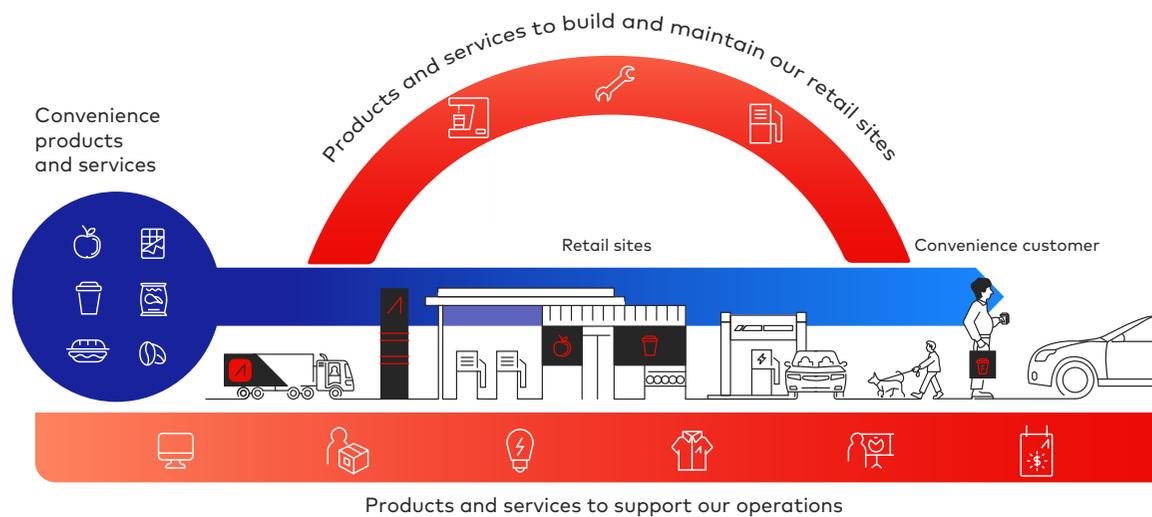
### Convenience Retail

Ampol's Convenience Retail goods and services supply chain includes the sourcing and distribution of convenience products and services for sale to customers (this includes food ingredients for onsite assembly), the procurement of products and services to build and maintain our retail sites (for example, pump systems, electric vehicle infrastructure and shop fittings) and support services and products (for example, logistics, uniforms, IT infrastructure and marketing).

As at 31 December 2023, Convenience Retail had approximately 123 ongoing trade suppliers (excluding fuel products).

- All 123 suppliers have completed the Ampol pre-questionnaire (prior to becoming a supplier) and a separate risk assessment as part of the supplier onboarding process.
  - 17 suppliers were characterised as medium risk primarily due to the nature of the industry. For example, farming, cocoa and fishing.
  - The remaining 106 suppliers were rated as low risk.
- Of the 17 medium risk suppliers, nine maintain modern slavery or similar code of conduct policies and statements and reporting practices due to their size.
- In addition to the 123 ongoing trade suppliers, Ampol sources fresh produce (including fruit, vegetables, meat and bread) from a variety of local suppliers and markets. These suppliers have been categorised as high risk due to the variety of suppliers and the nature of the industries involved.
- Ampol conducted 11 site visits to ongoing trade suppliers in 2023, including three suppliers within the medium risk category.

### Convenience Retail Supply Chain



### Quick Service Restaurants

Ampol's growing Quick Service Restaurant (QSR) business includes both Hungry Jack's and Boost Juice offerings. The QSR business primarily sources its food ingredients from agreed suppliers with the franchisor. Both Hungry Jack's and Boost Juice separately provide modern slavery statements which are accessible on the register and describe their supply chains and associated risks. Ampol has relied on the modern slavery statements of its franchisor partners for the preparation of this statement.

In the case of Hungry Jack's, Ampol sources its dry goods and frozen products from the Hungry Jack's distributor under a franchise agreement. Subject to the franchise agreement, Ampol sources its bread products from Australian-based bakeries and dairy products from Australian-based dairy businesses, which are in turn sourced from farmers and processed locally. Other branded foods (syrops, water, coffee beans and café syrups) are sourced from a variety of local and international brands that operate in Australia.

In the case of Ampol's Boost Juice offering, Ampol orders frozen ingredients, dry goods and packaging from Boost approved suppliers. Fresh fruit and vegetables in the Boost category are ordered through wholesalers selected by Ampol who source their supply from local (Australian) growers and farmers.

For its QSR business, Ampol has identified the agricultural supply chain as a modern slavery risk.

The Convenience Retail Supply chains described in this statement apply to the Ampol Retail Pty Ltd reporting entity and the Ampol QSR Pty Ltd owned entity.

## Our supply chains continued

### Future Energy

*During 2023, Ampol has continued to build upon its e-mobility strategy, which includes the rollout of EV chargers across its retail network and into third-party sites. This forms part of broader Ampol strategy to build a national charging network that will assist in minimising range anxiety for EV owners and support EV uptake.*

As at 31 December 2023, Ampol had a total network of 186 EV charging bays across Australia and New Zealand.

- 82 charging bays in Australia.
- 104 bays in New Zealand.

Ampol's target is that by the end of 2024 it will have:

- 300 charging bays at more than 100 sites in Australia, and
- 150 charging bays in New Zealand.

The supply chain to build the infrastructure includes:

- Sourcing appropriate e-mobility charging equipment and associated site infrastructure, and
- The installation/build of the sites which requires specialist labour, and a potential for third-party labour (i.e. the use of contractors).



## Our supply chains continued

### Z Energy

*Z Energy's supply chains can be simplified into three distinct parts relating to the supply and distribution of:*

- refined fuel and the products and services that support the delivery of refined fuel and related products. This includes lubricants to our customers via our Retail network of service stations and truck stops, and refined fuel to wholesale customers/competitors via our bulk fuel terminals
- convenience retail products for our Retail sites and products and services that support our corporate operations
- low carbon products and associated services. This includes electric vehicle (EV) charging infrastructure for Z's expanding EV charging network.

