

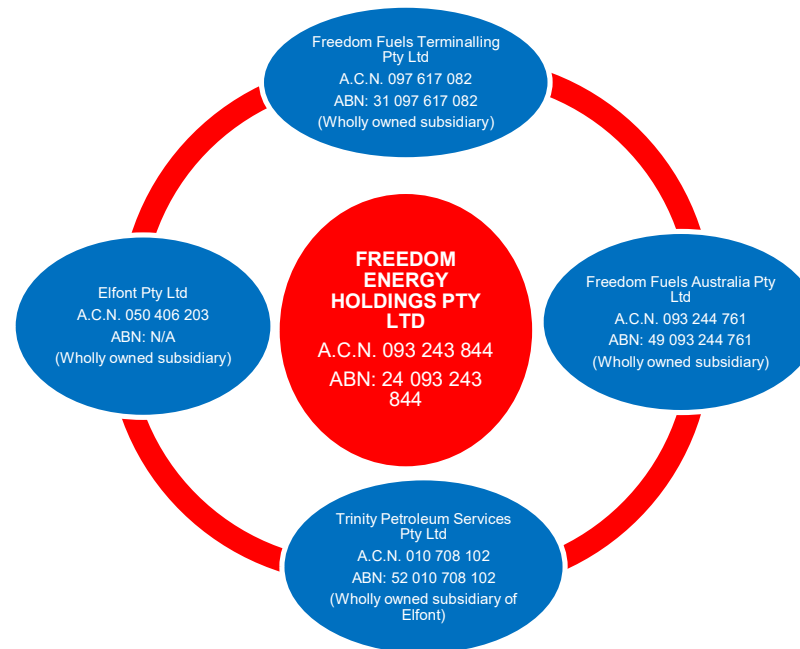
FREEDOM FUELS GROUP

MODERN SLAVERY STATEMENT 2021

This is the Freedom Fuels Group's second Modern Slavery Statement (**Statement**) published in compliance with our obligations pursuant to the *Modern Slavery Act 2018* (Cth).

About Freedom Fuels - Who we are

This statement covers the Freedom Fuels Group which incorporates Freedom Energy Holdings Pty Ltd ABN 24 093 243 844 (**Freedom**), the reporting entity, and its wholly controlled subsidiary entities as detailed in Chart 1 below.



Our Structure

The Freedom Fuels Group consists of two key operating entities, Freedom Fuels Australia Pty Ltd ABN 49 093 244 761 trading as **Freedom Fuels**, and Trinity Petroleum Services Pty Ltd ABN 52 010 708 102 trading as **Trinity Petroleum**: both of which are wholly owned by Freedom Energy Holdings Pty Ltd ABN 24 093 243 844.

Freedom Fuels is a Petroleum Importer, Bulk Supplier and Retailer in South East Queensland, and an Ex-Terminal Gate Bulk Fuel Supplier in all other major locations around Australia.

Our Retail Network is predominantly company owned and operated, and our bulk Fuels customers range from independently owned service station operators through to multi-national mining companies.

Freedom Fuels began as 11 retail sites and approximately 50 employees and has grown to become one of the leading independent fuel importers and wholesalers in South East Queensland with a growing branded retail network.

Freedom Fuels directly employs over 350 people within its organisation, the majority of whom work at the company owned and operated retail sites and are supported by a Brisbane based head office team.

The Freedom Fuels business units are supported by an import fuel terminal in Brisbane and through our partnership arrangements in other locations marketing fuel to customers from the Gippsland in Victoria to coal miners in the Bowen Basin, Queensland and all areas in between.

In December 2012, the Freedom Fuels Group business was wholly acquired by **Idemitsu Kosan Co., Ltd.**, a company listed on the Japanese stock exchange.

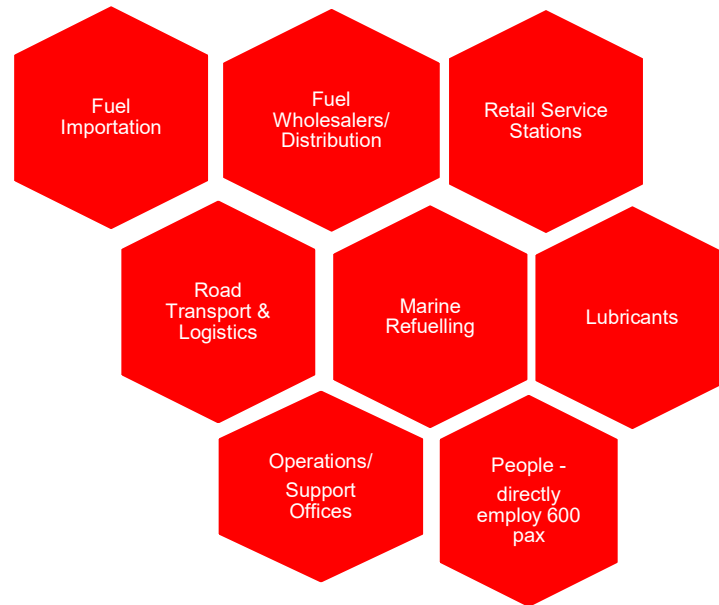
In 2018, the Freedom Fuels Group acquired **Trinity Petroleum** - Trinity Petroleum distributes Mobil fuels and lubricants to both the retail and wholesale markets throughout North Queensland. Trinity Petroleum provides high quality petroleum and lubricant products to a wide range of industries and sectors including mining, shipping, aviation, agriculture and transport all the way from the Torres Strait Islands in the north, Gladstone in the south and Mt Isa in the west.

