



Modern Slavery Statement 2025

This statement has been produced on behalf of APCO for the purposes of reporting under the *Modern Slavery Act 2018* (Cth) (the **Act**) for the financial year 1 July 2024 to 30 June 2025 (the **Reporting Period**). This statement is made as a joint statement under section 14 of the Act, covering the reporting entities:

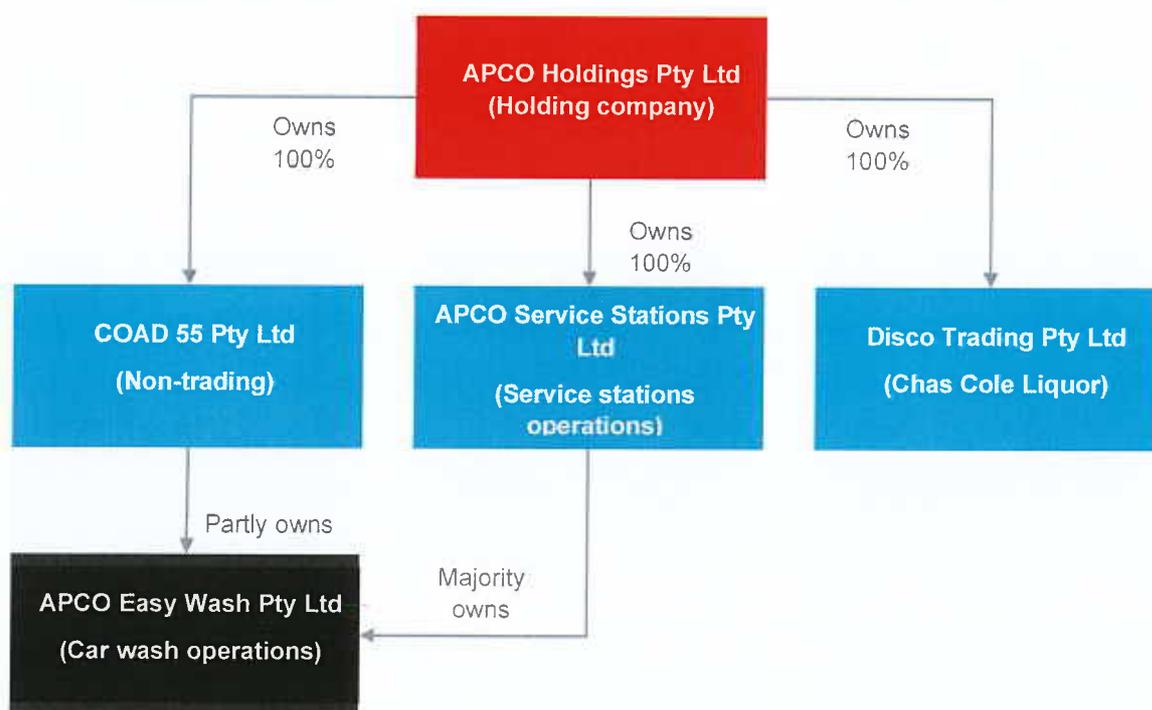
- (1) APCO Holdings Pty Ltd (ABN 42 108 388 932) (**APCO Holdings**); and
- (2) APCO Service Stations Pty Ltd (ABN 91 007 229 898) (**APCO Service Stations**).

The reporting entities, and their owned or controlled entities, are referred to collectively as APCO, we, us, our in this statement, except where otherwise stated.

Mandatory reporting criteria	Page No
Identification of the reporting entity	1
Description of the structure, operations and supply chain of APCO	2-3
Description of the modern slavery risks in the operations and supply chain of APCO and any entities it owns or controls	3-4
Description of the actions taken by APCO and any entities it owns or controls to assess and address those modern slavery risks	3-5
Description of how APCO assesses the effectiveness of these actions	5
Description of the consultation process on the development of the statement with the reporting entities and entities APCO owns or controls	5

Our structure

APCO is a family-owned business operating through a group of related companies. APCO Holdings serves as a holding company. APCO Service Stations is wholly owned by APCO Holdings and operates the retail fuel and convenience store business.



Our operations

APCO owns or operates 28 retail fuel and convenience stores, 11 car wash facilities and two liquor stores. APCO employs approximately 307 people, primarily in regional Victoria and New South Wales. The business primarily specialises in supplying quality fuels, fresh café-style food, barista-made coffee, and convenience grocery items.

