

MODERN SLAVERY STATEMENT

For the Financial Year Ending 31 December 2020

I. Introduction

This statement is made pursuant to section 16 of the Modern Slavery Act 2018 and constitutes the anti-slavery and anti-human trafficking statement for the financial year ending 31 December 2020 for Puma Energy (Australia) Bitumen Pty Ltd. (ACN 147 981 020), Puma Energy (Australia) Kwinana Pty Ltd (ACN 167 227 885). and Puma Energy (Australia) Assets Holdings Pty Ltd (ACN 167 119 020), (together, the **Reporting Entities**).

II. The structure and operations of the reporting entities

Puma Energy is an integrated global energy company. We have a truly global reach with operations in 41 countries across the world, including around 1,900+ service stations, 31 major terminals in our infrastructure business with a combined storage capacity of around 6.7 million m³ and a global workforce of around 7,100 including contractors.

Puma Energy (Australia) Bitumen Pty Ltd (**PEAB**) and Puma Energy (Australia) Kwinana Pty Ltd (**PEAK**) are wholly owned subsidiaries of Puma Energy (Australia) Assets Holdings Pty Ltd (**PEAAH**). The ultimate parent of PEAAH is Puma Energy Holdings Pte Ltd, a company incorporated in Singapore.

The Reporting entities are companies limited by shares, incorporated and domiciled in Australia. The principal place of business is Level 3, 51 Alfred Street, Fortitude Valley, QLD, 4006 and the registered office address is Level 12, Grosvenor Place, 225 George Street, Sydney, NSW, 2000.

PEAB specialises in importation, modification and supply of bituminous binders for the Australian road maintenance and construction industry. The range of products include Paving Grade Bitumen, Polymer Modified Binders, Cutback Bitumens and Precoat. It has operations in Townsville, Perth, Brisbane, Melbourne, Sydney and Hobart.

PEAK is constructing a 240,000 m³ storage terminal in Perth that is expected to be completed by 2022.

PEAAH has a non-operating working interest in Bitumen Storage Services Pty Ltd (**BSS**). BSS owns and operates a bitumen terminal in Perth.

The reporting entities together employ 67 employees.

III. Supply chain and risk of modern slavery

PEAB procures bitumen primarily (approximately 81%) from Puma Energy Supply and Trading Pte. Ltd. (PES), the group company based in Singapore responsible for sourcing and importation of product into the storage terminals located at Brisbane, Townsville, Sydney and Hobart. BSS sources and imports bitumen into storage terminals at Perth. The remaining product is sourced prima-facie source from Australian suppliers. PEAB uses the imported bitumen at all locations to process and/ or modify it with additives and polymers before selling the final product to customers in Australia.

Approximately, 80% of bitumen procurement was from the countries that have medium to low risk of forced labour including United States, Italy, China, Singapore, Turkey and Malaysia. During the year, PES imported 45% of Bitumen from the group company, Puma Energy (Malaysia) Sdn Bhd. Raw materials other than bitumen, polymer modifiers, crumb rubber and aromatic oils are sourced from within Australia, with an exception of polymers that are imported from Germany. Our non-oil procurement is through suppliers with 97% based in Australia. The raw materials are stored in warehouses that are operated by Australian third party logistics companies.

The imported bitumen is stored in the terminals owned by PEAB in Townsville, Brisbane and Hobart. In Sydney, the bitumen is stored in the terminal leased from an Australian company, who own and operate the terminal. In Melbourne, the company owned facility receives Bitumen from the local customers for toll blend modification. In Perth, imported bitumen from BSS is used to manufacture bitumen products at the company owned terminal.

The Bitumen Technical Centre in Melbourne, Australia focuses on research and development from the assessment and selection of bitumen sources through to the performance of asphalt and sprayed seals.

During the financial year for PEAK, the major activity at the terminal site included construction of the storage tank and completion of the civil works. In the last year, 37 suppliers were engaged for contract value greater than USD 100,000 for the construction and civil works at the site in Perth. Out of these, 60% were based in Australia.

Although the risk in our supply chain is assessed as being low risk for modern slavery, we are committed to working with our supply chain to ensure that together we can work to eliminate any form of forced, bonded or child labour.

We want to work with suppliers who share our values and support us in delivering our purpose of energising communities. Each of our suppliers has its own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights.

Puma Energy expects all suppliers and contractors to obey the national laws and international standards that require them to treat workers fairly, to provide a safe and healthy work environment and to protect environmental quality. Any allegations of wrong doing raised are investigated and may result in suppliers being required to develop corrective action plans backed up by onsite audits. In addition, contracts may be terminated with immediate effect if suppliers' breach, or we suspect they are in breach, of the Puma Energy Supplier Code of Conduct.

Our focus, for the purpose of this declaration, is on our direct suppliers; however, we expect suppliers to share our expectations, as embodied in the Puma Energy Supplier Code of Conduct, throughout their own supply chains.

IV. Actions to assess and address the risks

Our Commitment

Puma Energy is committed to playing our role by ensuring that through our management and operations we have the systems, policies and processes in place to identify any potential instances of exploitation and, if found, eradicate modern slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for Puma Energy benefits from a working environment in which their fundamental human rights and dignity are respected and anyone that we do business with also upholds these principles.

Our Purpose and Values

At Puma Energy, our purpose is to work with local people to energise communities and transform lives. We take pride in our role: listening, learning and sharing to raise standards, earn trust and help economies run better, solving problems and offering solutions that our customers need. Our purpose is supported by our values:

<p>We are customer focused</p>	<p>We lead by example</p>	<p>We collaborate</p>	<p>We are agile</p>
<ul style="list-style-type: none"> • We put our customers first 	<ul style="list-style-type: none"> • Setting high standards, openness and trust, learning from feedback 	<ul style="list-style-type: none"> • Using teamwork, mutual respect and accountability to build partnerships with our stakeholders and communities 	<ul style="list-style-type: none"> • Embracing change and listening to ideas.