Complementing our wholesale fuel and oil arm, Trinity Petroleum's retail division includes Mobil branded service stations located between Townsville and Cooktown. We are proud to provide locals with high-quality petroleum products for the past three decades.

Trinity Petroleum directly employs over 150 people, the majority of whom work at the company owned and operated retail sites and are supported by a Cairns based head office team, the Logistics/Drivers team, the Marlin Marina team, and Townsville sales team.

Supply Chain and Operations

We are foremost an independent petroleum business that undertakes the following activities:



Supply Partners – we work with more than 1500 direct suppliers across the Freedom Fuels Group, predominantly being Retail Merchandise and Fuel Suppliers.

What risks of modern slavery practices exist in our operations and supply chains

- Low risk: Supply of petroleum products is considered low risk given the nature of sale of imported products ex refinery and domestically;
- Potential areas of higher risk: Supply of consumables, cleaning products and retail service station shop products for resale.

- Procurement is centralised via our Head Office for all suppliers.

How we assess and address modern slavery risks including our due diligence and remediation processes

- Introduction of Modern Slavery Self-Assessment Questionnaire issued which assesses modern slavery risk indicators such as:
 - Worker Information and Employment Conditions;
 - Modern Slavery Policies and Procedures;
 - Supply Chain Management;
 - Child Labour;
 - Forced Labour, Bonded Labour, Human Trafficking;
- Audit of key suppliers via this Questionnaire;
- Contractual terms addressing modern slavery risks;
- Staff education and training.

Risk management Structure

- Freedom Energy Holdings Board = ultimate responsibility for corporate governance, overseeing the risk of modern slavery and ratifying this Statement.
- Executive Team = comprising the Managing Director, CEO, CFO, Inhouse Solicitor, GM Retail and GM – Planning and Inter-group Communications: responsible for overseeing enterprise-wide risk management and via the delegation to the Compliance and Risk Committees, and Senior Managers.
- Freedom Fuels has an integrated approach to risk management.

How we assess the effectiveness of our actions

Freedom Fuels is committed to addressing its modern slavery risks and encourages reporting of any potential risks.

Suppliers will continue to be audited via our Modern Slavery Self-Assessment Questionnaire and this will be subject to annual audit. In the event of non-compliance, Freedom Fuels will either cease to engage the Supplier or make any necessary reporting to require the Supplier addresses and remediates any incidences of modern slavery where applicable.

We will undertake continuous and ongoing assessment of our Modern Slavery processes to determine their effectiveness in enabling us to monitor our supply chains, by evaluating information that we receive from our suppliers, and to ensure our processes mean we can promptly act on allegations or findings of any involvement in modern slavery practices.

We will also conduct an annual review process whereby our Senior Management Team will review our policies and procedures and our plan to prevent, and respond to, modern slavery. Risk assessments of our operations and supply chain are conducted quarterly by our Risk Committee to continually be monitoring our regulatory and business compliance.

Freedom Fuels has grievance mechanisms accessible via our internal grievance systems and our external whistle-blower hotline to facilitate reporting of any potential modern slavery incidences.

Consultation within our business

Consultation was undertaken by Freedom, as the reporting entity, with all controlled entities in which it held a “controlling interest” during 2021. This consultation was focused on the education of all entities about the Modern Slavery Act and the process being undertaken by the Freedom Fuels Group within its business to mitigate modern slavery risks. We communicated our expectations and offered our assistance where required via further guidance.

All subsidiaries are managed by Freedom’s Head Office and are required to adopt same policies and procedures.

All Executive Team members and Senior Managers receive training about the Modern Slavery Act and its practical application to the business.

All entities were provided with documentation outlining the Freedom Fuels Group’s expectations, directed towards the appropriate governmental resources, and offered the opportunity to contact our internal Legal Team for further information.

Future commitments:

During 2022, our goal is to:-

- deliver ongoing annual Modern Slavery awareness training for key employees involved in operations and supply/procurement;
- continue incorporating contractual obligations which address risk;
- engage in procurement practices which encourage supply from those committed to managing the risk of modern slavery in their own operations and supply chains; and
- continue incorporating contractual terms that require compliance with Australian Modern Slavery laws.

This Statement was approved at the Freedom Fuels’ Board of Directors meeting on 26th October 2021 and signed by the Chief Executive Officer of Freedom Energy Holdings Pty Ltd.



Robert McCagh

CEO

FREEDOM ENERGY HOLDINGS PTY LTD

DATE: 26/10/2021