### Supply and distribution

Refined product is imported by tanker either to Channel Infrastructure or directly to ports around the country. Channel Infrastructure operates the Terminal to Auckland Pipeline (TAP), a 170 kilometre underground multiproduct pipeline which transfers industry refined product to Auckland.

Z directly owns and operates nine bulk fuel storage terminals across Aotearoa New Zealand, with total storage representing just over 40 percent of the country's tankage. Product is distributed in smaller amounts from Z's bulk fuel terminals by road tankers and pipelines to retail service stations and truck stops. We also sell fuel to wholesale customers/competitors from our bulk fuel terminals.

### Customers

Z provides product such as aviation fuel to airlines; marine fuel oil to the shipping and fishing industries and diesel for trucks and tractors.

Z has the largest truckstop network in the country with 142 sites. In 2023, Z also provided fuel to customers through its network of 189 Z-branded and 130 Caltex-branded service stations.



## Modern slavery risks and practices

*As Ampol moves into new areas of business, we need to continue to be dynamic in our approach to identifying key risk areas within our supply chains and areas for prioritisation.*

In 2023, we made significant steps in our Quick Service Restaurant (QSR) strategy through our Hungry Jack's branded sites. This is in addition to our expanding Boost Juice offerings. The supply chain associated with these new businesses contains different risk factors than those in our traditional transport fuels businesses.

The same is true with our Future Energy business. Ampol's supply chain now includes solar panel manufacturers, but also different original equipment manufacturers, for example for e-mobility solutions. These supply chains present different modern slavery risk compared to that of transport fuels.

By reason of the complexity of Ampol's supply chains and the modern slavery risks that they present, Ampol continues to maintain a detailed modern slavery risk assessment process, which can operate across all our Australian business units and enables us to identify areas of concern.

The modern slavery risk assessment process utilises established risk indicators and indices (such as the United States Department of Labor 2018 list of goods produced by child or forced labour and the Global Slavery Index 2018) to identify where there are potential modern slavery risks in our operations and supply chains.

Following the risk assessment, and for any proposed supplier that is not considered low risk, Ampol then requires proposed suppliers to complete a Self-Assessment Questionnaire (SAQ). The material returned from the proposed supplier is then subject to a review of the supplier's:

- own modern slavery statement (or equivalent material);
- internal policies; and
- evidence to support the SAQ responses.

Ampol will then seek further information where necessary to understand the modern slavery risk of a proposed supplier.

Having identified the potential risk, Ampol will continue to ensure due diligence by way of a series of ongoing deep dives for existing suppliers. Selection of ongoing risk assessments in 2023 was based on spend and risk profile.

### Our risk assessment has identified several potential risks of modern slavery practices in Ampol's operations and supply chain, arising through:



#### Procurement of high-risk products for resale or to support business operations:

- Examples include coffee purchased for resale at Ampol retail stores; and electronics used by Ampol employees



#### Procurement of high-risk services:

- For example, cleaning services at Ampol sites



#### Interactions with high-risk industries for example:

- Shipping, with Ampol regularly chartering vessels to move its crude, feedstocks and refined products;
- Agriculture, with Ampol selling biofuels which include agriculture feedstock and fruit & vegetables at its retail stores; and
- Construction of Ampol retail sites.



#### Reliance on vulnerable workers for example:

- Foreign visa holders in both Ampol controlled and non-company controlled retail sites;
- Young workers at Ampol's QSR sites; and
- Family and other small businesses suppliers with smaller local suppliers (for example fish bait) where there is less rigour and formality in the employment relationships.



#### Use of high-risk business models for example:

- The use of guard services procured through third-party labour-hire arrangements at Ampol sites; and
- The use of base-skilled construction labourers, also procured through third-party labour hire arrangements in significant construction projects.



#### Procurement from high-risk countries for example:

- The purchase of uniforms manufactured in China and Vietnam, which are products classified as 'at risk of modern slavery' in the Global Slavery Index;
- The purchase of cocoa-based products from large multinationals where the product is farmed in West Africa with a potential for child labour risk;
- Sourcing EV chargers from multiple providers which are manufactured in high risk countries; and
- Chemicals sourced from international suppliers.

## Modern slavery risks and practices continued

### *Z Energy's approach to modern slavery is aligned to the three values of Tū Kaha/Stand out, Tū Māia/Speak Up and Tū Kotahi/Side by Side.*

Since the acquisition of Z Energy in 2022, Ampol and Z have integrated many of their functions including the transport fuels supply chain. Due to the similarity in business operations, the risks of modern slavery at Z Energy are similar to that of Ampol's operations in Australia.

### Risks of modern slavery that exist at Z include

#### Higher risk business models

- Z does not directly operate retail sites. Within this model, there are vulnerable worker risks within the operator businesses. This includes an exposure to issues associated with working visa holders and compliance with workplace laws.
- In Bulk Fuels, Z engages some workers through third party contractual arrangements (labour hire).

#### High Risk Products & Sourcing Risk

- The Z Energy Retail Network retails similar products to the Australian Convenience Retail business. This includes agricultural products, electronics and products from higher risk industries.
- For its Z Energy sites, Z performs the shop procurement and has oversight with Caltex-branded sites, individual operators separately procure the supply for their shop products. This gives rise to modern slavery risk due to the opaque nature of the supply chain itself.

### Case Study

#### Human Rights and Labour Group Standard

Ampol made the commitment in its 2022 Modern Slavery Statement to review its Human Rights Policy during the 2023 year.

The 2023 review identified the need for the development of specific labour standards to support the intent of the Human Rights Policy with respect to employees directly engaged by Ampol.

Supporting the Human Rights Policy which refers to certain international standards, the new standard will operate to prescribe internal procedures to put the international standards into operational practice.

The new Group Standard is intended to be drawn directly from the 10 Principles of the UN Global Compact (see [www.unglobalcompact.org](http://www.unglobalcompact.org)) of which Ampol is a continuing member.

During late 2023, work commenced on the drafting of the Group Standard which will regulate:

- minimum standards with respect to recruitment practices;
- use of recruitment agencies;
- the engagement of juniors;
- the management of worker identification and migration documentation;
- compliance with labour laws and regulation;
- freedom of association; and
- human rights in offboarding processes.