APCO's retail operations include:

- Fuel supply and retail through service stations, with fuel sourced directly from VIVA Energy and Mobil Oil Companies
- Convenience stores offering modern retail experiences with larger-than-average floor areas
- Café 24-7 branded foodservice operations providing barista-style coffee and fresh food
- Anderson's Supermarket brand operations in selected locations for grocery top-up shopping
- Car wash services through APCO Easy Wash Pty Ltd, operating 11 car wash facilities throughout regional Victoria
- Retail packaged liquor sales through two Chas Cole Cellars stores operated by Disco Trading Pty Ltd

APCO owns and operates four of the 28 retail fuel and convenience stores in Victoria. APCO otherwise operates under an owner-operator licensee format, which creates a strong community presence and drives customer loyalty. APCO Service Stations owns and maintains the fuel supply logistics, forecourt facilities, and major store equipment including air conditioning, shelving, registers, and kitchen equipment. Retail licensees operate the stores and are paid fuel commissions based on

volume sold, while APCO Service Stations covers most fixed costs including electricity, gas, rates, and store fit-outs.

APCO Holdings owns and leases properties to the operating companies, receiving rental income. It otherwise operates as a holding company without standalone operations.

Our supply chain

APCO's supply chain is primarily made up of the following procurement categories:

- **Retail goods** sold in our owned and operated stores, comprising suppliers across multiple product categories, including beverages, tobacco, confectionary, snacking, grocery, meat and poultry
- **Apparel**, comprising uniforms, PPE & workwear for store personnel
- **Fuel products** including petrol, diesel, liquified petroleum gas (LPG), fuel pumps and associated forecourt infrastructure.
- **Construction services** including civil engineering, demolition, building services.
- **Technology and electronics**, including computer and EFTPOS systems, lighting, and IT support.
- **Professional services**, including lawyers, accountants, advertising and consulting agencies.
- **Facilities management**, including cleaning and security, trade and maintenance services and utilities.

The overwhelming majority of our direct suppliers are registered in Australia, with a handful of suppliers from New Zealand, and the United Kingdom. These suppliers are concentrated in Victoria and New South Wales, with some presence in Queensland, South Australia and Tasmania. Whilst our direct supplier relationships are predominantly domestic, APCO recognises that many of these suppliers likely source raw materials, ingredients, and packaging from international markets, creating extended supply chains that may include higher-risk jurisdictions.

Risk of modern slavery in our operations and supply chain

Operations

Based on the following factors, we have assessed the modern slavery risks in our operations to be low:

- Our entire workforce is based in Australia, which is a low-risk jurisdiction for modern slavery according to the Global Slavery Index.
- The majority of our employees are engaged in full-time (33%) or part-time (36%) roles, with 31% of our workforce employed casually.
- 10% of our workforce are under the age of 18. We have systems to support our junior staff, including a buddy system.
- The majority of our workforce is employed in the fuel retailing or retail trade sector, which is not identified as a high-risk sector in Australia by the Global Slavery Index.
- Employees are provided with written contracts of employment.
- We do not use third party labour providers.
- We have measures to ensure APCO and our licensee stores comply with Australian workplace and employment laws. We describe these actions in more detail below.

Supply chain

Whilst our direct supplier relationships are predominantly located in Australia, we acknowledge that we have limited visibility over further tiers of the supply chain, including where and how our direct suppliers are manufacturing their goods, sourcing raw materials and ingredients, and engaging subcontractors or labour providers in their own operations.

Despite these limitations, we have identified inherent modern slavery risks in the following procurement categories:

- **Apparel** products are commonly sourced from or manufactured in regions with documented risks of forced and child labour. Textile supply chains across the Asia-Pacific region present risks including forced overtime, debt bondage, and state-imposed forced labour. Garment workers are also exposed to exploitative working conditions, including excessive hours and unsafe work environments.
- **Fuel products** have complex and opaque global supply chains, with risks of modern slavery in the extraction and processing of petroleum in countries with poor governance and weak labour standards, the manufacturing of equipment and the transportation of products.
- The global nature of **tobacco, food** and **beverage** manufacturing means that upstream supply tiers likely include sourcing from regions where modern slavery risks are more prevalent. The confectionery and snacking sectors, in particular, often rely on global agricultural supply chains where risks of forced labour and exploitative practices have been documented in cocoa, sugar, and palm oil production. Café consumables and packaging may also pose increased risk exposure as textiles, papers and plastics have been linked with modern slavery in several regions.
- The **construction, agriculture** and **facilities management** industries in Australia present elevated risks of modern slavery. These industries are often characterised by low-wage work, short-term/seasonal demand, subcontracting and indirect labour arrangements, and reliance on migrant workers, which increase the risk of modern slavery.
- **Technology and electronics** are exposed to upstream modern slavery risks. The extraction of rare earths and precious metals has documented exposure to forced and child labour in several regions. For example, polysilicon supply chains have been traced to state-imposed forced labour of the Uyghur population in the Xinjiang region.