Our values are demonstrated by our conduct every day and respect for human rights is embedded in our Code of Business Conduct. Our Code states: ‘We Respect Others - Puma Energy and its employees respect the dignity, liberty and equality of everyone we work with – customers, vendors, suppliers and third parties alike. Our policies and procedures are based directly on the United Nations’ Universal Declaration of Human Rights’. In pursuance of this, Puma Energy in Australia is committed to preventing slavery and human trafficking in its own activities and in its supply chain by requiring suppliers to maintain ethical business practices and in particular to prevent slavery and human trafficking in their businesses.

Governance and Policies

Governance

The Group’s Ethics and Compliance Committee (ECC) is responsible for the general oversight of the implementation of the Code of Business Conduct. The ECC provides guidance to the business regarding compliance with the Code and investigates and addresses any complaints of breaches of the Code including with respect to human rights. The owner of the ECC is Global Head of Compliance, who reports directly to the CEO and the Chairman of the Board.

Policies and Procedures

The following policies support us in mitigating the risks of modern slavery in our business and supply chain and are important steps in gaining supplier compliance. These policies are available to all employees on the company intranet.

Code of Business Conduct:

At the corporate level, Puma Energy’s Code of Business Conduct applies to all employees of the group. The Code describes what we must do and how we must behave and requires our employees to treat all individuals with dignity and respect, eliminating unfair and/or unsafe labour practices.

Supplier Code of Conduct:

Puma Energy Supplier Code of Conduct addresses our commitment to seek out business partners who share our values and specifically prohibits our suppliers from using forced, bonded, involuntary, prison, or indentured labor.

We take violations of our Codes very seriously. For example, violations of the Supplier Code may result in termination of the supplier relationship, while violations of the Code of Business Conduct and Ethics may result in termination of employment.

Speak-Up Policy:

The policy sets out our commitments to creating an environment, where all employees and third parties can speak up about suspected breaches and violations of our Code and accompanying policies. It details how any person working at or with Puma Energy, including those employed in our supply chain, can raise concerns or ‘whistle blow’ and the channels available to do so confidentially, responsibly and effectively and without fear of repercussions or retaliation.

The policy is supported by our dedicated helpline, in place for all employees and contract staff in Puma Energy and for third parties with whom Puma Energy has a business relationship (such as customers, suppliers, service providers). It allows them to raise concerns and report instances of potential non-compliance with our Code of Business Conduct, including respect for human rights, in full confidence and without fear of retaliation.

Diversity and Inclusion Policy:

Ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated.

Due Diligence

Puma Energy’s Supplier Due Diligence process requires that our suppliers comply with Puma Energy’s Code of Business Conduct, make sure that they adhere to the requirements, require their own suppliers to respect equivalent standards, and pay particular attention to Human Rights standards including employees’ working conditions. Suppliers’ compliance with the Supplier Code of Conduct is managed through our rigorous supplier onboarding due diligence process for all new suppliers. The questionnaire covers among many other aspects, questions on employee liberty, freedom of association and minimum age requirement.

While we are not currently verifying or auditing that all our suppliers comply with local laws regarding slavery and human trafficking, we will continue to assess our supply chain for areas of improvement in eradicating slavery and human trafficking, and will continue to expect our suppliers to do the same.

Training and Communication

The Code of Business Conduct and its refresher training ensures that employees are familiar with the requirements of the Code of Business Conduct and the company policies. Further, in 2020 we conducted speak up training for all our employees, providing them with information on how and when to speak up.

Additionally, every new employee of Puma Energy in Australia must complete an online training course, which includes a module on Speak Up.

V. Assessing the effectiveness of actions

Risk Assessment

In 2020, we conducted a modern slavery risk assessment of the Puma Energy group of companies including Australia. Our findings indicate that we do not supply any goods, globally or in Australia, that have been identified by the US Department of Labor

<https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods> or the Global Slavery Index <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>, to be at higher risk of being produced by child or forced labor, reducing our risk.

Our Code of Business Conduct and other accompanying policies, and actions taken by the Company, such as employment clauses and background checks, further mitigate the risk.

The assessment indicated that as a company we will need to take steps to implement dedicated trainings for at risk functions on Modern Slavery, which we will implement in the current financial year.

Looking Forward

At Puma Energy we remain committed to ensuring that we do business only in the right way, respecting all that work at or with us. We will continue to embed the principles through:

- Developing a dedicated Modern Slavery policy
- Providing further awareness training to employees whose functions are deemed at risk such as Procurement, Human Resources and Retail stations on ethical employment practices.
- Continue to monitor and take action to ensure zero tolerance in the supply chain.

VI. Approval

This statement has been approved by the Board of Directors of Puma Energy (Australia) Bitumen Pty Ltd., Puma Energy (Australia) Kwinana Pty Ltd. and Puma Energy (Australia) Assets Holdings Pty Ltd. The Boards has authorised a Director, **Jonathan Pegler** to sign the statement.

Signed on behalf of:

Puma Energy (Australia) Bitumen Pty Ltd.



Director: Jonathan Pegler
Date: 29 December 2021

Puma Energy (Australia) Kwinana Pty Ltd.



Director: Jonathan Pegler
Date: 29 December 2021

Puma Energy (Australia) Assets Holdings Pty Ltd.



Director: Jonathan Pegler
Date: 29 December 2021