By way of example, the Group Standard will provide specific instruction to the Ampol People & Culture team and operational personnel in the context of the industry in which it operates. In the case of junior employees, the standard will require that juniors are not to be engaged in hazardous work which includes work at refineries, terminals and other such facilities.

Ampol has set a future action to implement the new Group Standard during 2024 and conduct necessary training within its People & Culture team to support the implementation across the Group.



## Modern slavery risks and practices continued

*We maintain a robust corporate governance structure to mitigate modern slavery risks.*

### Governance

We believe adopting a high standard of corporate governance is essential to ensuring modern slavery risks are appropriately managed at Ampol. The following governance structure supports the management of modern slavery risks at Ampol.

#### Ampol Board

Responsible for corporate governance policies and risk management, including those relevant to modern slavery. Approves relevant policies for publication on the Ampol website and Ampol's Modern Slavery Statement.

#### Board Safety and Sustainability Committee

Oversees the implementation of Ampol's modern slavery response program.

#### Ampol Executive Leadership Team (ALT)

Monitors progress of the modern slavery response program.

#### Legal and governance

Works across the business to coordinate and support delivery of Ampol's modern slavery response program.

Further information on Ampol's corporate governance framework, practices and policies is outlined in our Corporate Governance Statement which is available on the [Ampol website](#).



## Modern slavery risks and practices continued

### Our policies and expectations

#### Corporate Governance Statement

Ampol is committed to acting lawfully, ethically and responsibly, which plays a critical role in our success as an organisation and our ability to generate shareholder value.

#### Ampol values and Code of Conduct

Ampol's approach to modern slavery risks is underpinned by the Ampol values.

The Ampol Code of Conduct defines the standards of conduct and behaviour expected from all employees, directors and officers of the Ampol Group. Ampol also expects external parties, including suppliers and customers, to act in accordance with our code. The code sets the foundation which defines Ampol's expectation of its people and includes a firm commitment to supporting the fundamental principles of human rights as expressed in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

The Ampol Code of Conduct confirms Ampol does not tolerate any form of slavery or child labour, including forced labour, and acknowledges that in order to respect human rights, Ampol needs to manage any adverse human rights impacts which we may cause or to which we may contribute or be linked.

*The Ampol Code of Conduct can be accessed on the Ampol [website](#).*

#### Ampol Supplier Code of Conduct

Our respect for human rights provides the basis for our expectations of ourselves and for our counterparties. These expectations are set out in the Ampol Supplier Code of Conduct (**SCoC**) and include Ampol's expectations around labour and human rights. This includes the expectations that counterparties will:

- Ensure all work is freely chosen without the use of modern slavery, including forced or compulsory labour;
- Ensure workers are of legal age, preventing any form of child labour;
- Pay their workers lawful wages; and
- Provide fair working conditions for employees.

The principles outlined in Ampol's Supplier Code of Conduct apply to all third-party suppliers, contractors, trading and business partners and service providers (suppliers) and their employees who transact with or provide any goods or services to Ampol.

*The Ampol Supplier Code of Conduct can be accessed on the Ampol [website](#).*

#### Ampol Human Rights Policy

Ampol has enshrined its commitment to conducting its business in a manner that respects human rights in its Human Rights Policy. The Ampol Human Rights Policy calls out focus areas where respect for human rights is most critical to the way we operate including:

- Considering human rights and setting minimum expectations as part of sourcing and purchasing decisions; and
- Providing a safe, secure and inclusive work environment free from discrimination, bullying and harassment, together with fair pay and labour conditions.

*The Ampol Human Rights Policy was reviewed in 2023. An updated version following that review can be found on the Ampol [website](#).*

#### FUTURE ACTION

During 2023, Ampol reviewed its human rights policy. Ampol identified an opportunity to implement a Human Rights and Labour Group Standard. During 2024, Ampol will deploy the standard across the business.

The draft standard (as at the date of this statement) is intended to be guided by the 10 Principles of the UN Global Compact and incorporates six of those principles which relate to matters of modern slavery.

#### Z Energy

The Z Energy Code of Conduct is designed to help guide and inform the choices that staff at Z Energy make on a daily basis and ensure they do the right thing. The Z Energy Code of Conduct helps staff to succeed through making choices that are consistent with our values and policies.

Separately, the Supplier Code of Conduct (**Z SCoC**) for Z Energy Group is embedded in all of Z's standard supplier agreements. The objective of the Z SCoC is to set clear expectations of all our suppliers regarding ethical, social and environmental business practices. The Z SCoC provides a framework for meaningful and collaborative partnerships that ultimately work to enhance our communities, increase efficiency and reduce our environmental impact together.

#### FUTURE ACTION

During 2024, and continuing to integrate the operations of both Ampol and Z, Ampol will commence a process to review both Codes of Conduct with a view to make recommendations regarding the consolidation of each document.

## Modern slavery risks and practices continued

### Supplier engagement

#### Ampol Supplier Code of Conduct compliance

The Ampol Supplier Code of Conduct (**Ampol SCoC**) sets out the minimum expectations of counterparties across the key areas of labour and human rights, diversity and inclusion, health and safety, environment and sustainability, and ethical procurement. In 2019, Ampol commenced proactive engagement with suppliers to assess their compliance with the expectations set out in the code through a supplier questionnaire administered via Ampol's supplier risk management platform.

The Ampol SCoC questionnaire allows Ampol to obtain information directly from a proposed supplier and to identify gaps in a counterparty's ability to comply with the expectations set out in the code and address these gaps.

This questionnaire remains a mandatory step in our supplier onboarding process and with continued focus in 2023, 85% of Ampol's existing supply base,\* by spend, have now completed the questionnaire, exceeding prior commitments of 80%.

Ampol continues the work commenced in 2019 and is presently seeking to improve its supplier assessment mechanisms, including technological platforms to identify risks in its supply chain at the time Ampol considers a supplier prospect.