How we assess and address risk in our operations and supply chain

APCO has measures to assess and address modern slavery in our operations and supply chain.

Supplier risk assessment

As noted above, we conducted an inherent modern slavery risk assessment of our supply chain and identified elevated risks in certain procurement categories. This involved a desktop assessment of risk factors like supplier location, industry and product or service by reference to public resources such as the Global Slavery Index, Responsible Sourcing Tool, US Department of Labor's List of Goods Produced by Child Labor or Forced Labor and Verite Commodity Atlas. In the coming reporting periods, we will assess and confirm priority procurement categories for engagement to improve our understanding of the risks of modern slavery and the actions of our first-tier suppliers to identify and address modern slavery risks deeper in our supply chain.

Operational policies and training

APCO maintains a full suite of policies relating to the employee life cycle and workplace expectations on the APCO Journey portal, including policies on bullying and harassment, leave, and workplace health and safety. All new starters must read and acknowledge these policies, and refresher training is provided every 3-6 months, with policies accessible at any time through APCO Central.

APCO has implemented a Code of Conduct and Workplace Expectations Policy, supported by an Employee Handbook that sets out our expectations for ethical business conduct. We have also established a Mental Health and Wellbeing Policy reflecting psychosocial laws, and promote employee wellbeing initiatives such as R U OK Day and an Employee Assistance Programme through Nexus Psychology, which is promoted across our network of stores.

Employment compliance systems

APCO uses software for rostering and attendance, which is linked to XERO to ensure payroll compliance under relevant awards, including penalties and public holidays. All employment contracts reflect the applicable award and any increases, ensuring employees receive their lawful entitlements and are paid above the minimum wage. APCO requests evidence at interview for rights to work, regional visas and supporting documentation.

Licensee oversight

APCO's retailer agreements with licensee's set out APCO's expectations that licensees will comply with all applicable laws, including employment law, and act lawfully and ethically. APCO conducts training for licensees and Regional Business Managers regular conduct site visits and audits. APCO is commencing network-wide payroll and compliance audits via a third party in the first half of 2026 to ensure service station licensees implement and comply with employee entitlements and APCO's ethical and compliance standards.

Grievance mechanisms

APCO encourages employees and other workers, including those working at licensee-operated sites to raise any concerns with direct line managers. Our policies and procedure also include contact details for people to raise confidential concerns internally.

How we assess the effectiveness of our actions

APCO prioritised understanding modern slavery risks in our operations and supply chains during this reporting period. As we are in the early stages of this process, meaningful assessment of our current measures' effectiveness is not yet appropriate.

Our commitment to addressing modern slavery risks involves ongoing review and enhancement of our approach across operations and supply chains. Our priority for the next reporting period is to seek to engage with suppliers within identified priority procurement categories, including our major fuel suppliers. We will also review our standard supplier terms to identify opportunities for risk identification and mitigation.

We will use these goals to measure our progress and determine future direction.

Consultation process

In order to prepare this joint statement, we engaged with representatives of APCO Holdings and APCO Services Stations and the entities we own or control. This included consulting representatives from Finance, Human Resources, and Category and Marketing responsible for entities across the APCO Group on actions taken to assess and address modern slavery to inform this statement and to develop goals for the next reporting periods.

Approval and signature

This statement was approved by the directors of APCO Holdings Pty Ltd as the principal governing body of APCO Holdings Pty Ltd on 22nd December 2025.

APCO Holdings Pty Ltd is the higher entity for the purposes of approval of this joint statement with APCO Service Stations Pty Ltd.

This statement is signed by a responsible member of APCO Holdings Pty Ltd and APCO Service Stations Pty Ltd as defined by the Act:

A handwritten signature in dark ink, appearing to read 'Robert Anderson', with a stylized flourish at the end.

Robert Anderson

Director of APCO Holdings Pty Ltd and APCO Service Stations Pty Ltd

22 December 2025