During 2024, Ampol will introduce a new modern slavery risk platform which is intended to provide comprehensive information on both Ampol's and Z Energy's supply chains as well as enhanced due diligence reports on key suppliers. Work on implementing the system commenced in Q1 2024 and is expected to be complete by Q4 2024.

#### FUTURE ACTION

Ampol will continue to transition existing suppliers upon renewal of their contracts to updated precedents and clauses.

In addition to the Supplier Code of Conduct questionnaire process, during 2023 Ampol conducted a modern slavery risk assessment of its top 100 suppliers having regard to industry and location. This represented 70% of all spend (excluding retail). The assessment found that:

- One supplier would be considered high risk;
- 56 suppliers are medium risk; and
- 43 suppliers are low risk.

The risk assessment process considers the following information obtained directly from the supplier:

- Workforce information including number of workers, their engagement status (full time, part time, casual, seasonal or contracted through third parties).
- Evidence of past audits and certifications including social, ethical and environmental.
- Modern slavery policies, statements and any training conducted by the supplier on modern slavery matters.
- Detail as to how the supplier conducts due diligence for modern slavery risk including within their supply chains.
- The use of child labour including checks (if any) the supplier conducts both internally and including within their supply chains.
- Policies dealing with wage deduction, retention of employee personal documentation and security deposits.
- Information relating to contracts of employment, language used in contracts, worker accommodation, ability for workers to freely resign and workplace compliance including minimum wages and pay slips.
- Grievance management processes and policies including how workers may anonymously raise concerns regarding labour conditions.

Our expectations are communicated to suppliers through making the code available publicly, the Ampol SCoC supplier questionnaire, contractual agreements or when registering for tenders.

Since 2021, all new suppliers\*\* must acknowledge the Code during onboarding and complete the supplier questionnaire prior to onboarding.

*\*\*Within Ampol's retail business, proposed suppliers are separately assessed by way of a pre-questionnaire, retail supplier questionnaire and an online assessment. See page 22.*

#### FUTURE ACTION

During 2024, Ampol will implement an enhanced third-party platform to identify modern slavery supplier risk across both Australian and New Zealand corporate programs.

### Contractual clauses and tender questions

Ampol continues to require suppliers to agree to Ampol's precedent modern slavery terms. Where suppliers raise concerns with the terms, Ampol attempts to work with the supplier for a cooperative outcome. The contractual process operates as a further indicator of modern slavery risk.

The Ampol modern slavery terms includes requirements for supply chain suppliers to:

- Comply with modern slavery laws and not engage in modern slavery;
- Maintain relevant policies and procedures;
- Take reasonable steps to reduce the risk of modern slavery in the supply chain; and
- Assist Ampol with its due diligence procedures that are aimed at reducing modern slavery risk in its supply chains.

#### FUTURE ACTION

Ampol will continue to ensure that a minimum of 80% of our suppliers, when measured by spend, complete the Supplier Code of Conduct questionnaire. If high risk suppliers are identified we will engage with them specifically on the issue of modern slavery.

\* Excluding Convenience Retail shop procurement.

## Modern slavery risks and practices continued

### Continued focus on due diligence

*Ampol continues to operate in accordance with its Modern Slavery Risk Assessment and Mitigation Standard which was introduced in 2021. The Standard provides a framework for assessing and addressing modern slavery risks when purchasing goods and services.*

Ampol continues to make significant progress with its combatting modern slavery program, embedding due diligence procedures into the standard supplier pre-qualification process.

### Corporate Program

A major element of our program is the Supplier Code of Conduct Questionnaire. This document obtains relevant information from proposed suppliers to enable Ampol to assess the risks of modern slavery during the engagement process.

The questionnaire enables Ampol to consider the following risks:

- The location of the supplier and the use of offshore labour.
- Whether the supplier has its own supplier code of conduct or similar.
- Freedom of association.
- Wages and working hours.
- The extent to which the supplier has policies and action plans with respect to managing modern slavery risk.
- Diversity and inclusion.
- Bribery and corruption.
- Sanctions.
- Whistleblowing and grievance mechanisms.
- Child labour.
- Health and safety.

#### In 2023:

- 85% of new suppliers (excluding retail) acknowledged and accepted our Supplier Code of Conduct when commencing as a new supplier.
- Ampol has made it a policy to ensure that renewals and recontracts with existing suppliers will include contractual provisions relating to the supplier code of conduct and modern slavery obligations or an equivalent term as negotiated.



## Modern slavery risks and practices continued



### Retail Program

In Convenience Retail, Ampol deploys a number of assessment tools when engaging a new supplier or during the ongoing supply relationship\*. The assessment tools that are applied in each case depend on the nature of the industry and supplier. This includes:

#### Pre Questionnaire Assessment

The pre-questionnaire is an assessment tool for retail category managers to make an initial assessment of a proposed supplier early in the procurement process. The pre-questionnaire considers the industry (flagging already known high risk industries), geographic origin of the supplier, common employment constructs in those industries/locations and other factors that may provide an early indicator of risk.

The pre-questionnaire will then inform the extent to which further assessment tools are applied.

#### Retail Supplier Questionnaire

The supplier questionnaire is used to assess a broader range of criteria (including non-modern slavery criteria) for a proposed supplier. For modern slavery purposes, the questionnaire includes questions relating to working conditions, worker accommodation, child labour and grievance mechanisms.

### Online Assessment

The online assessment is an independent due diligence process conducted by Ampol which considers a range of available information about the proposed supplier. Prior instances of workplace breach or other modern slavery matters may arise during this assessment process. The online assessment also includes a review of any publicly available information regarding the supplier's modern slavery policies and statements.

In 2023, Convenience Retail conducted online assessments of 123 suppliers, of which 66 had some form of assessable published modern slavery statement (from Australian or other jurisdictions) or policies.

#### Site Visits

Ampol continues to conduct site assessment of supplier operations for those based in Australia. The site visits satisfy a number of areas of interest to Ampol from food safety to product quality but also operate as a risk identification opportunity for modern slavery risk purposes.

11 site visits were conducted on ongoing trade suppliers in 2023.

#### FUTURE ACTION

Ampol will continue to conduct site visits with selected suppliers in 2024 where modern slavery risk identification is a focus. Outcomes from the retail due diligence program will contribute to the selection of suppliers for site visits.

### Retail Supplier Questionnaire

Ampol has identified the supply of food in the agricultural industry as a modern slavery risk in Convenience Retail. Below is a sample of questions put to proposed suppliers for the supply of food which informs Ampol's risk assessment:

- What action does your organisation take if modern slavery practices are suspected?
- Are any original identity related documents of workers (e.g. passports, birth certificates, national identity cards) retained?
- Where accommodation is provided, are workers free to leave at will?
- Are workers free to lawfully resign their employment without restriction or penalty?

### Reasonable Steps

In addition to product supply chains, Ampol recognises the risks of modern slavery with its retail partners. As part of Ampol's Reasonable Steps Program, validation checks at franchise and associated sites in Australia continued to plan. See Page 24 for further detail on the program.

\* Different supplier assessment and management methodologies operate currently for operational and geographic reasons between Ampol retail suppliers and non-retail suppliers.

## Modern slavery risks and practices continued

### Risk area deep dives

Ampol continues to prioritise suppliers that are identified as part of the risk identification process for deep dives. The deep dive process uses a combination of some or all of the following:

- Detailed discussions with internal subject matter experts.
- Site visits of local suppliers.
- Detailed modern slavery questionnaires, administered via Ampol's supplier risk management platform.
- Meetings with suppliers to engage on the issue of modern slavery.
- Ongoing implementation of our Modern Slavery Risk Assessment and Mitigation Standard.

Insights from the deep dives are used to inform our approach to modern slavery risk and have allowed Ampol to identify additional mitigation steps. These additional mitigations steps include activities such as targeted training, changes to the reasonable steps program and the use of modern slavery contractual clauses.

### Deep dives undertaken in 2023

During 2023, six deep dives were completed on high risk suppliers.

The deep dives and detailed modern slavery questionnaires have provided Ampol with better visibility allowing us to identify those higher risk suppliers where additional assistance or monitoring is required. Ampol has worked with these suppliers to engage specifically on the issue of modern slavery, and in some instances has previously initiated third party audits of suppliers' businesses to validate the controls they stated they have in place.

#### FUTURE ACTION

The modern slavery risk assessment has been embedded into our corporate supplier prequalification process and it will continue to be mandatory for all new suppliers to be assessed on potential modern slavery risks. Ampol commits to continuing deep dives on suppliers as assessed by risk with the benefit of new platforms and tools.

### Case Study Deep Dives

In the case of an industrial chemical supplier to Ampol, the deep dive involved a request by Ampol for further information regarding the supplier's modern slavery training and its processes relating to forced labour. The supplier furnished Ampol with information relating to its training package including delivery methodology and detail regarding how the supplier deals with employee documentation and recruitment practices.

In the case of a building services supplier to Ampol, Ampol's deep dive resulted in the supplier providing a third-party independent scorecard. This provided Ampol detailed information relating to the human rights and business ethics outcomes of an audit. By reason of the deep dive, Ampol obtained visibility on certifications and policies that applied at the supplier and a weighted scorecard indicating strengths and areas for improvement.



## Modern slavery risks and practices continued

### Specific risk mitigation for targeted higher risk areas

#### Entry-level workers at Australian non-company controlled sites

While not directly part of our operations, Ampol recognises the potential risk of exploitation of base-skilled workers employed as shop assistants (Console Operators) throughout our associated retail sites, which are not company controlled. This workforce includes vulnerable workers such as foreign students with limited working rights, and migrant workers who may have limited understanding of their rights or how to enforce them.

Whilst Ampol does not have direct control over the working conditions of employees within the extended network, Ampol has a workplace compliance program (Reasonable Steps Program) whereby Ampol takes steps to help ensure fair and legal treatment of workers employed throughout our associated retail sites.

Within Ampol's non-controlled network in Australia, the Reasonable Steps Program includes:

- Contractual obligations to comply with workplace laws;
- Workplace compliance audits;
- A phone advice line where franchisees can call and get free advice on workplace compliance and related matters on a confidential basis; and
- Access to a dedicated hotline for employees wishing to confidentially raise wage or visa non-compliance (including the ability to raise concerns anonymously).

Since the program commenced in 2019, approximately 439 sites have been audited, and appropriate remediation action taken where issues were identified.

#### Franchise Sites

Since 2018, Ampol has been transitioning franchise sites to company operations, which has resulted in a significant reduction in the risk of exploitation within this part of the network.

At the end of 2022, five franchise sites remained, and at the end of 2023, only four sites remained.

All four franchise sites remaining were audited again in 2023. Ampol commits to continuing an audit program to maintain the standards that have been set.

#### FUTURE ACTION

During 2024, Ampol will engage a qualified third-party provider to deliver quarterly information and training sessions to associate site operators which will cover minimum terms and conditions of employment and other human rights obligations of employers. The sessions will be wholly funded by Ampol and access to the sessions will be appropriately advertised for all associated site operators.

#### Associated sites (other than franchise sites)

During 2023, Ampol engaged its independent auditors to conduct:

- 22 audits in its dealer network.
- Three audits in its distributor network.

#### FUTURE ACTION

In 2024, Ampol will continue its practice of auditing at least 10% of Australian associated sites for workplace compliance.

#### FUTURE ACTION

In 2024, Ampol will develop a Dealer Code of Conduct which sets Ampol's minimum expectations within the dealer network including workplace compliance, human rights and health & safety.

#### Case Study

#### Reasonable Steps Compliance Audits

Ampol has engaged third-party auditors to audit both franchise and associated sites. An aim of these audits was to assess the effectiveness of the reasonable steps measures put in place to deal with modern slavery risk. For example, where Ampol has provided support and information to its retail franchisees and associates, independent audits would then enable an assessment of the effectiveness of that support.

Third-party audits include the following assessed criteria:

- Record Keeping – this involves an audit of payslips and other employment documentation to audit record-keeping obligations under the Fair Work Act and Fair Work Regulations.
- Visa Compliance – by reason that the industry often involves a large proportion of student labour (offering casual and part time work) and the vulnerability of this cohort to exploitation, Ampol ensures audits include checks to monitor compliance with migration law. This includes ensuring that employees are engaged in accordance with relevant visa conditions.
- Payroll Review – audits consider the payslip and roster evidence and compares against the minimum terms and conditions for the classification under the industrial instrument. This usually includes a review of earnings against the requirements of the Vehicle, Repair, Services and Retail Award 2020. The audit considers base rates of pay, penalty rates, loadings, allowances, overtime and other award conditions.

- Superannuation – audits involve a calculation of the expected superannuation payable to employees based on the classification and employment type and as against the rostered hours.
- Leave Entitlements – audits involve an assessment to ensure employees accrue relevant entitlements at the appropriate rate including annual leave, personal leave and long service leave.

The progress of audits conducted within the reasonable steps program are reported to the Reasonable Steps Steering Committee. In the event of a significant material finding of non-compliance which is unable to be resolved, Ampol may take steps to terminate its relationship with the third party, and would report such actions to the board in the ordinary course.

Where non-compliance has been identified, Ampol or the auditor will engage in discussions with the site operator with a view to have the matters remediated. For example, where payroll errors have occurred, Ampol expects operators to take steps to ensure back payments are made and requires evidence accordingly. Ampol will also provide relevant support to the third-party operator to ensure relevant payroll and administrative processes and practices are improved moving forward.

## Modern slavery risks and practices continued

### Seafarer welfare

*Ampol is heavily reliant on shipping and seafarers to move its crude, feedstocks and refined products. In recognition of seafarers' particular vulnerability to exploitation, Ampol utilises a vessel-vetting process to ensure counterparties moving our crude, feedstocks and refined products by ship provide fair and safe working conditions for their crew.*



The welfare of seafarers continues as a modern slavery priority, and we continue to ensure we monitor any guidance notices issued by the Australian Maritime Safety Authority (**AMSA**) to ensure seafarer health and wellbeing.

In response to AMSA's guidelines, Ampol remains vigilant and continues to maintain due diligence steps to ensure it is understood how long each crew member has been on board a ship. For any crew member approaching 11 months of continuous service, Ampol will query their repatriation plan.

Ampol will not charter a vessel if it cannot ensure their practices are in line with Ampol's human rights and modern slavery policies.

In 2023, Ampol's Marine Assurance Team performed 1,184 assessments. Two vessels were rejected for reasons relating to crew experience/capability and three additional vessels were rejected for technical safety concerns. No vessels were rejected in 2023 for reasons linked to modern slavery-like practices. In 2022, Ampol rejected one vessel because a crew member had been on board for an excessive period; in 2023 Ampol did not identify the same issue with any of its vessels.

Ampol's vessel rejection rate is relatively low by reason of the standards Ampol applies throughout its chartering process. Vessel operators with lower standards of compliance in all areas (including modern slavery) are often avoided prior to any engagement by reason of the diligence applied at the early stages of the process.

Ampol's ongoing identification and mitigation of modern slavery risk in its trading and shipping operations include:

#### World Check/PurpleTrac

Using World Check and PurpleTrac (third-party due diligence screening tools), all vessel owners are screened for instances of adverse media or litigation (including those relating to modern slavery) prior to onboarding, and on a continuous basis after being approved.

#### PSC inspections

Port State Control (**PSC**) reports (which check compliance with the Maritime Labour Convention 2006) from the previous 12 months are reviewed for all vessels to identify issues and avoid using vessels detained by the PSC due to unsatisfactory crew conditions.

#### OCIMF inspection reports

All vessels are checked for a current Oil Companies International Marine Forum (**OCIMF**) vessel inspection report, which focuses on safe operations and safety measures, including where these relate to the crew.

#### Industry engagement

Ampol continues to participate in industry dialogue to discuss labour standards, crew health and safety and how we, as consumers of maritime service, can contribute to a more sustainable and equitable shipping industry.

#### MLC certification

All vessels are checked for a current Maritime Labour Convention certificate, covering issues set out in the Maritime Labour Convention 2006, including protection at work, living conditions, employment, health, social security and related issues.

#### Financial standing

A significant risk for ship crew is posed in the event a vessel owner goes bankrupt and abandons the ship and its crew. Ampol conducts credit checks on all vessel owners to mitigate this risk.

#### ITF ship lookup

Administered by the International Transport Workers' Federation (**ITF**), the lookup provides a succinct overview of any concerns identified by the last ITF inspection conducted on board. Where an ITF inspection uncovers problems, including but not limited to low wages, sub-standard living conditions and general employment issues, clarification and further information can be obtained from the vessel's technical operator. The ITF lookup is not an industry-wide practice for vessel clearance and something Ampol elects to do to provide additional assurance.

## Modern slavery risks and practices continued

### Case Study

#### Marine Assurance

Ampol charters, on average, 400 vessels each year and is proud to be championing the cause of fair and safe working conditions for seafarers.

For every vessel proposed for our supply chain, Ampol's Marine Assurance Team conducts an assessment comprising technical, operational and welfare elements.

The welfare elements of the assessment covers:

- The recruitment and management of shore-based and vessel personnel, and
- The wellbeing of vessel personnel

#### Recruitment and Management

The Marine Assurance Team evaluates whether the vessel manager has adequate procedures in place to ensure that the crew have appropriate qualifications, experience and competence for the intended role. Fitness for duty is a key consideration and Ampol requires that vessel managers adhere to a defined frequency of medical examinations. Cross-cultural values, interpersonal skills and communication styles are important when putting together a crew that needs to work and live together on a vessel for an extended period. Our assessment includes whether the vessel manager factors these social aspects in recruitment activities.

The Marine Assurance Team also assesses the continuous training and skills development conducted by the vessel manager. Ampol will audit samples of the training course material periodically (which may include sitting-in on training sessions) to ensure that the content meets the minimum requirements of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (**STCW Convention**), or other applicable authority. The focus of the assessment is both occupational safety and crew competency.

#### Wellbeing

Ampol requires that vessels have adequate resources available for the wellbeing of the crew. Wellbeing covers diverse aspects of the quality of life onboard, including access to and quality of food, accommodation, hygiene, rest and recreation facilities, medical facilities and leave. We ensure that vessel personnel are complying with the STCW Convention requirements on manning levels and working hours.

In recent years, there is increased awareness and an emphasis on vessel managers to conduct health risk assessments. In addition to general factors such as noise, vibration and climate, Ampol is particularly concerned that the vessel manager has implemented procedures to manage exposure to cargo vapours and other hazardous materials. The Covid-19 pandemic has triggered a need for vessels to have in place appropriate quarantine facilities. These are all elements that Ampol considers in the wellbeing assessment.



## Modern slavery risks and practices continued

### Grievance mechanisms

Grievance mechanisms provide a direct channel of communication between individuals adversely impacted and Ampol.

They provide a way for Ampol to monitor whether our activities are causing, contributing, or directly linked to worker exploitation, and to address such adverse impacts if they are identified.

Ampol is committed to ensuring anyone coming forward with concerns based on reasonable grounds is treated fairly.

### Ampol's Grievance Resolution Policy

Ampol's Grievance Resolution Policy provides the mechanism for employees to raise workplace grievances, including issues relating to their working conditions, and have these issues addressed in line with the Ampol values and Code of Conduct.

### Whistleblower Policy

Ampol has a Whistleblower Policy which establishes a framework for Ampol to comply with obligations regarding whistleblowers, including legal protections provided by law for whistleblowers. The Whistleblower Policy is designed to protect and encourage our employees, and those external to Ampol with close knowledge of our operations (including employees of suppliers), to report misconduct, including behaviour that is unethical, corrupt or illegal, without fear of retaliation.

### Z Energy

Any staff or contractor of Z Energy Limited who becomes aware of a legal, regulatory, policy or other compliance issue, or a breach of Z Energy Limited's Code of Conduct, also have access to a dedicated whistleblower service.

### Ampol Hotline

Ampol's grievance mechanisms are supported by an independently run confidential hotline, which is open to Ampol employees, as well as individuals outside Ampol who have knowledge of misconduct relating to Ampol. The hotline allows reports to be made anonymously, and for such matters to be managed and documented securely. Reports made to the hotline trigger a process within Ampol to assess the report and take further steps, including investigation and remediation if appropriate.

Reports made to the Ampol Hotline are monitored and reported to the Executive General Manager, Group General Counsel, Regulation and Company Secretary and the General Manager, Group Risk and Audit on a monthly basis as well as the People & Culture Committee of the Ampol Board of Directors on a six-monthly basis.

### Continuous improvement

Ampol prioritises the protection and support of victims of modern slavery. We are committed to best practice corporate governance and regularly review our internal documents and processes. For modern slavery purposes, continuous improvement at Ampol is achieved through:

- The regularity and ongoing nature of our modern slavery working group;
- The ARMF and Enhanced Compliance Program;
- Ongoing reviews and reporting of employee and stakeholder grievance data and the learning opportunities the data presents;
- External engagement;
- Training data and feedback from participants; and
- This statement and the associated necessary development, consultation and approval processes.

Our Human Rights Policy Review of 2023 has resulted in a commitment to delivering on a Human Rights and Labour Group Standard during 2024. We will continue to use learnings from prior years to inform future action.

### Case Study

#### Grievance Mechanisms – Peakon

In 2023, Ampol introduced a new employee listening survey, Peakon. Peakon is primarily concerned with worker voice through the provision to Management of timely and regular employee feedback. The product identifies key words and terms used by employees and then flags any such concerns to Management whilst maintaining a contributor's confidentiality.

In addition to its primary purpose (employee engagement survey), Peakon also operates as a grievance mechanism and a further indicator for awareness of modern slavery risk, particularly when raising issues that employees may not feel comfortable in raising through any other avenue.

Where Peakon has identified a concern or risk, the key words are flagged and the People & Culture team may commence investigations to determine the source of the risk and where necessary, a plan for remediation.



## Modern slavery risks and practices continued

### Training

Ampol employees are trained on Ampol's Code of Conduct obligations and expectations every two years using a mandatory online training module.

All employees and contractors are required to acknowledge and agree to the Ampol Code of Conduct when onboarding. Breaches of the Ampol Code of Conduct can be reported through Ampol's People & Culture team, a person's manager or the Ampol Hotline, and are monitored and reported to the People & Culture Committee of the Ampol Board of Directors every six-months.

The Ampol Code of Conduct comprehensively covers and encompasses modern slavery, however additional groups of employees identified to be working in higher risk areas are required to undertake more detailed mandatory modern slavery training.

During 2023, Ampol implemented a new modern slavery online learning module across its Australian and international entities. The modern slavery course formed part of a mandatory group of compliance training modules. The new module was targeted at personnel who make supplier purchasing decisions, labour-related decisions or are key members of Management who may give effect to Ampol's commitment to eliminating modern slavery.

The new course includes the following content:

- Ampol's approach to modern slavery.
- Definitions and descriptions of modern slavery.
- Modern slavery facts, using data and case studies.
- Modern slavery high risk areas and goods and services.
- Why Ampol needs to understand its modern slavery risk.
- How Ampol is mitigating modern slavery in its supply chain.

During 2023:

- 203 employees (within the joint reporting entities) were identified and required to complete the modern slavery awareness training.
- More employees completed modern slavery training than all prior years combined.
- 98.5% of employees (of the joint reporting entities) who were assigned the training completed the module by 31 December 2023.

#### FUTURE ACTION

Ampol will continue to apply the modern slavery module as a Group compliance topic which is mandatory for all identified leaders or decision-makers who may be in a position to make a difference consistent with Ampol's modern slavery objective.



## Assessing effectiveness and consultation

We continually look to improve the measurements of effectiveness of our modern slavery program.

The Ampol Group assesses the effectiveness of the actions we take in a number of ways:

- **Governance:** Feedback and assessment from the Board, Safety & Sustainability Committee and ALT on the implementation and progress of Ampol's modern slavery response program. This has included engagement with subsidiary boards.
- **ARMF:** The status and effectiveness of control measures relating to modern slavery risks are assessed via Ampol's ARMF risk assessment process.
- **Policies:** Periodic scheduled reviews of relevant policies, including in relation to the Ampol Human Rights Policy which was conducted in 2023.
- **Supplier Code of Conduct compliance:** Monitoring the number of suppliers who acknowledge the Ampol SCoC, the number of suppliers who complete the Ampol SCoC supplier questionnaire and the number of verification assessments completed.

- **Audit:** The internal audit function through its strategic planning process, provides the Board and Management with an independent and objective assessment of the adequacy, effectiveness, and efficiency of Ampol's risk management, control and governance processes.
- **Modern Slavery Working Group:** The working group forms the core team that is responsible for delivering on the initiatives contained within each annual Modern Slavery Statement and is responsible for the drafting of the statement content itself. It is through the continuous process of objective setting, delivery, and reporting that assessment of effectiveness occurs.
- **Contract clauses and tender questions:** Monitoring the number of precedents updated to include relevant modern slavery clauses, and the number of tenders including modern slavery questions and responses.
- **Training:** Monitoring the number of individuals trained and feedback on the content.
- **Grievance mechanisms:** Monitoring and reporting (to the Ampol Board) Ampol's grievance mechanisms to identify trends and issues raised.
- **External engagement:** External engagement with forums, peers and experts in the field to understand best practice and emerging information relating to modern slavery.

As we mature our modern slavery response program, we will look to improve our measurements of effectiveness.

## External Engagement

During 2023, Ampol engaged with third parties to obtain feedback on its modern slavery reporting and sought opportunities for improvement. This included investor reports, research, and comparative literature. Further, Ampol engaged directly with experts in the fields of modern slavery regulation and reporting, and that feedback has been taken into account in this 2023 report.

Representatives from Ampol attended industry association events and roundtables on a range of modern slavery topics including wage underpayment and sex-based harassment.

During 2023, Ampol's procurement team sent representatives to attend various forums and conferences including law firm updates and procurement industry events which included modern slavery speakers and related content.

During 2024, Ampol will continue its external engagement including taking advantage of its industry associations to participate in modern slavery working groups and to attend future external sessions such as those hosted by the UN Global Compact.

### FUTURE ACTION

Ampol will continue to seek and identify additional opportunities to collaborate with others and participate in modern slavery forums.



## Assessing effectiveness and consultation continued

### Consultation with owned or controlled entities, including reporting entities

In implementing Ampol's modern slavery response program, Ampol has continued to consult with key stakeholders from relevant parts of the Ampol Group. This includes consultation with functions which operate across the Group and internationally (including legal, procurement and People & Culture) as well as targeted operational functions.

Ampol convenes a regular modern slavery working group which discusses annual reporting, targets, progress towards targets, systems, processes, program effectiveness and legal issues associated with modern slavery. The working group is a global team comprised of representatives from all parts of Ampol's business and forms a key operational consultative mechanism in the development of this report.

In addition, prior to approval by the Ampol Limited Board of Directors, this statement was reviewed by:

- Key members of the Ampol Leadership Team (ALT) responsible for the overall management of the Ampol Group and implementation of its strategy; and
- The Directors of Ampol Australia Petroleum Pty Ltd, Ampol Retail Pty Ltd and Ampol Petroleum Distributors Pty Ltd.

During the development of this statement, members of the modern slavery working group presented to the following entities (including individual executives, directors or senior leaders representing those entities). During those discussions, feedback was sought on the draft statement content including supply chain description, modern slavery risks, actions to assess and address those risks and future actions.

#### Entities Owned or Controlled:

- Z Energy Ltd
- Ampol QSR Pty Ltd
- Ampol International Holdings Pte Ltd
- Ampol Singapore Trading Pte Ltd
- Ampol Shipping & Logistics Pte Ltd
- Ampol Management Services Pte Ltd

#### Entities forming part of this Joint Statement:

- Ampol Australia Petroleum Pty Ltd (ACN 000032128)
- Ampol Retail Pty Ltd (ACN 000175342)
- Ampol Petroleum Distributors Pty Ltd (ACN 005632860)

This statement covers actions being taken by entities owned or controlled by Ampol. Investments in associates and joint ventures which are not controlled by Ampol are approached in a similar manner as suppliers.

The risks in relation to these entities are assessed and prioritised in the context of other Ampol Group modern slavery risk categories.



## Other relevant information and approval process



Collaboration increases the potential for meaningful change.

We recognise that modern slavery is not a thing of the past and this complex issue requires us to work collaboratively with our suppliers, customers, government and our communities.

Meaningful change and effective solutions require collaboration with governments, the private sector and society. Further, a focus on addressing the problems that contribute to modern slavery, such as poverty, lack of equal education opportunities and access to fair work opportunities can bring about meaningful change.

### Commitments and collaboration

The Ampol Foundation continues to be a vehicle through which we deliver our community investment strategy. By leveraging our financial strength, our network, and our people, we aim to bring value and build capacity in the communities in which we operate with the focus on improving the lives of Australians. Supported by the Ampol Leadership Team and led by a committee of employees, the foundation focuses activities on two key social areas of need – youth education and development, and community wellbeing and safety.

We are committed to operating our business in a manner that respects human rights by being a participant of the United Nations Global Compact and a signatory to the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption, which includes the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

Our total community investment contribution via the Ampol Foundation for 2023 was over \$4.6m, a 12% increase from 2022. Additionally, in 2023 Ampol celebrated 30 years of supporting the Westpac Rescue Helicopter Service. Further, Z Energy contributed NZ\$1million as part of the “Good in the Hood” program which supports local communities.

### Addressing the root causes of modern slavery

Reducing inequality and ensuring fair employment opportunities and quality education for all Australians will contribute to creating the underlying social infrastructure needed to eradicate modern slavery. Further information on the work of the Ampol Foundation is set out in Ampol’s 2023 Annual Report.

### Approval process

This statement was reviewed and approved by the Board of Directors of Ampol Limited on 9 May 2024. The Ampol Board of Directors will review and update this statement on an annual basis.

**Matthew Halliday**

Managing Director and CEO

